

# **Advance Notice of Proposed Rulemaking**

## **Summary of Public Comment**



**May 31, 2002**



**Content Analysis Team**  
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# Executive Summary

## Introduction

The following is a summary of public comment received by the Forest Service regarding the Advance Notice of Proposed Rulemaking for roadless conservation. The comment period was July 10, 2001, to September 11, 2001. The Forest Service received approximately 726,440 responses—including letters, emails, and faxes—approximately 52,432 of which are original responses. The balance of the responses are form letters, which the Content Analysis Team defines as five or more letters consisting of identical text submitted by different people. One example of each form type is coded and entered into the data base to ensure that the concerns are considered. The balance of the forms are sorted by form type, tallied by state, and the total number of each recorded in the database. The analysis provided in this document is based on the approximately 52,432 original responses and the one example of each form letter.

These responses have been analyzed using a process called content 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. The analysis attempts to provide fair representation of the wide range of views submitted, but makes no attempt to treat input as if it were a vote. The goal of the content analysis process is to ensure that every comment is considered.

## Content Analysis Process

The content analysis used on this project is a method developed and refined, over the years, by a specialized Forest Service unit, the Content Analysis Team (CAT). This method employs both quantitative and qualitative approaches. It is a systematic process designed to provide a mailing list of respondents, categorize the comments contained in each response,<sup>1</sup> and identify and summarize similar comments from different responses. The process produces a relational database in which categorized comments are linked to original letters and from which various types of information can be reported.

Through the content analysis process CAT strives to identify the concerns raised by all respondents. Breadth and depth of comment are important. CAT's intention is to represent the public's viewpoints and concerns as fairly as possible, and to present those concerns in such a way as to assist the Forest Service to effectively respond to them.

## Project Background and Document Overview

The Advance Notice of Proposed Rulemaking (ANPR) proposes an evaluation of roadless area values and public concerns in anticipation of a new rulemaking which will specifically address roadless area management in National Forest System lands.<sup>2</sup> Management of inventoried roadless areas was previously addressed in the Roadless Area Conservation Rule (Rule), signed

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<sup>1</sup> A response is a single, whole submission—e.g., a letter, e-mail, fax, presentation at a public meeting, etc. A comment is a specific, identifiable expression of concern within a response.

<sup>2</sup> National grassland roadless areas are also included in this statement, but for convenience this document refers to national forests unless a respondent's comment makes specific reference to national grasslands.

by the Secretary of Agriculture, Dan Glickman, on January 5, 2001. On May 10, 2001, the U.S. District Court for the District of Idaho enjoined the Forest Service from implementing the Rule, a decision that is under appeal. The ANPR identifies 10 questions to assist in the identification of values and concerns regarding the protection of roadless areas:

1. ***Informed Decisionmaking.*** What is the appropriate role of local forest planning as required by NFMA in evaluating protection and management of inventoried roadless areas?
2. ***Working Together.*** What is the best way for the Forest Service to work with the variety of states, tribes, local communities, other organizations, and individuals in a collaborative manner to ensure that concerns about roadless values are heard and addressed through a fair and open process?
3. ***Protecting Forests.*** How should inventoried roadless areas be managed to provide for healthy forests, including protection from severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreaks?
4. ***Protecting Communities, Homes, and Property.*** How should communities and private property near inventoried roadless areas be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal lands?
5. ***Protecting Access to Property.*** What is the best way to implement the laws that ensure states, tribes, organizations, and private citizens have reasonable access to property they own within inventoried roadless areas?
6. ***Describing Values.*** What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates inventoried roadless areas?
7. ***Describing Activities.*** Are there specific activities that should be expressly prohibited or expressly allowed for inventoried roadless areas through forest plan revisions or amendments?
8. ***Designating Areas.*** Should inventoried roadless areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation, or should they be maintained under a specific designation for roadless area management under the forest plan?
9. ***Competing Values and Limited Resources.*** How can the Forest Service work effectively with individuals and groups with strongly competing views, values, and beliefs in evaluating and managing public lands and resources, recognizing that the Agency cannot meet all of the desires of all of the parties?
10. ***Other Concerns.*** What other concerns, comments, or interests relating to the protection and management of inventoried roadless areas are important?

In the list of public concerns accompanying this executive summary, the topics addressed by these 10 questions are organized into logical groupings within six chapters. **Chapter 1, Introduction to National Roadless Protection Rulemaking**, covers general reasons for and against developing a national roadless rule in general and the Rule in particular, and the adequacy of the above 10 questions. **Chapter 2, Process, Planning, Policies, and Laws**, covers

concerns related to the National Forest Management Act, National Environmental Policy Act, interim direction, other policy concerns, appeals and litigation, and various other legal concerns. **Chapter 3, Public Involvement**, covers concerns related to Questions 1, 2, and 9. **Chapter 4, Roadless Area Values**, covers concerns related to Question 6. **Chapter 5, Forest Management**, covers concerns related to general forest management; concerns related to Questions 7 and 8; and concerns related to agency organization and funding. **Chapter 6, Protecting Forests, Communities, and Private Property Access**, covers concerns related to Questions 3, 4, and 5. These question numbers appear in parentheses next to the chapter or main section title covering that topic.

There is no chapter or section of the document devoted to Question 10, Other Concerns. Comments that specifically reference Question 10 range from simple requests to implement the Rule as it now stands to reiterations of concerns addressed in other questions. Thus it is impossible to categorize most responses to Question 10 into groupings which differ from responses to the other nine questions. The topics people address which do not logically fall under Questions 1 through 9 are accounted for in Chapters 1 and 2, as well as in the sections on general forest management and agency organization and funding in Chapter 5.

One further point needs to be made regarding the organization of the chapters around the questions posed in the ANPR. While some respondents do specifically reference the 10 questions in their remarks, many others do not. All responses are considered in the content analysis process, and every effort is made to identify all concerns and present them in a logical, readable format. Because the ANPR poses specific questions, this document is organized topically around those questions. But because the organization is topical, all concerns which address a given subject are included within the same section, whether the respondent raising that concern specifically references the question associated with that topic or not. In this way the document attempts to present the public concerns as a response to the questions posed in the ANPR, while at the same time presenting all related concerns raised by the public.

The issues relating to roadless area management, and likewise the concerns expressed by the public, are highly interrelated. The chapters into which the concerns are organized, therefore, must be seen as broad, overlapping areas. Every effort has been made to organize respondents' comments into natural, clear, and accessible categories. However, due to the common, overlapping themes which run through these issues, similar concerns often appear in multiple places.

Following the six chapters described above are six appendices. Appendix A describes the content analysis process; Appendix B is the coding structure used for this analysis; Appendix C is an index of public concerns; Appendix D is a demographics report; Appendix E is an organized response campaign report; Appendix F lists specific places respondents request be included in/excluded from roadless area protection or to be recommended/not recommended to Congress for wilderness designation; and Appendix G provides a list of preparers of this document.

Finally, regarding terminology, many respondents refer explicitly to the Roadless Area Conservation Rule signed January 5, 2001. Others are not so explicit, and in some contexts it is not clear whether the respondent is referring specifically to that Rule or to a national roadless rule in general. When it is clear that a comment refers to the actual Roadless Area Conservation Rule signed January 5, 2001, then reference in the analysis is made specifically to the Roadless

Area Conservation Rule, or the Rule. When it is not clear whether the respondent's reference is specific or generic, then reference in the analysis is made to a national roadless rule.

## General Overview of Public Comment

Respondents differ in their views of whether there is a need for the ANPR and a new round of national roadless rulemaking. In general, those who doubt the need argue that the Rule was adequate in process as well as content, and they ask that the Rule be implemented. Those who believe there is a need for a new rulemaking say the process for the Rule was rushed, that a new round of comment is justified, and that the Rule should not be implemented. These two viewpoints are integrally tied to comments regarding forest management in general.

Some respondents emphasize protection and preservation; they ask that restrictions on active management be imposed at the national level and that natural systems be allowed to operate without human intervention. Others emphasize active management of resources; they ask that resource decisions be made at the local level, arguing that land managers and local citizens not only have a greater stake in decisions close to their community, but also have a historical perspective on past decisions which they believe shows that active management is better for the environment.

Some respondents assert that the values they most associate with forest lands are clean water and air, biodiversity among plant and animal life, unfragmented wildlife habitat, and opportunities for solitude and mental rejuvenation. Thus, they tend to stress the intrinsic value of untouched areas, and believe there is a need to allow natural processes—including, under certain circumstances, wildfire and insect/disease outbreaks—to operate without human interference. They state that human interference upsets nature's balance and that the Forest Service must have a national policy to protect these areas not only for the health of the environment but for future generations of people to experience.

These respondents submit that there is too much active management; that these activities are subsidized; that long-term economic costs are ignored; and that human intervention has and continues to have effects on the environment which mitigation cannot undo. These respondents also believe that these perceived effects on the environment primarily benefit local communities and natural resource industries, and they do not think the nation as a whole wants or benefits from active management of the National Forest System. They ask the Forest Service to establish a programmatic policy that restricts management of undeveloped areas.

Some respondents also assert that natural resource industries are in decline. They question claims that public land management policies and laws are responsible for job losses and economic hardship in rural areas. They believe it is the cyclical and competitive nature of these industries themselves and the societal preferences and priorities they see shifting towards other uses of the national forests. According to these respondents, the nation as a whole is coming to value forest lands more for the ecological health and recreational opportunities they provide than for the timber and minerals that can be taken from them. They maintain that people in declining industries have in the past had to adjust to new economic realities, so now people dependent on natural resource industries must adjust. Some suggest that government-sponsored retraining programs should be developed, but in general they say that rural communities must make an effort themselves to adapt.

In short, many of these respondents say undeveloped lands foster happy and healthy lifestyles and best provide the environment with clean air and water, genetic diversity of plant and animal life, and opportunities for recreational solitude and renewal.

Many of these individuals also question the reasoning behind this new round of review and comment. They say the Rule was the result of a three-year public review process that included over 600 public meetings and 1.6 million responses, most of which reflected satisfaction and expectation that the Rule would be implemented. They believe the Forest Service should have more vigorously defended the Rule in litigation and not started a new rulemaking process. They ask why the ANPR was released for comment and suspect this Administration is taking the interests of local communities and natural resource industries over what they see as national interests and environmental benefits. Respondents report feeling disenfranchised and wonder whether their comments will have any influence. These parties urge the Forest Service to implement the Rule in the form in which it was signed in January 2001.

Other respondents offer a different perspective. They believe National Forest Systems lands can be safely developed and products taken without long term effects, and they assert that active management is necessary for forest health. These respondents believe that forest thinning is essential to prevent fuel buildup and catastrophic wildfire, that access is necessary to carry out such thinning projects, to fight fires that do occur, and to carry out other management activities, such as eradicating invasive species and treating for insects and disease. All these activities, say these respondents, constitute good management of our natural resources—benefiting the natural environment, the plant and animal species that reside in these forest lands, and the people who use and enjoy the products such management affords.

These respondents often mention that they care about the environment and that they understand where needed natural resources come from and how to manage them while caring for the land. They suggest that those who do not rely on the land for a living are so far removed from the direct sources of energy and consumer goods that they do not understand the connection back to the land. They believe those who work in active natural resource management and see the connection are better qualified to offer comment on public land management than those for whom a visit to a national forest is a recreational pastime.

Some of these respondents relate that their livelihoods have been tied to forest lands for most of their lives, or for generations, and that they value those ways of life. They want to continue, and see their children continue, to enjoy the rural lifestyle and close ties to forest lands; they request that federal policies not be adopted which restrict their access to and use of these lands. These people sometimes add that, were it not for some national policies, natural resource industries would be thriving, forest lands would be healthier, and rural economies would not be struggling. They believe the federal government should not issue national policies regarding public land management. They say they have a right to use of these lands—a right, they believe, the government is increasingly failing to respect.

Some respondents state that the Rule is the product of biased federal rulemaking. They say it was unduly influenced by organizations having sufficient resources to wage letter-writing and postcard campaigns that they cannot compete with, and believe it was signed into law by a President intent on furthering closure of roadless areas to future active management. These respondents do not believe all the issues were looked at carefully. They ask that the Forest Service abide by the injunctions set in place by the District Judges and reevaluate local

community effects, local decisionmaking, forest health issues, and fire management. These members of the public urge the Forest Service to forego a national policy in favor of site-specific evaluation of roadless areas within the local forest planning process.

## Prominent Themes in Public Comment

### Trust and Integrity

Comments regarding trust and integrity are usually made in the context of other concerns; these comments can be found in numerous sections throughout the document. Because relatively few comments are directed solely to trust and integrity, the section in Chapter 3 which specifically addresses this topic is not large. Nevertheless, trust and integrity is one of the most prominent themes running through public comment on the ANPR.

Some respondents question the integrity of the former Administration in creating the Rule, alleging that it was created mainly to curry favor with those wishing to close roadless areas to active management, that it was ill-advised and pre-decisional, and that it was developed without adequate response or review of input from people living in close proximity to the national forests. These people state that the ANPR represents a chance to set things right (although some argue that any attempt to formulate a national rule should be abandoned). Other respondents question the integrity of the current Administration for reevaluating the Rule and possibly proposing a new one. They question why the current Administration, as they see it, has inadequately defended the Rule in court. They often state that the Administration is not fully considering the concerns of the many people who requested the Rule's implementation and is putting too much emphasis on local communities' and natural resource industries' needs and concerns.

In summary, trust and integrity issues have been and continue to be at the forefront of public comment on the proposal to establish national management protocols for roadless areas. Respondents of all viewpoints assert distrust in both the Agency and the Administration to the extent that they claim their own concerns are being disregarded or unfairly impacted.

## Process, Planning, Policies, and Laws

### *National Forest Management Act*

Some respondents urge compliance with the National Forest Management Act (NFMA). The Forest Service, they say, should comply with NFMA by providing a fair and open public involvement process; by including input from local, state, and federal elected officials; and by ensuring that forest plans are in compliance. Generally, those who stress the need to comply with NFMA say the Forest Service was not in compliance in its development of the Rule. Some, however, assert that the Agency is in compliance, inasmuch as the Rule is no different from other national-level direction that forest planning must incorporate.

In addition to general comments regarding compliance with NFMA, some comment specifically on the relationship between a possible roadless rule and the Planning Regulations. Comments include the suggestion that the Rule be implemented under the existing Planning Regulations; that roadless area regulations be coordinated with the Planning Regulations; and that decisions

regarding roadless area management be postponed until completion of the revised Planning Regulations. Respondents also comment on the revision of the Planning Regulations. Some suggest public involvement should be emphasized. Others suggest that ecological sustainability should not be given first priority in planning; rather equal consideration should continue to be given to social, economic, and ecological values. On the other hand, some respondents emphasize that revisions must not weaken existing environmental safeguards.

### *National Environmental Policy Act*

Some respondents urge the Forest Service to comply with the National Environmental Policy Act (NEPA) by including input from local, state, and federal elected officials; by providing accurate, site-specific information about roadless areas, thereby eliciting meaningful, informed comment; and by providing an adequate range of management alternatives. Some respondents assert that the Rule violated NEPA by being predetermined, and that the process went forward without adequate information upon which to comment and without taking into account significant concerns raised by the public and elected officials.

Respondents also comment about environmental analysis documents. In this regard, a number of respondents express confusion over the status of the Advance Notice of Proposed Rulemaking relative to NEPA and, consequently, over the necessity to produce environmental analysis documents. Some imply that the ANPR is a NEPA process, and their comments suggest that they believe a new EIS has been prepared. Others believe they are still commenting on EIS for the Rule. Beyond that, a number of people remark on the adequacy of the Rule EIS. They suggest that it did not present a sufficient range of alternatives; that the Forest Service should correct deficiencies or substantiate statements made in it; and that a supplemental EIS should be prepared which provides adequate maps of roadless areas and quantifies the miles of existing roads in roadless areas.

### *Interim Direction*

Some respondents comment on the interim direction outlined in the Forest Service Chief's June 7, 2001, memo to staff. Some state that this direction should be kept in place until forest plans are revised. Others state that interim direction should not be implemented. Some say it is not strong enough, suggesting that it returns the Forest Service to the situation that existed prior to the creation of the Rule, with roadless areas being managed solely through the forest planning process. Others say it is too strong—that although it does not technically rule out activities in inventoried roadless areas, in practice no Forest Service decisionmaker will enter Roadless Areas without fear of litigation or reprisals from their superiors. Therefore they consider this an illegal implementation of the Rule and say it violates injunctions placed on the Forest Service by District Judges.

### *Other Policy Concerns*

A number of respondents comment on the relationship between a possible rule on roadless area management and other planning processes. In this context, some ask the Forest Service to evaluate the cumulative effects of multiple management proposals—such as the Rule, the Planning Regulations, and the Roads Policy. Another concern is that inadequate attention was given to the cumulative effects of a national roadless rule when combined with other National

Forest System land withdrawals such as wild and scenic river areas, wilderness areas, national recreation areas, etc.

One policy often mentioned is the proposed Roads Policy. Some stress that the Forest Service should decide roadless area management only after the Roads Policy has been completed and after roads analyses have been conducted by the Forests, thereby providing better road and trail inventories, and a better understanding of what constitutes a road, how roads are to be managed, and what needs to be closed or reconstructed.

### *Appeals and Litigation*

Some respondents discuss the appeals process in general. They believe appeals are interfering with forest management and preventing the implementation of plans which were, themselves, years in the making. People suggest that time limitations be imposed on the appeals process and that litigants be required to submit to arbitration before their cases can proceed to court.

Comment varies over how the Forest Service should respond to litigation over the Rule. According to some, litigation usually arises during the site-specific decision process, so decisions made at the national level should help cut down on litigation. Others suggest that the reason the Rule is tied up in litigation now is because the Forest Service did not pay sufficient heed to public concerns expressed during that comment period. These people say the Agency should delay any decision on the Rule until judicial review, so that the impacts of proposed management can be appropriately analyzed.

### *Other Legal Concerns*

Legal issues are frequent topics of comment. A number of respondents ask the Forest Service to review the legal validity of the Rule; others assert that it has no legal validity and that the Agency should develop a new rule that complies with the law. In addition to these general comments about the legality of a national roadless rule, some address the applicability of specific federal acts. Following are concerns regarding some of the more frequently cited acts.

**Alaska National Interest Land Conservation Act (ANILCA)** – Respondents urge the Forest Service to comply with ANILCA by providing reasonable and timely access to inholdings; by excluding the Tongass National Forest from the final rule; and by, in general, foregoing sweeping national level withdrawals such as the Rule. On the other hand, at least one respondent suggests that ANILCA needs to be revised to allow ownership of private inholdings within roadless areas without the accompanying obligation to allow roaded access to them.

**Americans with Disabilities Act (ADA)** – Comments on the ADA arise most frequently in connection to access. Some respondents comment that roadless protection will negatively affect the ability of elderly or physically impaired forest visitors to access roadless areas. They claim that the ADA legally obligates the Forest Service to maintain roaded access or allow it to be developed. Others, however, downplay the legitimacy of this concern, saying there is already sufficient access and that the preservation of access for the elderly and handicapped should not be used as an excuse to build roads.

**Clean Water Act (CWA)** – Respondents state that the Forest Service must comply with the CWA by including in management plans roads that cross streams or wetlands and by obtaining

the necessary permits and exemptions for closing forest system roads. Some suggest that the CWA and the Endangered Species Act should be integrated early in the forest planning process.

**Endangered Species Act (ESA)** – Some respondents urge the Forest Service to comply with the ESA. Others, however, comment on impacts of the ESA itself. Some assert that the ESA should be eliminated in its present form because of its impact on private property rights, because of its role in closing roads, and because of its use in litigation. Some state that there are groups who use the ESA as a weapon against traditional uses of forest lands, and that the Forest Service should support legislation which would prevent litigation over the ESA and reimbursement of legal fees.

**Mining Laws** – Respondents urge the Forest Service to comply with mining laws (Mining Law of 1872 and Mining and Mineral Policy Act) to ensure access to mineral deposits in National Forest System lands and to enable this country to remain free of foreign dependence on raw materials. Others suggest such laws should be repealed to ensure protection of roadless areas.

**Multiple Use and Sustained Yield Act (MUSYA)** – Some comment that a national roadless rule would effectively eliminate multiple use management of roadless areas. Many argue that a national roadless rule should not be implemented because, under MUSYA, public lands must remain open to uses such as natural resource management and motorized recreation. Others, however, claim that multiple use does not mean that every use must be accommodated in every part of the forest and that protection of roadless areas is in keeping with MUSYA. Further, some say, the Forest Service is in violation of the Act because they see little evidence of sustained yield and believe forests have been damaged without proper restoration.

**Revised Statute 2477 (RS 2477)** – Some assert that the Forest Service must comply with RS 2477 with respect to road closures. Many respondents argue that a national roadless rule should not be implemented because it would close many roads whose status as public rights-of-way is protected under RS 2477. One respondent reminds the Forest Service that State law reserves the right to public access to all section lines, while another believes the Agency has no clear direction or policy regarding RS 2477 roads and asks the Forest Service to clarify its position, especially as it relates to roadless areas.

## Public Involvement

### *Informed Decisionmaking (Question 1)*

**Decisionmaking Authority** – The question of what informed decisionmaking requires, and who should be involved in the decisionmaking process, elicited considerable response. Some suggest the Forest Service should decide the management direction for roadless areas, rather than politicians or the public. Others recommend that Congress should manage federal lands because congressional representatives would be more responsive to constituent concerns. These respondents also believe that members of Congress would be better able to address local conditions and that a congressional decision is needed to end the present stalemate surrounding roadless area management. Others suggest decisionmaking parties include individual states, American Indians, and variously composed committees of experts.

**Local versus National Decisionmaking** – Much of the comment on informed decisionmaking addresses the question of whether roadless area management decisions should be made at the local (forest planning) level or the national level. Respondents who believe decisions should take

place through the local forest planning process say it is not the place of the federal government to issue national mandates regarding management of individual forests; that the forest planning process has worked well in the past; that it affords adequate public involvement with all interested parties; and that it allows adequate consideration of local conditions and needs. Further, some respondents comment, since local residents have more knowledge about the resources and the most to lose if a bad decision is made, it is appropriate for them to have a strong voice in management decisions.

Others say it is appropriate for roadless area management to be decided at the national level. According to these people, the local forest planning process has proven it cannot adequately protect these areas because local people tend to weigh the profit potential from commercial activities above the damage such activities may cause. They also feel that because of the importance of preserving these areas for the benefit of all Americans, decisions should be in the best interest of the whole country. Further, these respondents emphasize, these forests are national forests, thus all Americans—not just local residents—have a legitimate interest in their management and are equally entitled to have their views considered.

**The Forest Planning Process** – Opinions concerning decisionmaking roles are reflected in comments regarding the forest planning process. Those who believe roadless area management decisions should be made at the local level state that the forest planning process can and should identify local concerns, attitudes, issues, and problems that might remain unknown at the national level; consider site-specific conditions and needs of roadless areas; work with local stakeholders; and implement sustainable forest management practices, etc. In contrast, those who prefer decisionmaking at the national level claim it is appropriate for the forest planning process to adhere to the Rule and maintain maximum amounts of roadless areas.

### *Working Together (Question 2)*

The question of how the Agency can best work with all interested parties through a fair and open process involves two related issues: 1) the adequacy of the actual processes and methods used to engage the public; and 2) the adequacy of involvement and collaboration made possible by those methods.

**Processes and Methods** – In general, those who ask for implementation of a national roadless rule state that the methods used to engage the public for the Rule and the level of collaboration achieved were adequate—as contrasted, they say, with the level of involvement offered for the ANPR. On the other hand, those who ask that the Rule not be implemented generally assert that the public involvement process for that rulemaking was biased and unresponsive, and that there was insufficient collaboration.

With respect to methods used to engage the public, a number of respondents urge the Forest Service to make greater efforts to notify people of upcoming proposals. People complain that not everyone has access to the Federal Register nor the time to peruse it on a regular basis. They suggest using mass media, conducting nationwide polling, posting information on local and national web sites and providing opportunities to respond over the web site, or maintaining a current mailing list to inform people of pending management proposals.

Many people state that the public meetings held in association with the Rule were inadequate, that they were biased, scheduled at inconvenient times and places and with inadequate advance notice, conducted by officials who were ill-informed about the proposal, and lacked site-specific

information upon which to offer meaningful comment. They stress the need for an adequate comment period. Other respondents assert that the number of meetings held—over 600—testifies to the high level of public involvement encouraged in association with the Rule. These meetings were open to everyone, these people state, and everyone had opportunity to express their views. They also point to the volume of comments received for the Rule—1.6 million—as evidence that the comment period was adequate. These respondents say it is the ANPR that offers inadequate opportunity to comment.

Opinion varies over how public comment should be analyzed. Some urge the Forest Service to give equal consideration to all comments, while others urge that greater weight should be given to some parties, such as those representing local and resource-dependent interests. Some respondents argue that because some interest groups have the resources to organize form letter/postcard campaigns and others do not, the content of comment should be considered rather than the number of comments received. Others assert that everyone has an equal opportunity to submit comment and that the fact that so many respondents to the Rule request its implementation shows that most people want stricter roadless area protections. They contend that, as this is a democratic nation, the will of the people should conclude the issue.

**Public Involvement/Collaboration** – Many respondents urge the Forest Service to establish strong lines of communication to promote a better understanding in the agency and among the general public of how public land management affects natural resource dependent communities. These respondents stress the need for adequate local input and participation in the decisionmaking process, and they urge the Agency to work closely with states, counties, and local governments. They write that the Agency listens more to people who do not understand local concerns and that the Agency cares more for the environment than for the people whose lives are affected. Some believe the Rule was unduly influenced by groups of people not directly affected and that such groups should be excluded from the decisionmaking process.

Other respondents believe the Agency weighs the concerns of local residents and natural resource industries too heavily, and that their own views have not been adequately considered. Some say industrial groups should be excluded from the decisionmaking process because of their vested economic interests.

Not all comment regarding public involvement/collaboration is divided. Some respondents state that it is not wise to rely too much on collaboration to begin with, saying that it can lead to policies that are merely agreeable rather than high quality; that it is limited to solving only the easy problems; and that the time commitment it imposes makes it an unrealistic solution. A number of people point out that agreement between parties may not be possible. Others, however, urge greater collaboration with all groups, with agencies such as the U.S. Fish and Wildlife Service, and generally with all interested parties. These respondents agree that close collaboration with diverse groups will enhance the decisionmaking process by fostering cooperation and mutual trust and respect.

**American Indian Rights and Interests** – Because of the unique status of American Indian tribes and the government-to-government relation that exists between them and the U.S. Government, special care has been taken to review comments from tribes and tribal interests separately from comments of other respondents who discuss tribal interests. Accordingly, the section in Chapter 3 which addresses American Indian Rights and Interests is composed of two subsections: Comments of American Indian Tribes/Tribal Interests, and Comments from Other

Respondents Regarding American Indian Tribal Interests. (This distinction is based on how respondents identify themselves or their organization in their letters. It is possible that among comments attributed to other respondents are comments actually made by tribal members or tribal interests, but if so it cannot be determined from the letters.)

Most tribal representatives specifically ask that treaty rights be respected, often requesting consultation or special consideration, while supporting the Rule as a means of providing a measure of protection for resources such as anadromous fish populations and American Indian culture and sacred sites. Non-tribal respondents on this topic tend to be of the same mind, supporting the Rule to protect tribal interests and urging the Forest Service to give high priority to American Indian concerns. Another view is that the Rule should not be applied to reservation forests because it would negatively affect American Indians economically by restricting timber removal and recreation.

### ***Competing Values/Limited Resources (Question 9)***

The Federal Register notice for the ANPR asks, “How can the Forest Service work effectively with individuals and groups with strongly competing views, values, and beliefs in evaluating and managing public lands and resources, recognizing that the Agency cannot meet all of the desires of all of the parties?” Comments which address this question are closely related to comments on collaboration in general. Many respondents suggest that competing values be addressed through enhanced collaborative efforts by the Forest Service. Some suggest using professional negotiators, public relations consultants, and conflict resolution specialists. As noted earlier in this summary, some suggest bringing together advisory panels composed of different interest groups. Others suggest meeting with different groups both individually and collectively to develop agenda items important to all parties. According to these respondents, what is paramount is that a forum be provided in which all views are respected and compromises worked out. To that end, several respondents urge the Forest Service to make greater efforts to educate the public about public land management issues as a way of resolving conflicts. Further, respondents go on, efforts at collaboration and education will be more effective if the Forest Service first sets out to restore the public’s trust, clarifies its own purpose and mission, makes use of the best available science and information, trains its personnel to work with a diverse constituency and to facilitate cooperative meetings, and applies its policies to all interests consistently.

Some respondents remark that the best way to deal with competing values is to implement the Rule, stating that it represents the wishes of most Americans. Others state that the public involvement process used to develop the Rule did not comply with applicable laws, particularly NFMA and NEPA. These people say the best way to deal with competing values is through compliance with these laws which, they argue, dictate that competing values should be addressed at the local level through the forest planning process.

### ***Roadless Area Values (Question 6)***

#### ***Characteristics of Roadless Areas***

Respondents suggest a number of characteristics of roadless areas that ought to be taken into account, including environmental, social, and economic values (to be discussed in the following sections). One point of disagreement involves natural resource management in roadless areas. A

number of respondents believe the potential economic value of natural resources is integral to the evaluation of roadless areas. Others state that the value of these lands should not be based on the value of the natural resources they can yield. A common remark is that the values associated with roadless areas were adequately identified and considered during the course of public involvement for the Rule.

In connection with a general evaluation of roadless areas, many respondents ask that maps and inventories be updated with current, accurate information; that mapping errors be corrected; and that inventories be completed for biological features, natural resources, and existing infrastructure. Respondents also ask that certain terms be defined, such as road, road building, unroaded, and roadless area. People say they are confused over how these terms are being used.

### *Environmental Values*

Respondents offer considerable comment on the environmental values of roadless areas. Many comments reflect the need to manage roadless areas to protect and preserve environmental values. These respondents address the need for ecosystem/restoration management, the advisability of multiple use management, the effects of activities on the environment, and specific resources—water quality, air quality, soils, scenery, and wildlife.

A number of respondents state that roadless areas should be managed within an ecosystem-based framework. They believe healthy ecosystems cannot be managed at the site-specific level and are concerned that if there is not overarching direction, connectivity will be lost at the landscape level. They argue that local decisionmaking too often does not take into account other land management decisions, thus resulting in issues not being resolved in a manner they believe is sufficient. Some suggest ecosystem-based management could be furthered by allowing the public to sponsor or adopt an area of the forest or by encouraging non-profit organizations to support the preservation of pristine areas.

The topic of multiple use management arises frequently in comments addressing environmental values. As noted earlier in this summary, some respondents comment that, under multiple use management, resource use—including timber removal, mining, grazing, and motorized recreation—ought to be allowed. These respondents state that allowing any single use preference to dominate would be unfair and in violation of the multiple use mandate. They say that, per MUSYA, the Forest Service is legally obligated to manage for multiple uses. Conversely, other respondents argue that multiple use management does not mean that every use must be accommodated in every part of the forest.

Public comment regarding the effects of various activities on the environment differs as well. Some respondents claim that road building, use of natural resources, and motorized recreation damage the environment beyond the land's ability to recover. They state that mitigation efforts cannot undo much of the damage that has already occurred nor the future damage that will occur if activities such as road building and timber removal are allowed to continue. Other respondents disagree and argue that these activities do not harm the environment; in fact, some claim, they benefit it.

Some respondents ask the Forest Service to protect roadless areas in order to preserve watershed health. One point of difference in these views concerns the effects of timber removal on water quantity. According to some, removing timber increases water quantity because less dense tree

stands permit greater absorption of water. Others, however, state that timber removal does not increase water quantity and is generally destructive of natural resources.

Respondents also urge the Forest Service to protect roadless areas in order to preserve air quality; to address the effects of timber removal and road building, which they believe causes erosion and landslides; and to protect scenic resources.

Respondents offer considerable comment on the need to protect wildlife and wildlife habitat; and just as comments differ regarding the effects of activities on watershed health, so they differ regarding the effects of activities on wildlife and wildlife habitat. According to some, road building, timber removal, and motorized recreation are harmful to wildlife. These respondents comment that road building, active management of natural resources, and motorized recreation fragment wildlife habitat. Others declare that these activities do not pose the danger to wildlife and wildlife habitat that other members of the public claim. Roads, they state, do not impede wildlife movement; vehicles do not disturb the wildlife; and removing timber, particularly in the form of thinning, benefits wildlife by promoting plant growth and feed for wildlife and birds.

### *Social Environment and Values*

Respondents make a number of points regarding the social values they associate with roadless areas and the management direction the Forest Service should take to protect these values.

People urge the Agency to protect these areas for their natural grandeur and beauty; for their intrinsic value; for what they represent to America, especially the western experience; and for their contribution to quality of life. People say roadless areas are needed as refuges from the stresses of urban life; and as places to find solitude, natural quiet, spiritual renewal, and to spend time with their families. They point out that with our increasing population and growing urban/suburban sprawl, roadless areas are needed more than ever to serve as respites from the press of humanity and all of the usual demands of life. Other respondents say that preserving these values requires that the Agency not give these areas special roadless protection. These people argue that roadless protection threatens western traditions and culture; that it unfairly restricts motorized users' ability to enjoy these areas; and that, by restricting motorized access, it restricts the ability of family groups—which include people of all ages and physical abilities—to use these areas, thereby reducing family stability and togetherness.

Respondents also ask that these areas be protected through a strong national rule for the sake of future generations (a particularly frequent assertion); for their educational value; and for their value in promoting human health and welfare through physical and emotional rejuvenation.

### *Economic Environment and Values*

Comment on the economic values associated with roadless areas covers a wide array of topics. Respondents address the adequacy of analysis of economic factors; the effects of roadless protection on local communities/economies, including employment and tax receipts; effects on the global economy; effects on the mining, oil, and gas industries; and government subsidies.

Some respondents question the data, methods, and models used for the economic analysis in the Rule EIS. They urge the Forest Service to conduct adequate cost-benefit analyses before issuing a new rule; and some state, in particular, that the Agency should use the most up-to-date economic valuation tools for ecological valuations as well as other non-market values. People

also ask the Agency to assess and consider the resource damage from commodity uses, to consider commercial interests of local areas, and to quantify recreation-based data for all roadless areas.

Respondents addressing economic issues differ over the impacts of roadless protection on local communities and their economies. Some argue that the protection of roadless areas will greatly benefit local economies because roadless areas are coming to be more highly valued for their pristine condition than for their developable natural resources. They thus stress the importance of these areas to the tourism industry in general—particularly to recreational non-motorized users, the mountain biking community, recreational fishing and hunting, outfitter-guides, the outdoor gear industry, and commercial fisheries—and to companies seeking locations which provide a high quality of life. Others, however, assert that roadless protection will negatively impact local economies. These respondents state that restrictions on road building and timber removal will harm natural resource-dependent rural communities, mining-dependent communities, timber-dependent businesses, the motorized recreation-dependent tourism industry, and the homebuilding industry. They state further that low-wage recreation-based jobs are no substitute for commodity-based high-wage ones.

Some respondents who comment on the impacts on local communities/economies specifically mention the tax receipts made available to local communities from resource management activities. Some assert that resource management should be allowed to continue, to maintain tax receipts from timber removal and minerals royalty payments. This revenue, they say, is vital to local economies and an important source of funding to local schools. Others, however, suggest that the rural school financing system should be reconsidered and changed to reduce the need for high timber removal levels.

Comments on the impacts of roadless protection to the global economy typically take one of two forms. Some state that restricting natural resource development, as well as exporting our natural resources, leaves us too dependent on foreign resources. These respondents conclude that the Forest Service should encourage domestic development of natural resources. Other respondents suggest that if domestic timber removal is restricted, it will likely be carried out in other countries which have lower environmental standards than ours and thus contribute to environmental degradation on a global level.

Some respondents urge the Forest Service to consider the impacts of roadless protection on the mining industry, employees, and mining-dependent communities. In this context, they mention a number of specific areas and operations which would be negatively impacted by such protection. The main gist of these comments is that restrictions on roaded access would restrict mineral discovery and management, and that these restrictions would so disrupt the ability of mining companies to carry out their operations as to impose significant economic hardship.

Finally, a number of commentators address subsidization of private industry, particularly the timber industry. Respondents assert that subsidization by the federal government gives timber companies operating on public lands an unfair advantage over private forest owners. They say that below-cost timber sales are unfair to taxpayers—using as an example their understanding that the United States faces budget deficits and that tax dollars are needed for other programs—and that such sales require roads that the Forest Service lacks the funding to maintain. They say the Forest Service should consider all relevant factors in timber sale decisions and require timber

companies to cover the full cost of any road construction, removal, or restoration that is found appropriate.

## Forest Management

### *Activities (Question 7)*

**Travel Management** – A number of respondents comment on the road and trail systems in national forests. Some suggest that the entire road and trail systems be evaluated to determine long-term management needs; which existing roads are needed, where new roads should be built, and which roads should be obliterated; and the environmental effects of existing routes. People also say roads and trails should be adequately maintained, and some suggest that the Forest Service should seek the assistance of motorized recreation groups in maintaining these travelways. Responses vary, however, over the question of whether new road construction ought to be allowed and whether existing roads ought to be closed.

Some respondents assert that road construction ought to be allowed in roadless areas. Common reasons cited are the Agency's general obligation to provide adequate access to citizens, including the disabled; the need to allow resource-dependent communities to use forest lands without undue governmental obstruction; the need to disperse recreation, and thus offset the environmental impacts which would follow from concentrated use in other areas; and the need to maintain an adequate infrastructure for forest management activities, primarily forest health treatments. Other respondents who comment on this topic, however, state that road construction should be prohibited in roadless areas. They say that roads lead to increased activity in general and increased natural resource management in particular; that roads provide an avenue both for abusive human behavior and for invasive species; that they lead to increased mortality of endangered species; and that both environmental and human well being require the existence of untouched, pristine areas. These respondents believe access to forest lands is adequate, and more is not needed.

The question of road closures does not generate the same level of comment as the question of new road construction. In general, those who request that new road construction be prohibited also request that roads be obliterated under certain conditions. Primarily, they ask that all user-created routes be obliterated and natural conditions restored. Those who request that new road construction be allowed generally ask that no roads be closed, for the same reasons that new road construction should be allowed.

**Natural Resources Management** – The management of natural resources is a topic which generates a good deal of comment. As mentioned before, some believe the Forest Service should encourage natural resource management, and assert that such active management can occur in roadless areas without harm to the environment or to wildlife. Others urge the Agency to resist pressure to manage roadless areas, both because of the public support for the Rule and because they believe industrial activities and preservation of roadless values are mutually exclusive. While respondents comment on virtually all areas of natural resource management, recurring topics are timber removal and mining.

A number of individuals and organizations believe timber removal should be allowed in roadless areas. Many cite reasons why it should be allowed—to maintain forest health; to supply the wood products central to American culture; to avoid dependence on foreign countries for these

supplies; and to support resource-dependent communities. Other people, while asking that timber removal be allowed, suggest preferred harvest methods to reduce negative environmental effects. These suggestions revolve primarily around removing trees without the use of roads; harvesting in already roaded areas; selectively removing or thinning; and requiring replanting following removal.

Many of those who address timber removal that it be completely prohibited in roadless areas, or that it be prohibited or severely restricted in general. These respondents state that the environmental cost of timber removal is too high, in the form of erosion, siltation, and wildlife habitat disruption. Generally, these respondents say that timber removal should be allowed only when genuinely needed for forest health treatments or to protect communities and human life. With respect to forest health, however, some state that wildfire and insect and disease outbreaks are natural occurrences, and that forests left to experience these natural influences will be healthier in the long run.

Comments are mixed over mining, oil, and gas development. A number of respondents state that the Forest Service ought to provide substantially more analysis of the impacts of national roadless protection on mineral development than was provided in the Final EIS for the Rule. These respondents urge the Agency to address oil and gas resource potential in National Forest System lands in general and in roadless areas in particular; to address effects of the Rule; and to address the legal obligation to allow access—especially roaded access—for mineral exploration and development. These respondents argue, as do those who request that timber removal be allowed, that continued mining is needed to supply the mineral products and energy sources central to American society; to avoid foreign dependence; and to support natural resource-dependent communities. Likewise other commentors, while asking that mining be allowed, suggest preferred methods to reduce environmental effects. These suggestions include, for example, drilling by manual means only, slant drilling, or other techniques which do not disturb the surface.

Of those who comment on mining, however, many state that it should be prohibited in roadless areas. Generally respondents say they want mining prohibited for environmental reasons. Some allege that many impacts from mining are unnecessary because they are associated with mining claims that are either invalid or do not support the discovery of mineral deposits.

**Recreation Management** – The topic of recreation management generates a fair amount of comment. Some respondents urge the Forest Service to provide the maximum amount of recreational opportunities possible in concert with protecting the environment. Some ask that the Rule not be implemented on the grounds that the Agency failed to adequately address its effects on recreation, and say that it would overly restrict recreational uses. Others state that the Rule achieves an appropriate balance of uses and that restrictions in roadless areas are necessary and justifiable. Other points of difference are over what types of recreation should be allowed in roadless areas and how various recreational uses should be restricted. While respondents offer comment on virtually all forms of recreation, they comment most often on motorized recreation (including off-road vehicles and, to a lesser extent, snowmobiles), followed by hunting/fishing and ski area development/expansion, respectively.

Many respondents write that motorized recreation is a growing pastime in this country and that it has become a much loved tradition in their own families. They explain that it allows entire families—including members of all ages and physical abilities—to enjoy the outdoors together,

and to enjoy it within the short timeframes made necessary by busy working schedules. These respondents assert that motorized recreation, engaged in responsibly, is not a threat to the environment or to wildlife, and ask that no more restrictions be placed on their form of recreation. Many others who address this topic request that motorized recreation be banned entirely from roadless areas, and often ask that it be prohibited or severely restricted in the rest of the forest as well. These respondents feel that the impacts to the environment and to wildlife are too serious to allow unrestricted use of this form of recreation. Other respondents advocate a middle ground with respect to motorized recreation. Some who ask that it be restricted acknowledge that it is here to stay and must be accommodated in certain areas and subject to restrictions; others who say it should be allowed likewise acknowledge the need for some form of regulation.

Of those who address hunting and fishing, many say these activities should be allowed to continue—for their recreational value, as tools for wildlife management, and to meet subsistence needs. Some believe, however, that hunting and fishing should be prohibited in roadless areas because they think they are not effective management tools and that restrictions are poorly enforced.

Those who address the topic of ski area development/expansion state that development and expansion should be allowed to continue because there is a growing demand for winter recreation, and because ski area operations can be compatible with roadless protection. Others oppose expansion, saying a need has not been demonstrated.

### *Designating Areas (Question 8)*

At issue is the question of whether inventoried roadless areas should be recommended to Congress for wilderness designation, or whether they should be maintained under a specific designation for roadless area management in forest plans. Many respondents who address this topic say Question 8 misrepresents current policy, which does not impose an either/or decision, and believe it inflames public debate over wilderness acreage, which, as they point out, is a separate issue from the Rule. A number of individuals write in a short ‘vote’—such as recommend all roadless areas for wilderness or no more wilderness. Others provide suggestions for evaluation criteria and various management designations for these areas. Given this wide range of comment, only broad trends can be summarized here.

Comment on this issue sometimes reflects an underlying confusion, both with respect to use of the term wilderness and to the process by which areas are officially designated as wilderness. With respect to use of the term, many respondents—whether commenting specifically on this issue or on others—speak of the need to protect wilderness areas. Often it is clear from the context of these comments that the respondent is not speaking of designated wilderness areas, but simply of wild, undeveloped areas; but sometimes the writer’s intent is not clear. With respect to designation, many respondents seem to be unaware that wilderness designation is made by Congress, and assume it is made by the Forest Service. Care has been taken to capture the writer’s concern as accurately as possible while avoiding reading into a comment a meaning that was not clearly intended. With that caveat in mind, some themes can be identified regarding public comment on wilderness and roadless designation.

A number of respondents urge that all roadless areas should be recommended to Congress for wilderness designation, stating that only a wilderness designation can adequately protect these

areas. Others suggest that all qualifying roadless areas be recommended; and some state that additional recommendations should be made strictly on a site-specific basis based on local condition, need, and input. Other respondents urge the Forest Service not to recommend roadless areas for wilderness designation, stating that a wilderness designation is too restrictive and that there are already enough wilderness areas. Both those who request more wilderness designation and those who request no more wilderness designation mention specific areas they say either should or should not be recommended. Finally, respondents suggest specific criteria for wilderness recommendation based on ecosystem considerations, location, and acreage; and suggest various management alternatives for areas which do not meet wilderness criteria, ranging from special roadless area management to withdrawal from roadless status altogether to allow more use of these areas.

This same range of beliefs is displayed in comment on roadless area designation as well. Many who address this topic urge the Forest Service to manage roadless areas under a specific roadless management designation which would protect these areas without imposing the same level of restrictions as that of wilderness management. Others suggest creating multiple roadless prescriptions that could be applied based on site-specific conditions, or allowing forest plans to modify roadless management prescriptions. On the other hand, some urge the Forest Service not to create a specific roadless area designation at all—because conditions and situations vary too much for such a designation to be needed or workable; because the mere presence or absence of roads is not sufficient justification; and because it will strain forest budgets. Others say simply that the Agency should not designate any additional roadless areas, primarily because they believe it will negatively impact recreational access. Respondents also suggest specific criteria for roadless designation based on ecosystem considerations, existing infrastructure, inventory status, and acreage. Finally, some respondents urge the Forest Service to use appropriate existing management categories to protect roadless qualities, or to develop other new management categories.

A number of people suggest that specific areas be included in, or excluded from, roadless area protection. One specific area of note is the Tongass National Forest. According to some, the Tongass should be excluded from a national roadless rule because its inclusion would be contrary to Alaska state and federal laws; because of the time and effort that has gone into development of its recently revised forest plan; because active management is necessary to preserve the environment and forest health; and because communities depend on timber from these areas. Many others who address this topic state that the Tongass should be included in a national roadless rule because of the area's social values; because local businesses, fishing, and tourism industries depend on the area's wild characteristics; and because protection is necessary to preserve the environment and environmental values such as biodiversity, old growth, fish and wildlife habitat, etc.

## **Protecting Forests, Communities, and Private Property Access**

### *Protecting Forests (Question 3)*

Many people offer general comments on this topic or stress the need for more in-depth analysis, particularly with respect to fire management and management of insects, disease, and noxious plants. People assert either “active” management or “ecosystem/restoration” management will

best maintain forest health. These different assertions stand out in comment on roads/roaded access and selective timber removal for forest health purposes; on strategies for managing fire; and on strategies for managing insects, disease, and noxious plant and invasive species spread.

Many respondents urge the Forest Service to allow road construction/roaded access for forest health management, including fire hazard reduction and pest management. Others state that forest health should not be used as an excuse to build roads in roadless areas. These parties say roads are not necessary—that roadless areas can be accessed by other means—and that roads actually spread disease and noxious weeds.

These same assertions are found in comments on timber removal. Many urge the Forest Service to allow timber removal to reduce the risk of wildfire, insects, and disease. Suggested methods include salvage timber removal and thinning. Conversely, others state that forest health should not be used as an excuse to harvest timber because removing timber actually increases fire risk and severity. These respondents specifically urge the Agency to stop timber removal.

Likewise, some suggest that fire management strategies should include multiple techniques, such as monitoring, grazing, prescribed burns, the construction of firebreaks, and maintenance of existing fire trails. Some suggest the Forest Service should actively suppress forest fires because letting forests burn is not environmentally responsible. Other respondents assert that wildfire is a component of a healthy forest. These respondents state that natural fire maintains diverse forests and wildlife habitat; that it rejuvenates ecosystems; that dead timber is a critical part of the forest ecosystem; and that firefighting is a waste of money, dangerous, and more harmful to the environment. They conclude that the Forest Service should not suppress forest fires.

A number of respondents request that the Forest Service actively work to control insects, disease, and the spread of noxious plants. Suggested methods include timber removal, prescribed fire, the use of chemicals and other solutions, etc. Others say the Forest Service should acknowledge that native insects and diseases are part of a healthy ecosystem—that they are vital to ecological sustainability and biodiversity, and play an important role in forest nutrient cycling and renewal. These respondents urge the Agency not to use pesticides and herbicides and rather to rely on natural remedies, to prohibit road construction in roadless areas, and to encourage a proliferation of songbirds and other species that feed on insects.

### *Protecting Communities (Question 4)*

A number of respondents comment on the question of how to protect communities and private property near inventoried roadless areas from natural events. Topics include land use ordinances and building codes, management of the urban-forest interface, and the question of whether the Forest Service or private property owners should bear the major responsibility for private property protection.

Of those who address private property protection, some believe that people should not be allowed to build in areas adjacent to public land at risk of wildfire. They suggest the Forest Service promote land use ordinances which keep residential development away from public lands. Others advise that insurance companies could do much to either discourage development in high risk areas or to encourage safer development. Suggestions include either increasing rates or refusing coverage for homes built in locations at risk of wildfire; offering reduced rates to those that meet fire danger reduction standards; and making private developments in these areas

generally less qualifiable for recovery insurance. Some also suggest that building codes should be revised to set a standard for construction in fire-prone areas.

With respect to management of urban-forest interface areas, some people suggest the Forest Service establish buffer zones between private property and roadless areas, or that communities be allowed to construct such zones. Other respondents urge the Forest Service not to fragment roadless areas by constructing buffer zones; and according to one respondent, the Forest Service should recognize that extensive vegetation management in forest-urban interface areas does not reduce potential home fire losses.

Respondents suggest various actions the Forest Service can take to better protect private property from natural disasters—thinning dense stands or clearing hazardous materials near communities, conducting prescribed burns, establishing quick response procedures, providing local water access for fire hoses, etc. In particular, some suggest the Forest Service should educate private property owners regarding the dangers that exist in roadless areas and the steps they should take to protect their property.

Some comments on this topic express that it is, or should be, incumbent upon private property owners to build away from high-risk areas and to employ building standards and materials designed to lower the risk of fire damage. Some respondents argue that fire protection provided to communities and homeowners should be paid for by the private property owners, not by taxpayers. In summary, some respondents say the Forest Service should bear the cost of replacing private property damaged by wildfire, but others believe the property owner should be financially accountable for his/her choice to build in high risk areas.

### *Protecting Access to Property (Question 5)*

While respondents offer a number of general comments on this issue, most specific comment centers around access to National Forest System lands through private property and access to private property through National Forest System lands.

Some people urge the Forest Service to prevent public lands from being landlocked by private lands. They say that when that happens, traditional access routes are sometimes closed by private property owners, which they believe effectively turns the enclosed public land into a private preserve from which the general public is barred. Thus respondents urge the Agency to maintain public rights-of-way through private property.

Many comments on access to property address access through public land to private land. A number of people believe this is a non-issue. They say that since access is protected by existing law, the Rule has no impact on access to inholdings; they question whether more is being addressed in Question 5 than just reasonable access. Much comment on this topic consists of suggestions by which access can or should be maintained, ranging from maintenance of existing roads to airstrips and helispots. People also point to the local planning process and collaboration with local officials as effective ways of addressing access issues.

## **Conclusion**

Some respondents emphasize protection and preservation; they emphasize the need to allow natural systems to operate without human intervention and believe restrictions on active management of roadless areas will be most effective if imposed at the national level. They

request implementation of a national roadless area management policy that lays down strong restrictions from which no individual forests are exempt. Other respondents emphasize active management of natural resources; they emphasize the knowledge local citizens have of forest conditions and believe that management decisions can best be made at the local level. They request continuation of local decisionmaking, which allows for different management prescriptions for different roadless areas depending on condition and need. These different viewpoints are evident in nearly all the comments offered on the ANPR.

Most respondents express concern for and love of national forest lands. While some advocate taking a hard stance for their positions, others acknowledge that people who care deeply about the land can honestly disagree about how it should be managed and believe that a degree of compromise is necessary.

# Chapter 1

## Introduction to National Roadless Protection Rulemaking

This chapter includes two main sections: National Roadless Protection – General Remarks, and Issue Identification.

### National Roadless Protection – General Remarks

This section includes two subsections: Need For a National Roadless Rule General and Need for the Roadless Area Conservation Rule.

#### Need for a National Roadless Rule General

##### Summary

A number of respondents question the need for a national roadless rule. They wonder why the Forest Service does not simply continue guidance under existing law, where they believe that the National Forest Management Act (NFMA) provides both guidance and opportunities for public input on a forest by forest basis, hence the Agency should not need a national policy. Some also point out that environmental laws are already in place, obliging the Forest Service to manage their jurisdictions in accordance with these laws. Others suggest the Forest Service delay development of a new rule until judicial resolution of the current Roadless Area Conservation Rule or until the forest plan revision process takes place.

Other respondents assert that a national roadless rule is needed. One of the most common reasons given for needing one is they believe the current forest planning process has failed to protect the environment in the past (see Chapter 3: Informed Decisionmaking (Question 1): Local vs. National Decisionmaking: *National Decisionmaking*

#### 1. Public Concern: The Forest Service should clarify the need for a national roadless rule.

We are still mystified why the Department needs a new rule at all. The National Forest Management Act (NFMA), an existing law, clearly provides for public input to forest plans on a forest-by-forest basis. NFMA provides for a public involvement process (local, regional, and national) whereby anyone interested in the management of a particular [forest] can comment on, and be directly involved in, the management of those lands. (Elected Official, Fremont County, ID - #A4942.20201)

You should also seriously consider whether this entire process is really warranted. The Forest Service is perfectly able to manage the lands it controls under its existing management prescriptions. Another Washington based management directive is duplicative of existing powers, a waste of time and money and will never take the place of local management. (Organization, Steamboat Springs, CO - #A18447.10112)

**BECAUSE EXISTING LAW ALREADY MANDATES ENVIRONMENTAL PROTECTION**

An area of concern to many is the area of environmental protection afforded the Forest Service lands. Environmental protection is currently mandated and governed by many federal laws with jurisdiction on Forest Service lands—the Clean Water Act, Clean Air Act, and numerous other laws governing environmental activity on public and private property. Additional protection in the form of “roadless” areas is not warranted nor justified. (Business or Association, Novato, CA - #A17652.10112)

**BECAUSE EXISTING LAW ALREADY PROVIDES FOR ADEQUATE PUBLIC INVOLVEMENT IN FOREST MANAGEMENT DECISIONS**

As forest users and outdoor enthusiasts we are used to providing input on forest service plans and projects. We did so on the original roadless area proposal. Imagine our surprise when the Clinton administration released its top-down, government-knows-best roadless proposal. None of our comments were considered in that proposal. That Roadless Rule flew in the face of NEPA and NFMA direction for obtaining public input. In fact, we are still puzzled why the Department needs a new rule at all. The National Forest Management Act (NFMA), an existing law, clearly provides for public input to forest plans on a forest-by-forest basis. NFMA provides for a public involvement process (local, regional and national) whereby anyone interested in the management of a particular forest can comment on, and be directly involved in, the management of those lands. (Organization, Saint Anthony, ID - #A13225.20200)

*Develop a National Roadless Rule*

**2. Public Concern: The Forest Service should develop a national roadless rule.**

Why do we need roadless areas? You’ll get as many different reasons as there are people: spiritual, wildlife and wildlife habitat, fisheries, water quality, tranquility, soils, intact ecological processes, freedom, wildness. The list could go on. Separately, these are good reasons; however, taken together, the reason becomes overwhelming. The American public, whether they live next to a roadless area or in a large eastern city, wants roadless protection. Protecting roadless lands means no roads, no logging, no ORVs, no mining, period. Our roadless lands don’t need protection from fire or insect and disease, they need protection from human intervention, which has done more in the last fifty years to throw our forestlands out of whack than Nature could ever do. (Organization, Missoula, MT - #A21359.10111)

**BECAUSE ONCE THESE AREAS ARE GONE THEY’RE GONE FOREVER**

I hike in wilderness areas all over New Mexico as often as I can. I raft several times a year through wilderness areas in Colorado. The beauty and peace of these areas is unsurpassed. The bounty of the wildlife living in these areas is also a thing of wonder. Once these areas are gone they can never be reclaimed. Wilderness areas are what make our country so unique, and are part of our heritage. (Individual, No Address - #A4648.10111)

If these lands are protected now, future decisions under different conditions could change land designations as needed. If roads are allowed now, there is no turning back. The USFS and US taxpayer cannot continue in the business of subsidizing local resource based economies that refuse to move into the 21st century. The whole world is changing a lot. If small towns aren’t willing to change also, too bad. Keep in mind that this country will likely be around for a long time while our population continues to grow. If we do not stop this road building now, there will not be nearly enough roadless land around to meet our needs when our population reaches 400 or 500 million, as we are well on the way to doing. Once these lands are roaded, you can NEVER go back! (Individual, Boise, ID - #A8715.10111)

My family, and I regularly seek out these roadless areas. So much of the backcountry is currently taken over by off-road vehicles, extraction industries, and development. We need these last roadless areas to be protected before they are gone forever. (Individual, Helena, MT - #A5298.10111)

**BECAUSE INDIVIDUAL STATES ARE UNABLE TO ADEQUATELY PROTECT ROADLESS AREAS**

Most of this land is in the rural West and our western politicians, like our current president, are a little too accommodating to the oil, timber, and mining industries. This is the reason we need federal protection of these areas. Our western leaders in their quest for “states rights” seem to have forgotten that the balance of power between Federal state governments was “hardwired” into the constitution by America’s founders, who brilliantly recognized that the sharing of authority among state and federal governments would allow each to make its separate contribution to the building and sustaining of the country and its citizens. It is called federalism and it works.

Besides, many of the Federal programs currently in existence were created to achieve what the states have been unable or unwilling to do on behalf of their citizens. (Individual, Ketchum, ID - #A7766.12200)

**BECAUSE MOST NATIONAL FOREST SYSTEM LANDS ARE ALREADY MANAGED FOR MULTIPLE USES**

In Idaho, we have over 8 million acres of unprotected roadless lands in need of protection. By far, the majority of National Forest lands are already open to multiple use management, and the remaining National Forest roadless lands, which make up less than 3% of lands in the United States, deserve the greatest protection that can be afforded in order to ensure their preservation as intact, virgin ecosystems that will provide clean water, air, wildlife habitat, and undisturbed recreation opportunities for future generations. (Individual, Idaho Falls, ID - #A1330.10111)

**BECAUSE ROADLESS AREAS ARE NEEDED TO PRESERVE ENVIRONMENTAL AND HUMAN VALUES**

Roadless areas are the more remote sensitive areas of the United States. Activities from extraction industries often have greater impacts in these areas. Clearcutting and roadbuilding in these areas may produce flooding, erosion, landslides, and stream silting. I urge you to leave these areas wild in order to safeguard water recharge areas, species diversity, and air pollution filtering. (Individual, Westminster, MD - #A1604.10111)

We need the freedom, and resources, to get lost in the beauty of nature. We are quickly running out of such places. Forest areas need to be preserved. Logging should be banned in the roadless areas. These tracts of forest need to be protected, as they provide protection for wildlife. They also provide clean water and help to clean the air. (Individual, Rochester, NY - #A3718.10111)

I support roadless protection because roadless areas protect water quality for fishing, swimming, drinking, and life. As stated earlier, roadless areas function as biological strongholds for rare wildlife, provide large, relatively undisturbed landscapes important for protecting the greater ecosystem, present opportunities for healthy exercise, recreation, and solitude, and offer opportunities for scientific study and research. (Individual, Seattle, WA - #A4885.10111)

As a seasonal wilderness ranger, avid outdoorswoman, and an American citizen I use National Forest land to cross country ski, hike, mountain bike, camp, fish and most importantly to learn. I have learned that a healthy forest has a diverse biological make-up that I have fortunately witnessed as a brown bear dined on salmon. I have learned that National Forest land is the primary provider for Americans’ clean water. I have also learned the value of peace and solitude on extended hikes or travels that have revived my spirit. For these reasons and several more is why our remaining roadless National Forest Land should remain roadless. (Individual, Juneau, AK - #A13354.10110)

**BECAUSE THE MAJORITY OF CITIZENS ENJOY USING ROADLESS AREAS**

From a purely economic standpoint, roadless land provides far more short and long term returns than does extractive practices. This is evidenced by a couple of simple observations:

National Parks and Wilderness areas are under ever-increasing pressure due to crowding/over-use. Indeed many areas have had to go to a reservation system (see Alpine Lakes Wilderness Area in my area) to limit the number of people. Clearly the majority of citizens of this country enjoy using roadless land and are even willing to pay for it (the trail-head user fee now imposed by the USFS). (Individual, Seattle, WA - #A4885.10111)

### TO SETTLE CONTROVERSIES REGARDING ROADLESS AREAS

On many national forests and grasslands, roadless area management has been a major point of conflict in land management planning. The controversy continues today, particularly on most proposals to harvest timber, build roads, or otherwise develop inventoried roadless areas. The large number of appeals and lawsuits, and the extensive amount of congressional debate over the last 20 years, illustrates the need for national direction and resolution and the importance many Americans attach to the remaining inventoried roadless areas on National Forest System lands (FEIS Vol. 1, 1-16). These disputes are costly in terms of both fiscal resources and agency relationships with communities of place and communities of interest. Based on these factors, the agency decided that the best means to reduce this conflict is through a national level rule.” (Organization, Plymouth, MN - #A7116.16000)

## *Do Not Develop a National Roadless Rule*

### 3. Public Concern: The Forest Service should not develop a national roadless rule.

#### BECAUSE CURRENT LAW ADEQUATELY PROTECTS THE ENVIRONMENT

An area of concern to many is that of environmental protection regarding Forest Service lands. Environmental protection is currently mandated and governed by many federal laws with jurisdiction on Forest Service lands, including but not limited to the Clean Water Act, Clear Air Act, and numerous other laws governing environment-related activity on public and private property. Additional protection in the form of “roadless areas” is unjustified: it is duplicative and unnecessary. (Individual, Reno, NV - #A20857.20000)

#### BECAUSE THE NATIONAL FOREST MANAGEMENT ACT ALREADY ADEQUATELY PROVIDES FOR PUBLIC INPUT

The Clinton roadless rule was an abomination and an affront to our constituents and us. We are relieved to hear Secretary Venemon is going to reexamine the rule.

We are still mystified why the Department needs a new rule at all. The National Forest Management Act (NFMA), an existing law, clearly provides for public input to forest plans on a forest-by-forest basis. NFMA provides for a public involvement process (local, regional and national) whereby anyone interested in the management of a particular forest can comment on, and be directly involved in, the management of those lands.

Former President Clinton chose to override that public involvement process with a top-down, Washington-knows-best approach. In effect, he chose to impose his own values on the rest of us. As a result there are now 8 lawsuits, involving 7 states, in 6 federal districts, and 4 federal circuits. The federal judge hearing the case in Idaho stopped implementation of the rule, saying it was “fatally flawed”. It appears to us, therefore, that the Clinton rule need only be set aside and we can return to the public involvement process for forest planning. That is the long and short of our input. We will respond to your 10 questions, but they will be largely redundant because our answers tie directly back to this point: **GET RID OF THE CLINTON RULE; REINSTATE NFMA.** (Elected Official, Clark County, ID - #A23504.20201)

#### BECAUSE THE COURTS HAVE ESTABLISHED THAT NATIONAL FORESTS ARE NOT WHOLELY DEDICATED TO RECREATIONAL AND ENVIRONMENTAL VALUES

This national rulemaking attempt, in addition to completely sidestepping NFMA planning requirements, considers only land preservation alternatives (with the exception of the no-action alternative) and ignores the multiple-use mandate that the Forest Service must follow. The courts have separated the sustained-yield and multiple-use mandate of national forests from other Congressional mandates, such as national park management, and have clearly distinguished national forests as being not wholly dedicated to recreational and environmental values. (Tribal Corporation, Anchorage, AK - #A20340.20202)

**BECAUSE FORESTS ARE IN BETTER SHAPE NOW THAN AT ANY OTHER TIME IN RECENT HISTORY**

I believe this whole exercise is unnecessary. The forests are in better shape now than they have ever been within recent history, further restrictions are unnecessary. (Individual, Tustin, CA - #A20777.10112)

**BECAUSE THE AGENCY ALREADY HAS ENOUGH REGULATORY CONTROL AND MANAGEMENT AUTHORITY TO PROTECT THESE AREAS**

The proposed regulations were only an attempt to limit legitimate development and use by certain commodity producers such as those in mining, and timber and food production as well as to limit access and use by off-highway vehicle users. The Forest Service already has more than enough regulatory control and management authority to control and protect areas within National Forests. Travel management plans can achieve many of the same results. The only thing travel management cannot do is prohibit legitimate and legal development and use of natural resources such as timber and mining. Under the proposed regulations almost any area could be designated roadless regardless of its current use and available access. The approach taken in the Roadless Rule again undermined the Forest Service's credibility to effectively work with local communities and has further eroded the trust and confidence Lander County has in the agency to manage natural resources. (Elected Official, Lander County, NV - #A27730.12230)

**4. Public Concern: The Forest Service should delay development of another national roadless rule****UNTIL JUDICIAL RESOLUTION OF THE ROADLESS AREA CONSERVATION RULE**

A finding that the 2001 roadless area rules are invalid could change the type of roadless area proposal that this Administration chooses to advocate and adopt. If the Administration's roadless area initiative is compared against the baseline of the roadless area uses allowed under the controlling forest plans (rather than the baseline level of protection under the invalid January 2001 roadless area rules), the Forest Service may have more room to adopt measures that include greater preservation of roadless areas than the forest plans provide for, but which allows for more forest health protection and developmental uses than under the January 2001 roadless area rules.

The Forest Service and this Administration would be exposed to greater public criticism: (1) if it starts with one roadless regulatory proposal, then shifts course after the roadless area rules have been invalidated in court; and (2) requests public comment several times on different rulemaking proposals, and NEPA, and RFA compliance documents.

Thus, the public interests in efficient government, in not wasting the public's time in commenting on likely-unlawful proposals, and in legal certainty all favor obtaining judicial resolution of the roadless cases before the Forest Service proceeds too far on another roadless rulemaking proposal. (Association, Kalispell, MT - #A20940.20000)

**UNTIL FOREST PLAN REVISION PROCESSES TAKE PLACE**

The Roadless Initiative is not following the regulations of 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 thwarted the national forest planning process. The Forest Service should wait until the Gila National Forest planning process to consider such a substantial withdrawal of multiple use lands. (Manager, Sierra County, NM - #A22059.20201)

**Need for the Roadless Area Conservation Rule****Summary**

**General Comments** – Some respondents state that the Forest Service should clarify the need for the Roadless Area Conservation Rule since, they say, it does not address the stated purpose and need and prove there should be a nationwide ban on road construction.

**Implementation of the Roadless Area Conservation Rule** – People comment on whether or not the Roadless Area Conservation Rule should be implemented as is, revised, or eliminated all together. The reasons given are numerous and varied. Some respondents state that the 2001 Rule meets the five principles of roadless conservation. Furthermore, they believe the current Rule adequately addresses the issues of fire management, forest health, access, and local input, so do not think there is a need to revise the current Rule. Others believe the Rule did not adequately address these principles at a local level, so consequently the Rule needed to be re-opened for public input. These principles included; informed decisionmaking, collaboration, forest protection, private property protection and ensuring legal access (see Chapter 3: Informed Decisionmaking (Question 1): Local vs. National Decisionmaking: *National Decisionmaking*).

Respondents also question the need to repeat the process due to allegations that there was not enough opportunity to comment last time around. According to these respondents, the time spent on public involvement for the draft Rule was more intensive than the current ANPR 60-day comment period. These respondents also felt that being asked to comment on 10 questions indicated that those answers would be given more weight than simple comments about roadless policy in general. They also question the objectivity of the 10 questions and assert that the majority should prevail, regardless of specificity. Respondents also disagree with what they believe the Forest Service is saying about not having any local and State support for the Rule.

Respondents also assert that revisiting this process will have several negative effects. First, they say, it will be a waste of taxpayer money. Others say that revisiting the Rule will weaken public trust in the federal government in general, and in the forest planning process in particular. They question why their concerns were not heard during the first two go rounds of comment.

Other respondents request that the Rule not be implemented. Just as those who ask that the Rule be implemented question the motives behind the current process, those who ask that it not be implemented question the integrity of the previous roadless process. Several say the Rule was developed using emotion, not logic, or based on subjective reasoning. Respondents question the validity of the Rule since, they assert, it lacks site-specific information. Some point out that they believe there is a lot of information available to the Agency that the previous process did not avail itself of.

Some respondents believe the government is intruding into their geographical part of the country and their way of life, while other individuals state that the existing Roadless Rule does not adequately consider effects of fire fighting, public safety, access to private property and still others write that policies and regulations, in place prior to the Roadless Rule, were adequate for forest health and conservation.

Finally, one respondent advocates that inadequate road maintenance funding should not be used as a reason for implementing the Rule. This respondent suggests that other alternatives, such as requests for additional funding for roads from Congress, or allowing road maintenance by the private sector, should be considered and published for public comment.”

**Revision of the Roadless Area Conservation Rule** – Individuals who suggest revising the Roadless Area Conservation Rule request fewer restrictions, while those who request more restrictions generally ask for the Rule to be strengthened. The reasons given for revising the Rule generally echo the reasons for not implementing the Rule mentioned in previous paragraphs. There are respondents who believe the Rule should be revised because the process leading to its development was inadequate. Other respondents who request the Rule be strengthened generally

ask that the exemptions be removed from the existing Rule, such as public health and safety and go on to request that the Rule should have more restrictions, such as prohibitions on motorized recreation and hard rock mining.”

**Defense of the Roadless Area Conservation Rule** – Respondents request that the Forest Service, the Department of Agriculture, and the executive branch defend the Roadless Area Conservation Rule. They assert that the new Administration the Rule’s legality and request and request that all three levels of government mount a defense against the lawsuits challenging the Rule.

Several individuals specifically request that the Rule not be defended in court. One respondent, r, asserts that the Administration should not spend taxpayer money defending against laws suits that they see as legitimate and view any defense as restricting and giving in to only one segment of the population.

**Other General Comments** – Some individuals state that the Roadless Area Conservation Rule is difficult to interpret and needs clarity. Others say the Forest Service should abide by decisions already made, and emphasize work on other priorities such as compliance with NEPA, the threat of unnatural wildfire, and the spread of noxious weeds. Some respondents comment that a rule should not be developed which will affect eastern and western states differently, while another individual suggests separating the Rule into two distinct policies, for administrative purposes, local prescriptions and cumulative effects.

### *Need for the Roadless Area Conservation Rule General*

#### **5. Public Concern: The Forest Service should clarify the need for the Roadless Area Conservation Rule.**

##### **BECAUSE THE RULE DOES NOT ADDRESS THE STATED PURPOSE AND NEED**

We note that in the DEIS (3-6) there is a reference that the regions with the highest population densities have the least amount of inventoried roadless areas and that the highest demand for the unroaded benefits are in these areas. However, we also note that the areas with the most inventoried roadless areas (Alaska and Idaho) are in fact farthest from the population centers (DEIS 3-3). Given [where] the demands for roadless lands are located, it appears that the proposed action with its emphasis on unroaded areas in low population density areas does not address the stated purpose and need. (Elected Official, Douglas County, OR - #A11811.10000)

First, we feel the ANPR fails the test of Executive Order 12866 requiring agencies to identify a need for new regulations. The Forest Service has stated that the three reasons for the proposed rule are: (1) road construction can alter the fundamental characteristic of roadless areas; (2) budget constraints limit the number of roads that can be adequately maintained; and (3) the controversy over management of roadless areas causes costs and delays. However, the Forest Service did not identify a market failure or other compelling public need for the proposed rule. None of the three stated reasons indicate a need for a nationwide ban on road construction within Forest Service managed lands. In fact, a review of our company’s cooperation and partnership with the Forest Service demonstrates that all three of the above concerns can be successfully addressed and mitigated through a local control and planning process. (Business or Association, Pocatello, ID - #A20842.10000)

##### **BECAUSE ONLY A SMALL PERCENTAGE OF ROADLESS AREAS IS PROJECTED TO BE DEVELOPED BETWEEN 2000 AND 2004**

I agree with Secretary Veneman’s 5 principles.

Other Resource potentials really are not realistic for the Tongass if roads can't be built - logging, at least, would be nearly impossible. Current Forest plans assign about 41 percent of total I.R.A. to roadless management. This is enough. Only about 16 percent of the total I.R.A. is productive timberland that might have roads built for timber harvest, according to your figures. And if the Forest Service Roadless Area Conservation Final Environmental Impact Statement (USDA Forest Service, November 2000, pages 2-25) estimated that less than two-tenths of one percent of the total of inventoried roadless areas (94,600 acres of 58.5 million acres) might be developed between 2000 and 2004, then what is the need for the Roadless Rule? (Individual, No Address - #A1133.10110)

**6. Public Concern: The Forest Service should explain how current management does not provide the protection which it is the purpose and need of the Roadless Area Conservation Rule to provide.**

The roadless proposal implies that the current management does not "protect" these areas however none of the materials to date have examined the site specific management currently in place for these areas. We suggest that any analysis include a review of the management currently in place and describe how these strategies do not provide the perceived protection that is the purpose or need for the proposed action. (County Attorney, Grant County, OR - #A17667.30100)

*Implement the Roadless Area Conservation Rule*

**7. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule as it now stands.**

I am writing to support the Forest Service's Roadless Area Conservation Rule as it now stands. This policy was developed after extensive public hearings and legislative consideration over time.

We need to keep a BALANCED approach to forest conservation to save our remaining 30% of America's wild national forests from logging, mining, and drilling—activities already allowed on most national forest lands. The current rule adequately addresses the issues of fire management, forest health, access, and local input. (Individual, Fort Lauderdale, FL - #A20.10110)

I can attest that America is what it is today because of its beautiful woodlands that house creatures great and small and a variety of plants/trees. We must do everything we can to protect the woods. Clinton's wild forest protection act was not a hasty decision. Instead, it was born out of many years of research and discussions with average citizens and scientists in the field. It is what Americans want. So please let Clinton's roadless area plan stand as is with no modifications that would only destroy it. (Individual, Columbia, MO - #A24.10110)

On May 4, USDA Secretary Veneman announced that the Forest Service "will implement the Roadless Area Conservation Rule" and that the administration "is committed to providing roadless protection for our national forests." If the administration is sincere in its support of the protection provided by the Roadless Rule, it will respect the clearly expressed wishes of the public and decide not to tamper with the rule. (Organization, Washington, DC - #A20424.10150)

I am writing to you to urge you to preserve the Forest Service's Roadless Area Conservation Rule as it now stands (including in it the recently protected Tongass National Forest). This policy is the product of the most extensive federal rulemaking in history, with more than 600 public hearings and 1.6 million public comments, 95% of which support the strongest protection. (Individual, Brooklyn, NY - #A172.10111)

I still strongly support the protection of wilderness areas covered under the Roadless Area Conservation Rule since they provide, among other things, clean drinking water; protect water quality for drinking, fishing, and swimming; function as biological strongholds for rare wildlife; provide large, relatively

undisturbed landscapes important for protecting the web of life; serve as barriers against the spread of weeds and pests into pristine areas; offer opportunities for scientific study and research; provide open space and unspoiled vistas; and preserve areas needed for traditional Native American religious and cultural observances. (Individual, Roanoke, TX - #A4626.10150)

Not to flagellate a dead equine, but this process, in and of itself, is the most pressing concern to me. Like a recalcitrant child, the Forest Service continues to ask the same questions, hoping to get a different response. Well, it's not going to happen. The overwhelming majority of Americans want to protect roadless areas. The overwhelming majority of people who commented on the roadless rule (be they from NYC or Montana) supported the Rule as it is written. I will be one of literally tens of thousands of people who write this simple message to you. The Forest Service should support and implement the Roadless Rule just as it is. (Individual, Lewiston, ID - #A29569.10150)

**BECAUSE ONLY A NATIONAL RULE CAN GUARANTEE PROTECTION OF NATIONAL FORESTS THROUGH CHANGING POLITICS AND PERSONNEL**

We SUPPORT THE ROADLESS CONSERVATION POLICY—JUST AS IT IS . . . Only national protection will guarantee that Idaho's wild national forest lands remain intact regardless of changing politics and personnel. (Individual, Clayton, ID - #A5310.10150)

I support the roadless Area Conservation Rule as it is. National protection is best for these lands. During 18 seasons of work in Wilderness (Absaroka-Beartooth) and on Lookouts, I've seen how a change in personnel and politics can change land-use. If we're serious about keeping roadless areas intact (and I think we should be) national protection is the best way to do it. (Individual, Billings, MT - #A8697.10150)

Because the National Forests are a national resource, only national protection of the roadless areas will guarantee that wild national forest lands, in those states where they exist, (such as Wyoming, where I grew up, or Montana, where I have hiked and hunted in wilderness areas) will remain intact regardless of changing local and national politics and personnel. (Individual, Somerville, MA - #A9107.10111)

I am writing to you today to express my strong support of the roadless Area Conservation Policy, and to urge the U.S. Forest Service to implement the policy as it is currently written. Only national, coherent protection will guarantee that our wild, roadless national forest lands remain intact for generations to come—regardless of shifting politics and changing agency staff. Our partly owned roadless lands are part of an invaluable, irreplaceable national treasure; it is incumbent upon us to ensure this treasure can be cherished by our children and their children. (Individual, Portland, OR - #A19217.10111)

**BECAUSE IT PROVIDES CONSISTENT STANDARDS**

A national policy is needed to establish a set of standards to protect all National Forest roadless areas. Please implement the Roadless Conservation Rule that was set to go into effect in March. (Individual, No Address - #A3061.10150)

Question 1: Generically speaking, forest planning as mandated by NFMA is the appropriate arena for making determinations concerning Roadless Area management. However, there must be regulations that aid Forest Supervisors and the plan revision team that provide a consistent procedural approach to Roadless Area management. (Individual, Quarryville, PA - #A15217.13130)

SDSAF urges the Bush administration to develop a new rule that:

- establishes national standards to guide roadless area conservation
  - requires Forest Service line officers to apply those standards through the forest planning process.
- (Professional Society, Rapid City, SD - #A21751.13130)

**BECAUSE THE FIVE PRINCIPLES OF ROADLESS CONSERVATION HAVE ALREADY BEEN FOLLOWED**

Simply I believe that the five principles of roadless conservation that you ask the public to follow in this case, informed decisionmaking, collaboration, forest protection, private property protection and ensuring legal access, have already been closely followed. (Individual, Clayton, GA - #A15320.10111)

**BECAUSE IT IS BASED ON THE BEST AVAILABLE SCIENCE**

Other concerns. My main other concern, which I related in part in previous comments, is that your decision be based on the majority of public comments and on the best available science, not by politics, especially what I fear will be the influence of special interests on the environmental policies of the current administration. In the previous planning process, 95% of respondents were in favor of protecting the remaining roadless areas. While I appreciate the importance of forest products, I also appreciate the importance of the values that are unique to our remaining roadless habitats and that should be protected. Scientifically, it has been well established that roads are major causes of noxious weed invasions, degradation of fisheries and spawning beds, disruption of hydrologic cycles, spread of exotic diseases and pests that threaten forests (e.g. Chestnut blight, sudden oak death syndrome), erosion, and fire. Many important animal species avoid roads (wolves, grizzly bears, black bears, wolverines, fishers, martens, lynx, bobcats), while many native plant species are displaced by weeds that are only able to enter systems because roads acted as corridors for their invasion. The scientific basis of maintaining roadless habitats is well established and supported by overwhelming evidence that has been compiled by some of the world's best scientists. I know this very well because my Master's research explored the ecological effects of roads (including a current paper just submitted to Conservation Biology, authored by myself and a USGS scientist), and my current Ph.D. research concerns ecological effects of roads on exotic plant invasions, including a paper that I am about to submit to Ecological Applications. (Individual, Davis, CA - #A30523.10150)

**BECAUSE ONCE THESE PLACES ARE GONE THEY'RE GONE FOREVER**

The term roadless values is relative. To loggers and developers, it means money. To those of us who enjoy the outdoors for recreation, sometimes it can mean sanity. Let the rule stand as written. Again I say this—and cannot say it strongly enough—WHEN THESE FORESTS ARE GONE THEY ARE GONE FOREVER! Surely 95% of the people who took the time to give input can't ALL be wrong. Let's give the American public its due and listen. I hope these comments will not be met with the silence I love hearing in the forests. They are there for us—let's be there for them. (Individual, Rex, GA - #A576.10150)

Roadless areas may be the most important use of the National Forest, which is dedicated as a land of many uses. Roadless areas encourage biodiversity, offer unique recreational opportunities and protect wilderness for future generations. A shockingly small percentage of land in the United States is in designated roadless area. We must protect these remaining areas because once they are violated they cannot be replaced. Wilderness is not a renewable resource. (Individual, Afton, WY - #A10526.10150)

**BECAUSE IT IS LONG OVERDUE**

For many years, I have participated in the forest service planning process before government committees, the Bolle Commission, on primitive areas, on Wilderness areas, RARE I, RARE II, and the Tongass Land Use Management Plan 1975 through 2000. I can say after 47 years of documented involvement in the forest service planning process, that the Roadless Rule was long overdue. When Congress passed the Organic Act in 1897, and President Theodore Roosevelt added 140 million acres to the national forest system in 1907, it was to protect the remaining public forests from the timber barons and the railroads. There has been over 100 years of public testimony on the Roadless Rule, attempting to protect the watersheds of our nation.

The Forest Service, which after WWII should have changed its name to the Road Service for the timber Industry. That is clearly evident in the Tongass National Forest in Alaska on Prince of Wales Island. This 1.5 million acre island owned by the public and administered by the USFS in Alaska has almost as many miles of road as the entire State of Alaska (365 million acres+) and 190 miles of road on Prince of Wales Island (1.5 million acres).

If it had not been for President Theodore Roosevelt in 1909 adding more than 140 million acres to the national forest system, we would have nothing left for the Roadless Rule. This has not been a rushed process. The Roadless Rule is documented in public administration for having the largest public hearing in USFS history and coming up with a ruling in 18 months. If only the congress could do so well. (Individual, Juneau, AK - #A2317.10111)

#### **TO AVOID REPEATING MISTAKES OF THE PAST**

It is of paramount importance that we understand when our roadless areas and wilderness are gone, they WILL BE GONE.

If you doubt my words, look at countries [which] have done just that. Surely we can learn from their mistakes, before it is too late for us and our lands.

I ask that you honor my and the 1.5 million of American people's request to leave all the million acres of roadless areas BE. (Individual, Grass Range, MT - #A18058.10111)

I have heard of the Cedars of Lebanon, but today they exist only on the Lebanese flag. The Landes area of France is nothing but sand dunes now because of over cutting of a huge forest area in order to construct sailing ships. Please, let us not make similar mistakes. (Individual, APO, CA - #A12817.10111)

The Maine woods is just beginning to recover after being logged and burned in the mid 19th century, the pine forests of the Great Lakes states have still not recovered from similar treatment 100 years ago. The western fir and pine forests are riddled with logging roads and clear-cuts, except for a few islands of late successional forest and roadless areas. Last year, I, and a million people like me, supported the cessation of logging, roading, and mineral leasing in roadless areas of the national forests. We did so to preclude repeating the same mistakes that our culture did as it moved west. Now we are being asked to reconsider. (Individual, Corvallis, OR - #A7998.10111)

I have lived in Alaska since 1972. I have a Masters degree in resource economics. Economics is the study of scarce resources. Our forest resources belong to us all, subsistence hunters and urban dwellers alike, fishermen and tourists and residents. Except for one industry, the timber industry, which has already cut down 70% of the best Tongass habitat, the rest of us depend on intact habitat and plenty of it for fishing, hunting, berry and mushroom gathering, and just camping with the kids. Must we repeat all the mistakes of the lower 48? (Individual, Juneau, AK - #A23012.10111)

#### **BECAUSE IT REPRESENTS A BALANCED APPROACH TO FOREST CONSERVATION**

The January ruling, as published, provides for the remaining 31% of our forests to be protected as roadless lands. As the January roadless conservation rule sets forth, a grand compromise balances roadless conservation versus development. Setting aside only 31% of our forests is, in the face of all the forests that have been cut, drilled and mined to date, less than optimal. However, it is a worthy compromise and it needs your unwavering support. (Individual, Oswego, IL - #A12043.10111)

I recently receive a copy of the "Forest Service's Roadless Area Conservation Rule" to review. I have completed my review and I am writing this letter in support of the Rule.

The Rule represents a balanced approach to forest conservation and protecting important roadless areas from damage caused by activities already allowed on most National Forest Lands. The Rule in its present form adequately addresses the issues of fire management, forest health, access, and local input. Because I am an elected official, the opportunity for local input is always a plus for me. I am opposed to weakening National Forest protection in favor of logging and development in roadless areas on a forest-by-forest basis. This type of practice has led to a steady decline of these precious lands.

The comprehensive and inclusive public process outlined in the Rule should reassure decision makers of the public support for the Roadless Areas Rule. The forestlands provide numerous amenities, which are enjoyed by all Americans. The Rule will allow logging to continue on most Forest Lands while

protecting 31% of these lands for other values. This balance is very important to me and is the primary basis for my support of the Rule.

Therefore, I encourage the implementation of the "Roadless Area Conservation Rule as promulgated." (Individual, Little Rock, AR - #A19226.10111)

The last wild roadless areas of our National Forests are critical for priceless ecological services such as clean water sources, and habitat for diverse fish, wildlife and plant species. They also provide unique recreational opportunities for those who like to hike, hunt, camp and fish. Over half of our national forests are already open to logging, mining, roadbuilding, and other development. The 58.5 million acres protected by the Roadless Rule should remain protected from logging and other destructive activities not only for the benefit of all Americans today, but also for future generations. (Individual, Charlottesville, VA - #A5097.10111)

Presently, 51 percent of the national forests remain open for logging, mining, and other resource activities, while only 18 percent have been designated as wilderness areas. The rule, without modifications, will ensure that the last 31 percent remains unspoiled and protected from logging, mining and road-building. I support the Roadless Area Conservation Rule, without modification, because it achieves a true balance between the recreational and extractive uses for our national forest lands. I am concerned that changes to the rule will significantly weaken protections for these special places. I urge you to let the rule stand as it is written in the January Record of Decision. (Individual, Concord, NH - #A19701.10150)

Much to the dismay of the public, National Forest Service lands are already heavily roaded and frequently harvested for timber. **PRECISELY BECAUSE IT IS NECESSARY TO BALANCE THE ECONOMIC INTERESTS OF TIMBER COMPANIES WITH THE MORAL, AESTHETIC AND RECREATIONAL INTERESTS OF THE PUBLIC, THE FOREST SERVICE SHOULD MAINTAIN THE ROADLESS RULE AS IT PRESENTLY EXISTS.** (Individual, No Address - #A5948.10000)

#### **BECAUSE IT STILL LEAVES AMPLE AREA FOR OTHER USES**

Protecting less than one-third of the national forests from logging and road building for recreational use and resource conservation should leave more than enough areas remaining for special interest logging and other commercial uses. (Individual, Tucker, GA - #A4543.10111)

As a frequent recreational user in our National Forests, I would like you to know that I am very concerned about the current proposed changes to this rule that was previously commented on by 1.6 million Americans, myself included. I have been hiking and camping in nearly two dozen of our National Forests and found roadless areas to be in need of the protections that this rule will (in its current form) enable. Furthermore, there are ample areas of the USFS system open to commercial exploitation. Personally, I would prefer that my grandchildren be able to experience the wild Monogahela, Kaibab or Tongass as they have always been than to say someone made money by culling these forests in the past. (Individual, Rockville, MD - #A4974.10111)

#### **BECAUSE IT ADEQUATELY PROTECTS OTHER INTERESTS**

We do not need more timber roads in the forest just to log one quarter of one percent of the national timber supply. The rule as it stands exempts all acres currently under lease for logging. Furthermore, it preserves existing access for motorized recreation, mountain biking, hunting and fishing. It also permits construction of new roads for fire suppression and for stakeholders with existing statutory rights. It also allows for the cutting and removal of trees for fire prevention. (Individual, No Address - #A3605.10150)

I am writing to express the support of the California Department of Forestry and Fire Protection (CDF) for the Forest Service Roadless Area Rule (Rule) as adopted on January 12, 2001. The protection of wildlands and roadless areas provided by the Rule is important to many Californians. In its existing

form, the Rule poses no major impediments to CDF in its collaborative work with the US Forest Service to protect the citizens and natural resources of the state. CDF appreciates the degree to which the final Rule was responsive to the issues raised both by CDF in its scoping letter of December 21, 1999, and by The Resources Agency of California in its letter of July 28, 2000, resending to the Draft Environmental Impact Statement. (State Agency, Sacramento, CA - #A18110.10150)

#### **BECAUSE SO MUCH FOREST LAND HAS ALREADY BEEN ACTIVELY MANAGED**

Please enact the roadless rule! Too much of our forest land is logged, developed, and industrialized. The forests are shrinking every day, and this is one of the most important steps to take to ensure the future of woodlands. One day, even if not in our lifetime, someone will ask Why did they destroy the most important habitat on Earth? What was the reason? Was it money? Was it pressure from logging and mining companies? Was it pressure from PROGRESS?? (Individual, No Address - #A4590.10110)

Enough of America's forests and wild lands have already been ruined as a result of poor planning and misuse by unconcerned industry interests. There are no good reasons for altering the Conservation Rule, as it contains provisions for fire management, forest health, access, and local input. (Individual, Davis, CA - #A170.10111)

I care about conservation and am deeply concerned about the possibility of losing valuable wild land to roads and the uses that would engender. There are so few truly wilderness areas left. What about the people who want a true wilderness experience? Soon the world, and worse, the United States will have no areas left to provide that if we further encroach on what we have left. Please don't rescind the 'roadless' rule, but let it stand. (Individual, Hopkins, MN - #A217.10111)

Under current forest plans, about 60 percent of the remaining roadless areas are available for road construction and logging. The Roadless Area Conservation Rule is needed to prevent further incremental loss of roadless areas. The appropriate role for forest planning is to provide additional protection of roadless areas, such as preventing off-road vehicle damage, and identifying roadless areas omitted from Forest Service inventories. (Individual, No Address - #A4758.10110)

#### **BECAUSE WILDERNESS AREAS ARE TOO HIGH IN ELEVATION AND TOO FAR SEPARATED FROM EACH OTHER TO ADEQUATELY PRESERVE BIODIVERSITY AND WILDERNESS RECREATION**

Years before the process that led to the Roadless Area Rule began I had, through research and personal experience, come to the conclusion that protecting roadless areas was absolutely essential for the long-term health of the forest and its indigenous wildlife. While one third of the White River—750,000 acres—is designated Wilderness, these areas fail to protect biodiversity or provide adequate opportunities for wilderness recreation for two fundamental reasons: they are too high in elevation and too far separated from each other and from centers of human population. The Roadless Rule, as it stands, would correct these critical deficiencies in the management of the White River National Forest and provide more benefits than costs to our local communities and economy. (Organization, Carbondale, CO - #A17314.10111)

#### **BECAUSE ROADLESS AREAS SERVE A DIFFERENT PURPOSE THAN WILDERNESS AREAS**

The National Forests belong to all Americans and this decision should not be placed in the hands of local officials. Roadless areas and Wilderness areas are different, and both deserve protection. Roads are gateways to logging and ORV use, and the large body of literature on edge effects and habitat fragmentation should make this decision easy—Please keep the Roadless Rule intact. (Individual, Boulder, CO - #A20981.13110)

#### **BECAUSE THE ORIGINAL PROCESS WAS SUFFICIENTLY LOCAL**

In an increasingly "small" world, local is a term that has a changing meaning. In terms of national public lands, such as the National Forest System, all planning is inherently local. Since National Forests are "owned" equally by the citizens of the United States in a collective manner, it shouldn't matter whether a person lives in Florida or Nevada when it comes to management decisions on a National Forest in any given location. In that regard, I believe that **the original national process used in 1999 and 2000 to**

**develop the Roadless Rule was appropriate and sufficiently “local”.** (Individual, La Pine, OR - #A22107.10151)

#### **BECAUSE IT REPRESENTS THE WILL OF THE PEOPLE**

I read the newspapers and magazines. I use the Internet for research. I listen to the broadcast news. So please don't continue to insult my intelligence by maintaining that somehow the “public” has not had adequate input to the roadless area policy currently hanging fire in this administration. That's just nonsense. Feeding to the uninformed as a way of circumventing the expressed will of the people is almost criminal. Roadless policy has been studied and commented upon more thoroughly than any other forest policy in this nation's history. Good grief. (Individual, Spokane, WA - #A1057.12200)

The Sitka Conservation Society has consistently worked to protect America's last remaining Roadless Areas and inclusion of the Tongass National Forest in the Roadless Area Conservation Rule. We strongly oppose timber sales in any of the Inventoried Roadless Areas (IRAs) on the Tongas. Apparently, the American public agrees with us. In no fewer than eighteen separate opinion polls (conducted by both Republican and Democratic pollsters), the American public has shown strong support for national forest conservation. It is estimated that 76% of Americans (62% Republicans) support the Roadless Rule and inclusion of the Tongass N. F. (Organization, Sitka, AK - #A12003.10150)

In the case of the RACR, it is now mandatory that the Forest Service implement this rule to try to build a positive relationship with this national public. Subverting this national public desire will eventually lead to the demise of the Forest Service—the public wrath will not be denied. You are embarked on a course of consciously subverting a clear public mandate for the protection of roadless areas.

Many rural and local people support the roadless rule as part of the broad national mandate. The Forest Service must find ways to deal with the rhetoric of the few who would subvert not only the national will, but also what is best ecologically for the land. The vitriol of the minority against the RACR can be mitigated if the Forest Service simply worked with this constituency within the framework of the RACR—and you have lots of flexibility to do so. Environmental groups complained strongly during the development of the RACR that too much flexibility was embodied in the rule. This flexibility over time would allow the Forest Service to work with these local minorities in a positive way. Instead, your approach is to deny the clear and broad mandate and move to disenfranchise the people who own these forests and pay the bills. Hardly wise. (Individual, Corvallis, OR - #A13493.10150)

The forest service must serve the broad public interest by fully protecting the environmental, wildlife and aesthetic values overwhelmingly supported by the public and by firmly opposing economic exploration values which are completely incompatible with the maintenance of roadless area characteristics. The Forest Service should be respectful to those seeking to undermine roadless area values but must enforce the rules and the law, even if unpopular with a tiny minority of citizens and corporate interests who selfishly promote personal, temporary, economic gain overall other values. Those who promote commercial exploitation demands must be respectfully reminded that the vast majority of forest service lands are already managed for economic values and that a small percentage of the public lands in the Unites States of America must be managed for primarily ecological and aesthetic values. In a democratic society worthy of the name, the will of the majority must prevail, particularly when it is the result of an exhaustive, legally scrupulous process for seeking such public will. American citizens overwhelmingly want complete protection of our roadless areas as wilderness. (Individual, Port Angeles, WA - #A6179.15165)

The process for the ANPR has been less than honorable. The ANPR states in part that “there was inadequate opportunity for public review and comment on the roadless rule”. This is the opposite of the truth. Over a three-year period, over 1,600,000 Americans gave their opinion on the RACR. About 1,500,000 of them supported increased roadless protection. The scale of the public hearings was unprecedented. Yet, in response to these false allegations of inadequate opportunity for public comment, the ANPR allows only a poorly publicized 60-day comment period, in which comments on 10 questions

(8 of which are clearly biased towards the extractive industries that would benefit from alterations to the RACR) are given more weight than simple comments about roadless policy in general. The public has spoken, and the administration has an ethical and legal obligation to abide by the RACR. (Individual, Boulder, CO - #A14055.10152)

The Forest Service conducted an unusually extensive public participation process in California to solicit public input. The agency held 63 public meetings throughout the state. Support for the roadless area rule was and remains widespread and strong in California. Public opinion polling conducted in the state indicated that support was approximately 3 to 1 statewide. Approximately 140,000 public comments were submitted on the draft proposal from California; the overwhelming majority was in support. (State Agency, Sacramento, CA - #A18110.15110)

#### **BECAUSE ROADLESS AREAS IN EASTERN FORESTS ARE SO SCARCE**

A key finding of the recent interagency Southern Appalachian Assessment (SAA) was that only 4% of the 37 million acre multi-state region is in a roadless condition. Most of this acreage is on the National Forests. Roadless areas are the last vestiges of wilderness in the East. They are rare and precious, small and disparate. And destined to become smaller and even more degraded if present Forest Service policy and practices are not stopped. As an example of how bad the situation is, when the 600,000 acre Daniel Boone NF was recently “inventoried”, only a single tiny stand-alone roadless area (of around 1800 acres) was found on the entire Forest. Less than a half of 1% of the 1.1 million acres of NFs in Mississippi are inventoried as roadless by the FS. According to the May 2000 DEIS (pg. B-10), only 7% of the acreage in all the Southern Region NFs are designated as roadless areas. The entire Eastern United States (Forest Service Regions 8 and 9) contains less than 4% (1,543,000 acres) of the inventoried roadless lands outside of Alaska (see DEIS page 3-98). (Individual, Staunton, VA - #A29325.10111)

#### **BECAUSE IT PRESERVES THE STATUS QUO**

This rule preserves the status quo of actual uses in our National Forests by limiting development of areas that have never been developed, while not impeding already approved activities. The result of the public process is precedent-setting because it is typically the opposition to a proposed action that garners the greatest level of support and comment. In this case, it was supported for the status quo that received the overwhelming support of Americans. (Individual, Evergreen, CO - #A28071.10153)

### **8. Public Concern: The Forest Service should recognize that the Court’s concerns do not justify a departure from the Roadless Area Conservation Rule.**

What are the Court’s and the plaintiff’s concerns that the Service has pledged to address? In its May 4 report to the Court, the Service has said that it shares the Court’s concerns about the process through which the Rule was promulgated, and that it wants to “ensure that Americans who live near these inventoried roadless areas have sufficient and meaningful opportunity to comment upon the Rule’s development and implementation.” As we understand them, these statements signal three things: 1. The Service intends to address the specific NEPA irregularities found by the Court. 2. The Service intends to provide for substantial public participation in the current review and in considering any subsequently proposed modifications to the Rule. 3. The Service intends to ensure that citizens who live near roadless areas have a voice in decision making under the Rule.

While we by no means wish to convey that the FRWG agrees with the Court’s analysis or the plaintiff’s concerns, it should be emphasized that none of these concerns even comes close to undermining, or justifying a departure from the Rule’s basic construct: management by considering site-specific exceptions from a national standard. On the contrary, these concerns clearly are capable of being addressed within that construct, through this rulemaking and perhaps through supplemental NEPA documentation . . . . (Organization, Washington, DC - #A23283.15150)

## 9. Public Concern: The Forest Service should consider that revisiting the Roadless Area Conservation Rule will have negative effects.

### IT IS A WASTE OF TAXPAYER MONEY

I understand that more comments were received on this regulation than ever in Forest Service history, and the great majority favored the Roadless Area Conservation Rule. It is reasonable to assume that many millions more agree with the million or so people who took the trouble to write. I cannot fathom therefore why this public comment period has been reopened except to fish for a different answer, one more to the liking of the narrow interests opposing this rule. I object to taxpayer money being wasted on revisiting a good rule that went through a lengthy and competently run public process. (Individual, Juneau, AK - #A23012.10152)

I would like to express outrage at the waste of taxpayer money being perpetrated in the name of properly determining public sentiment. Roadless-Area legislation proposed under the last administration resulted from one of the most all-encompassing public-outreach exercises ever undertaken. To claim that abundant opportunities were not available for public comment is to criminally misrepresent the efforts of those who came before you to this question. The American public spoke clearly and forcefully. Their present attempt to find some justification for ignoring those voices is undemocratic and unworthy of the American people or the resources for which they are quite obviously concerned. (Individual, Bloomington, IN - #A30275.10153)

It is baffling to people who are not career politicians as to how the government can spend the money on RARE I and RARE II, spend the money and the manpower over the years developing a policy and soliciting public comment, and then throw away the investment due to nothing more than a change of administration. This waste of taxpayer money is appalling. DON'T WASTE THE TIME AND MONEY OF THE PAST; DON'T THROW IT AWAY. (Individual, Lake Tomahawk, WI - #A29653.75600)

### IT WILL WEAKEN PUBLIC TRUST IN THE FEDERAL GOVERNMENT

Any efforts to change this publicly mandated policy would significantly weaken the protections our wild forests deserve and would also weaken the public's trust in our federal government to do what is morally, ecologically and ethically right. (Individual, Morrisville, PA - #A4931.10111)

### IT WILL WEAKEN PUBLIC TRUST IN THE FOREST SERVICE PLANNING PROCESS

The existing Rule provides a reasonable approach to protecting roadless areas on our national forests, including adequate exceptions to address concerns referenced in the ANPR. It was adopted after extensive study and public involvement, including 600 local hearings and over 1.6 million citizen comments, 95% in favor of the Rule. Through these public meetings and public comments on the roadless area conservation rule, there has been ample demonstration of public support for maintaining roadless areas in an unroaded condition. Reliance on this public involvement is crucial for continued respect and confidence in the Forest Service process. (Individual, Asheville, NC - #A22623.10153)

The ANPR implies that local decision-making is needed because protection is warranted for some roadless areas but not others. It states that most roadless areas previously were not recommended for wilderness designation due to low wilderness values, inadequate public support, or "other resource potentials." It observes that the resource values of roadless areas "vary in importance," specifically pointing out that roadless areas contain 9 million acres of "productive timberland." These statements exhibit the anti-wilderness, pro-timber mentality that has eroded public trust in Forest Service planning and created broad support for national regulatory protection of roadless areas. (Organization, Bellingham, WA - #A22958.10161)

### IT WILL POLARIZE THE POLITICAL CLIMATE AND INCITE PEOPLE TO RADICAL ACTIONS

We all know why this roadless issue is being revisited and will ultimately be compromised to appease political interests. Let's at least have the decency to disclose the truth and the real consequences of building more roads, the uncertainty of the science behind this analysis should also be disclosed so that

decision makers realize they're going into this half blind, we don't have the ability to accurately predict the impacts and mitigation for anticipated impacts oftentimes fail. On the political end, you'll appease some greedy and/or misguided folks by building more roads but you'll anger untold masses of people and this will serve to further polarize the political climate and incite environmentalists toward radical avenues to achieve their goals. There is little choice when the proper channels have been followed that culminates in an executive order and then it's torn apart by special interests. (Individual, No Address - #A137.12210)

## **10. Public Concern: The Forest Service should recognize that many groups support the Roadless Area Conservation Rule.**

### **SOME WESTERN GOVERNORS**

The administration states that "western governors" are opposed to this ruling. That is a gross stretch of the truth. My governor, Gary Locke of Washington State, is a STRONG supporter of the ruling, as is Governor Kitzhaber of OR and Governor Davis of California. Our states collectively have more roadless areas than any of the "western governors" states that are now whining about public process. (Individual, Seattle, WA - #A84.15130)

### **LOCAL RESIDENTS**

The Bush administration's claim of lack of local input is disingenuous at best. Local communities were heavily involved in the planning process for the Roadless Rule. Nearly three years in the making, the Roadless Area Conservation Rule was the most extensive Federal rule-making process in history. Over 600 public meetings were held nationwide, the majority of which were held on or in the vicinity of the national forests affected by the rule. In Alaska, roughly 7,500 people commented on the Roadless Rule and 6,200 of those comments favored the rule and inclusion of the Tongass and Chugach National Forests. In Sitka, 69 people spoke at the public hearing held by the Forest Service, and 63 spoke in favor of the policy, I'm not sure how much more local than that you can get—Sitka is surrounded by the Tongass N.F. (Organization, Sitka, AK - #A12003.10153)

The Conservation Rule was adopted after much public deliberation and the receipt of more comments (reports are an estimated 1.6 million) than have been received on any other issue. There could hardly have been more informed decisionmaking. You ask about what local participation should be involved, but there were 430 public meetings, including at least two meetings for every national forest. We understand that over 23,000 people participated in those meetings. This was a fair, open and very extensive process. Thus, input from local interests has already taken place. The Forest Service has already gone to a great deal of time and expense to solicit views from the public and from those near each national forest for input into the Conservation Rule. That rule is further supported by an environmental impact statement. (Organization, Birmingham, AL - #A21582.10153)

IT IS IMPORTANT TO NOTE THAT, CONTRARY TO CHIEF BOSWORTH'S ASSERTIONS, MANY RURAL RESIDENTS APPLAUD THE ROADLESS RULE. The majority of those who attended the meetings at the National Forest level during scoping and the development of the draft Environmental Impact Statement endorsed the RACR. In fact, many local residents called for even stronger protections than the final rule afforded roadless areas because they were concerned about quality of life issues and their local economies . . . . It is misleading for the Administration to portray the roadless rule as a federal land grab that local communities oppose. As evidenced by the testimony given at the 600 National Forest hearings, that is simply not the case. The record is clear: the majority of Americans, rural and urban, want their wild, public forests conserved. (Organization, Nevada City, CA - #A4941.10152)

The current Forest Service's Roadless Area Conservation Rule should stand as it is currently written. Last summer, I attended the public hearing in Bellingham, Washington regarding the proposed roadless policy. The public support for the roadless policy at that meeting in a western timber county was overwhelmingly in favor. Nearly all those who spoke . . . at the hearing were local Whatcom County

citizens. The few people I saw who spoke against the roadless policy were all from outside the area. (Elected Official, Whatcom County, WA - #A4955.10153)

#### **AVERAGE CITIZENS**

There are several areas where this [snowmobiles and ATVs] type of recreation can be done yet we have a militia-oriented radio host here telling people to break down the gates to trails that they illegally put in to begin with. These people threaten, spread anti-governmental conspiracy theories, give assassination lists on the air, threaten and commit property damage to those who speak out about their racism (I know this first hand as I have become a target of theirs along with my children after they called a Jewish Holocaust survivor a cheap whore on the air and then went into the Jewish banker world take over garbage) yet they are the only ones complaining about the Roadless issue. Normal, honest, non-militia citizens love it. (Individual, Kalispell, MT - #A26418.15123)

I just wanted you to know that some of the supporters of this popular government effort come from “middle-of-the-road” backgrounds. I live in southern California and own the brunt of my real estate in southern Oregon-Josephine County. I am neither hippy nor logger and was a republican activist until the advent of king George Bush . . . Currently, I am employed by Albertson’s grocery chain. (Individual, No Address - #A899.15111)

#### **TRIBES**

Your quote includes states, tribes, and other stakeholders in addition to local communities. That’s all well and fine, but didn’t states, tribes and other stakeholders already comment? What tribes are you soliciting comments from? The ones who have joined a lawsuit against the Forest Service? I currently live on the Nez Perce Reservation. The Nez Perce and their ancestors have lived in central Idaho for thousands of years. You can’t get more “local” than that. The Nez Perce Tribe fully supports the Roadless Rule. Didn’t you get their first letter? The Tribe has written a second letter, once again supporting the Rule. If you are truly looking for “local” input, I would suggest you read their letter. (Individual, Lewiston, ID - #A29569.10152)

## *Do Not Implement the Roadless Area Conservation Rule*

### **11. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.**

I, myself do not see any real purpose to the roadless areas except to keep the public away from public land. Is there something going on here that I don’t know about? I can peacefully co-exist with livestock and many western ranchers can’t survive without the grazing permits that roadless areas put an end to. The large companies own thousands of acres of timberland, so, all that you are really hurting in the timber industry are the small companies that need public lands in order to stay in business. I don’t believe in so-called clear cutting and I think that any company cutting trees on public land should have to clear off old, dry brush that would cause disastrous forest fires. And, has anyone stopped to think that everything that we have come out of the ground in one way or another? It surely doesn’t seem that way to me. (Individual, No Address - #A8252.10112)

The roadless rule should be abolished totally and completely, never to be resurrected. Anything short of this is pure insanity, and totally un-American. It smacks of the Communist approach to people and resource control, and certainly doesn’t seem at all to represent the values of freedom that I grew up with. (Individual, Manti, UT - #A27830.10130)

#### **BECAUSE IT IS THE PRODUCT OF A BIASED PROCESS**

I am writing to oppose the Forest Service’s Roadless Area Conservation Rule as it now stands. This policy is the product of the most biased federal rulemaking in history, with most emphasizing eastern states absentee landlords who have no direct livelihood interest. (Individual, Spokane, WA - #A1711.10120)

I am very opposed to the Roadless designations being pursued by your agency throughout the United States. While I do favor reasonable and effective management of our national resources, including forests, this process extends way beyond what is reasonable. It is clear that environmental extremism is alive and well in our national service staff, and this is hugely disappointing to people who pay their taxes in support of government, and expect to have access to public lands when they visit. The extent of closures in forests and other public lands is just not acceptable.

I have always held a favorable view of the Forest Service, until recently. The Roadless Initiative has changed my view. Please share my message with other staff within your unit who are involved in Forest Planning and Land Use decisions. (Individual, Yucaipa, CA - #A12.10130)

I am writing to support revisiting the Forest Service's Roadless Area Conservation Rule as it now stands.

The rule represents a one sided approach to forest conservation, and in essence locks up the forests. What happened to the multiple use concept that allows responsible logging, mining, and drilling. (Individual, Salina, UT - #A1119.10130)

I am writing to ask you to repeal the Forest Service's Roadless Area Rule as it now stands. This policy is the product of the most one-sided opinion of federal rulemaking in history.

The rule represents a one-sided approach to forest conservation. Each specific area needs to be examined and ALL parties concerned must be informed and given their fair chance to voice their opinions.

The best thing to do is to trash the roadless plan as it is written and draft a new plan for the National Forests that includes access for the public recreation and responsible extraction of our valuable resources that these forests provide. (Individual, Phoenix, AZ - #A1699.10150)

#### **BECAUSE IT IS BASED ON EMOTION, NOT LOGIC**

I believe the proposed Roadless plan was based on emotional and unprovable science, by people who think with their hearts instead of using common sense logic. (Individual, No Address - #A1729.10130)

#### **BECAUSE BENEFITS OF THE RULE ARE INFLATED BASED ON SUBJECTIVE REASONING**

Benefits of the proposed rule are inflated based on subjective reasoning. There is scant evidence in the FEIS that the Forest Service has truly done any analysis that objectively considers the long-term impacts of this proposal. (Professional Society, Anchorage, AK - #A21707.20203)

#### **BECAUSE IT WAS DEVELOPED WITHOUT LOCAL INPUT AND DUE PROCESS**

I am strongly opposed to the Clinton Roadless Initiative Program. The program was implemented without local input and due process and in my opinion is in violation of the U.S. Constitution. I believe the U.S. Forest Service needs to consider the needs of all user groups when implementing policies that affect these users. (Individual, No Address - #A47.10130)

We believe there are significant policy and legal concerns with the January 2001 roadless regulations. It is essential that these decisions are made only after taking into account local conditions, local values and local input. The failure by the previous Administration to do this is precisely why the regulations are criticized for failing to provide an adequate opportunity for public comment (the over one million form e-mails and postcards generated by the Heritage Forest Campaign notwithstanding) and contributed heavily to the injunction issued by the U.S. District Court for the District of Idaho in *Kootenai Tribe of Idaho v. Veneman*, No. CV01-10-N-EJL, and *State of Idaho v. United States Forest Service*, No. CV01-11-N-EJL (D. Id. opinions filed April 5 and May 10, 2001). We urge the current Administration not to repeat the same mistake. (Association, Rockville, MD - #A13306.10130)

I think the entire roadless area designation process should be rethought out. Numerous public hearing should be held in all affected forest areas. Input from local people who depend on the use of forest service lands for economic survival should be consulted. These would include farmers, ranchers, loggers, miners, oil men.

This policy should not be implemented until the people of the west have a chance for input. (Individual, No Address - #A527.10133)

When the initial Roadless Area Conservation was announced in January, 2001, ARRA believed along with millions of other Americans, that the policy developed was a result of a top down approach dictated from Washington without the benefit of input from Americans living in close proximity to the forests managed by the U.S. Forest Service. Re-opening this rule for additional comment is an important step in remedying this serious oversight by the previous Administration. (Organization, Washington, DC - #A5069.10131)

I attended two public hearings on the proposed roadless rule last year. It was evident from responses to questions at the hearings that local and regional Forest Service personnel responsible for implementing the roadless rule were not fully certain of the content of the rule, not sure of the rule's implications for forest health and not confident of their ability to interpret the rule and then enforce it locally. The whole tone was of local administrators who had been blindsided by an initiative which their constituency had no part in shaping, but which they were now expected to defend and implement. (Professional Society, Eagle River, WI - #A19071.10132)

Alaskans are never heard on these issues because a bunch of people who have never been here, and do not understand how we live drown out our voices from the lower 48. It is not fair, and it is not right that people in Boston have more say about how we in Alaska live our lives than we Alaskans do. Nobody here cares how people in Boston live—why should outsiders have so much control over our lives? Imagine what would happen if Alaskans were able to shut down the third largest industry in the lower 48, as people from the lower 48 have done to us. There would be a revolution down there. (Individual, Anchorage, AK - #A15680.10131)

#### **BECAUSE IT IGNORES PROGRESS MADE AT THE LOCAL LEVEL**

The State of North Dakota has worked diligently with Forest Service personnel, oil and gas interests, ranchers and the environmental community during the planning process to address concerns regarding the Grasslands Management Plan. The Roadless rule trumps those efforts and ignores the progress being made at the local level. Implementation of the roadless rule will impede future cooperation among those groups. (Governor, State of North Dakota, - #A22065.15162)

#### **BECAUSE ROADLESS ISSUES WERE ADEQUATELY DEALT WITH IN RARE I AND RARE II**

We would hope that the Forest Service would by now have reasoned that the reason for so many lawsuits relating to the roadless review is because the agency clearly stepped out of bounds when considering the roadless review. It would be in the best interest of the Federal Government to rethink its position on roadless areas. Those issues were dealt with in the first go round of wilderness known as RARE I and RARE II. (Elected Official, San Juan County, UT - #A4890.10137)

Last summer, New Mexico's forests burned out of control, destroying millions of dollars of homes, private property and timber, not to mention the livestock and wildlife habitat, and the danger to watersheds as the late summer rains begin to fall. These fires burned so hot and fast because of years of fire suppression combined with restrictions on logging and grazing, creating a fuel load that was simply a disaster waiting to happen. It will take literally generations for these forests and watersheds to heal. The FS now is considering implementing an initiative across the US to limit timber harvest and road construction, making fire control even more difficult. The NMWGI strongly opposes the creation of roadless areas. (Organization, Albuquerque, NM - #A8813.10112)

#### **BECAUSE ROADLESS AREAS ARE ALREADY ADEQUATELY PROTECTED**

We do not need any more protection for, so called roadless areas. We have enough laws, already in place to keep all the off the road travel stopped. All the proposed wilderness study areas, have been inspected by congress and deemed not suitable for wilderness designation. What is it environmentalists don't understand about congress' decision. (Individual, Bishop, CA - #A4796.10112)

Areas not suitable for road construction are presently being adequately protected under policies now in existence without a national roadless policy. (Individual, Kalispell, MT - #A1071.10112)

I am writing because I do not support the Forest Service's Roadless Area Conservation Rule as it now stands. This policy is the product of the most extensive federal rulemaking in history, with more than 600 public hearing and 1.6 million public comments, and I believe the Forest Service has adequate means at its disposal to take proper care of all of its valuable resources without a need for more rules. (Individual, Grand Junction, CO - #A1696.10150)

The policies in effect prior to the Roadless Conservation Rule were completely adequate. (Individual, Albuquerque, NM - #A10497.10112)

I would support the no-action alternative. The Forest Service already has adequate administrative authority to control road development and Manage Lands. Page S-7 of the DEIS states. "Road construction and reconstruction would continue to be prohibited only where land management plan prescriptions prohibit such action". In Lander County a majority of unroaded portions of inventoried roadless areas already have vehicle access restrictions. The proposed rule is very similar to the no action alternative. The proposed rule is overly restrictive and limits local decisionmaking authority, particularly in communities like Austin, Kingston and Hadley that rely upon the development and use of the natural resources on the National Forest Lands. (Individual, Austin, NV - #A15794.10130)

#### **BECAUSE THERE SHOULD BE NO ROADLESS AREAS**

There should be no roadless areas therefore there is no need to develop a process to designate roadless areas. (Individual, Ogden, UT - #A494.10130)

#### **BECAUSE IT DOES NOT REPRESENT A BALANCED APPROACH TO FOREST CONSERVATION**

The rule represents an unbalanced approach to forest conservation. In federal forests where 87% of the land is already off limits to timber harvest, this wacko policy will set aside the last remaining forest land as wilderness—not to be managed for multiple uses. (Individual, Salem, OR - #A188.10130)

The rule does not represent a balanced approach to forest conservation. As written, it does not adequately address issues of fire management, forest health, access, and local input. (Individual, Pasadena, CA - #A979.10130)

I am writing NOT TO support the Forest Service's Roadless Area Conservation Rule as it now stands. This policy should be done away with.

The rule REPRESSES a balanced approach to forest conservation. (Individual, Knoxville, TN - #A456.10112)

As responsible users of the nation's public lands, we strongly urge that the Roadless Initiative (proposed by the previous presidential administration) be eliminated. It does not properly balance the needs of American citizens/taxpayers and environmental issues. We represent a significant number of groups and individuals who will be adversely affected by this measure, and we hope that the Forest Service President Bush, and Vice-President Cheney will act in the manner we suggest and expect. (Business, Corona, CA - #A747.10130)

As a native Montanan, I love the area I live in and appreciate the beauty of the natural world around us. My family and I respect the land and the creatures who live there. All of the people I know feel the same way.

The idea of closing off another 60 million acres of land to roadless areas seems crazy to me. We have lost countless small businesses and mills as it is and after the fire season of 2000 it amazes me that this is even an issue. We enjoy clean air and water here in Montana but with all of the smoke from the fires last

summer many people suffered from respiratory problems, especially the elderly, which is a high percentage of our state's population. (Individual, Kalispell, MT - #A994.10130)

**BECAUSE IT DOES NOT ADDRESS THE DIFFERENT NEEDS OF EASTERN AND WESTERN FORESTS**

The proposed Roadless Rule is a continuation of the non-use policies presently saturating the management of our forests. Preservation by non-use may be reasonable in extreme cases like New Jersey but it is not necessary in the Rocky Mountain region.

The proposed Roadless Rule is way out of balance with the needs of the public. (Organization, Helena, MT - #A13226.10130)

I am not sure that you read these letters. I think that you just count for or against. I live in the west not the east and I want a say in what happens to the forests in my area. I don't know anything about the National Forests in the east and wouldn't presume to tell them how to manage them. I don't want a one-size-fits all policy for our forests. In my opinion this isn't a Congressional decision. (Individual, Centerfield, UT - #A12776.10130)

**BECAUSE IT DISPROPORTIONATELY AFFECTS WESTERN STATES**

We would like to add our support in opposition to any further designation of roadless or wilderness areas.

Our western states have more public lands than any other geographical area (with the possible exception of Alaska) and this land mass should not be treated as a National Park for the rest of the country. (Individual, Columbia Falls, MT - #A1070.10112)

I am opposed to the roadless plan to lock up the natural resources and our public lands, I am an avid snowmobiler, hunter, fisherman, and all around user of public lands. This plan will lock me and thousands like me out!!! STOP THE WAR ON THE WEST!!!! (Individual, Whitefish, MT - #A1030.10130)

There is an angry rebellion gathering momentum. The decision to 'rethink' the recent changes in Federal Roadless Policy may be just in time; an opportunity to hear what the people of Nevada, as well as all the western states, are beginning to stand up and shout. (Individual, Gerlach, NV - #A1066.10130)

**BECAUSE IT WILL MAKE THE JOB OF MANAGING FORESTS MORE DIFFICULT**

In the environmentalists' fight to obtain this roadless area they placed a full page ad in the Idaho Statesman indicting that nothing would change if the roadless initiative was enacted. If this is truly the case, then why do we have to enact such a ridiculous policy in the first place. Of course the answer to that is that it does change things, it makes your job of managing an already cumbersome and politically controlled national forest system even more difficult. (Individual, No Address - #A14.10112)

In closing, I will refer to the current society of American Foresters Position Statement, *Roads in Forests*, renewed June 13, 1999, which explains the purpose of roads in the national forest system. "Under the Multiple Use and Sustained Yield Act, . . . the National Forest Management Act, the Forest Service . . . manages for seven separate purposes—water, wildlife, recreation, timber production, grazing, minerals, and wilderness." "To implement management plans, the Forest Service, and all forest managers, must have access to their forests through a well-maintained road system. In the case of public forests, this requires a substantial, dependable road budget for maintenance as well as reconstruction. Roads should be seen as a capitol investment, "We are concerned that the roadless regulations deviate from the multiple use statutory intent, and is inconsistent with the society of American Forester's road position. (Association, Salem, OR - #A21754.10112)

**BECAUSE IT IS BASED ON INADEQUATE INFORMATION**

The lack of site-specific information available to the Forest Service during the promulgation of the January 12, 2001 rule is readily apparent when one considers that, as an example, the "roadless area"

within the Grand Mesa-Uncompaghre National Forest system (“GMUG”) here in Colorado included within its boundaries 1) an existing underground coal mine which had previously conducted surface activities using temporary roads, 2) areas which in fact (if not by regulatory definition) contain roads, and 3) federally-owned minerals being developed under existing lease and ripe for future lease. The GMUG “roadless area” is adjacent to other existing mines operating under recently granted BLM leases which eventually would move into that area as additional coal resources are pursued. The dearth of information available to the Forest Service and to the public resulted in a predetermined outcome as boundary lines were fixed under a “national” rule before more specific local information was made available which pointed to a different approach. (Business or Association, Denver CO - #A20676.10141)

#### **BECAUSE ITS SUPPORT HAS NOT BEEN ADEQUATELY DEMONSTRATED**

The Roadless Conservation Rule was NOT supported by a majority of Americans, so therefore, it needs to be either corrected or eliminated. (Individual, Orange, CA - #A6764.10131)

The roadless initiative was ill conceived and poorly executed—at the instigation of conservation organizations who never have (and probably never will) represented the will of the people of this country. One point five million out of 250 million, plus—what a joke . . . (Individual, Gorham, NH - #A8943.10132)

#### **BECAUSE THERE IS OPPOSITION TO IT**

On March 31st of this year, the Montana State gave final approval of a House Joint Resolution in support of multiple use of National Forests and urging Congress and the President to overturn the Federal Roadless Initiative. That resolution was patterned after the Roadless Resolution passed by the membership of the Montana State AFL-CIO at their 2000 annual convention.

The Montana Coalition of Forest Counties has taken a strong position against the proposal. Lincoln and Flathead County Commissioners each placed the issue on their respective ballots and approximately 80% of the voters voted in opposition to the Roadless Initiative. (Elected Official, State of Montana, MT - #A18045.10130)

It astounds me that in spite of the reported over 1/2 million comments that were submitted in opposition to the roadless rule that the agency proceeded with the plan like no one had objected to it. (Individual, Austin, NV - #A15794.10130)

#### **BECAUSE IT WILL PROMPT CIVIL DISOBEDIENCE PROTESTS**

I could go on and on concerning the financial impact the rules would have and expound on dozens of other arguments. Let me forego all that and close by saying this. In 1776 a band of patriotic Americans boarded a ship in Boston Harbor and threw tea overboard in the first act of rebellion against a tyrannical government which had overstepped its bounds. I would consider the imposition of the proposed forest service rules to be just such an overstepping of government’s bounds in the instant case. If that happens, I will be one of the first to step to the plank and walk up the gangway to act in defiance of my government. I say that as a proud citizen and a veteran who has served our country in time of war. A few weeks ago I pointed out our kitchen window toward the mountains we love so dearly and told my wife that if people like Al Gore and the Forest Service have their way, we were as close to those mountains as we would ever be able to get. I tell you now, I am not alone in my sentiment. My passion for my mountains is shared by thousands upon thousands of others. We are a vast army who are not going to simply stand by and watch the Forest Service take away our rights of access to the forests we have been raised in and are now raising our children and grand children in. I will not be alone if and when the time comes that I must raise my mighty pen, my wallet and my fist against my government trying to take away my access to the mountains and forests that have formed a heritage and a home for me and my family. (Individual, Mount Pleasant, UT - #A26116.10112)

#### **BECAUSE IT WILL INCREASE SAFETY HAZARDS**

Restricting options for fire-fighting and forest management does not serve the public interest or protect the National Forest System. In its current form, the Final Rule will impose negative economic effects that are not justified by any corresponding benefits. Rather, the Final Rule compounds existing safety

hazards, lacks an important phase of regulatory review, and arguably does not meet the Forest Service's mandate to manage and preserve NFS resources. HAI [Helicopter Association International] urges the Department of Agriculture to revise or repeal the Final Rule at its earliest opportunity. (Business, Alexandria, VA - #A30200.12120)

## **12. Public Concern: The Forest Service should not use inadequate road maintenance funding as a reason for developing the Roadless Area Conservation Rule.**

One of the problems cited by the agency as a justification for this rule is the fact that the USFS does not have adequate resources to properly maintain existing roads. This problem also can be addressed by considering an alternative of requesting additional funding for roads from Congress, or allowing road maintenance by the private sector which uses them for resource development. None of these alternatives were considered by the agency.

The January 12 Rule could have been crafted so that temporary (non-paved) roads may be permitted on an as-needed basis. Such an alternative should have been considered and published for public comment. (Business or Association, Spokane, WA - #A17351.17240)

## **13. Public Concern: The Forest Service should recognize that support for the Roadless Area Conservation Rule is the result of misrepresentation of current forest management practices.**

The "wide public agreement" cited in support of the former President's plan is, I would argue, the result of years of misrepresentation of both the nature and the impacts of current national forest management. Long-time opponents of road building in national forests, such as the Wilderness Society and the Sierra Club, have joined with lawmakers who are anxious to curb spending on "corporate welfare" to continue their opposition to "below cost timber sales". The implication of much of what has been said is that roads are built in national forests solely for the purpose of making it easy for private companies to log those forests. Ignoring the fact that contributing to the nation's timber supply is one of the reasons for the existence of the national forest system, it must come as a great surprise to the millions who drive into national forests to hunt, fish, picnic, camp, and sight-see that these roads are intended only for logging. In truth, logging income pays for most of the roads, but we seldom hear talk of "below-cost recreational services" being provided. It would be an interesting experiment for the Forest Service to shut down its road system to public access and see if loggers are the only ones who complain. (Professional Society, Orono, ME - #A17644.15120)

## *Revision of the Roadless Area Conservation Rule*

## **14. Public Concern: The Forest Service should revise the Roadless Area Conservation Rule.**

This current Roadless Area Rule as approved by President Clinton is grossly wrong - procedurally, politically, economically, socially, biologically, and particularly defies common sense. It needs to be reassessed and re-issued considering the biological and environmental needs of the forest, the social and economic needs of the public and to place the desires of some segments of the grossly underinformed public in a proper context. (Individual, Whitefish, MT - #A13335.10130)

### **TO ADEQUATELY ADDRESS FOREST HEALTH, ACCESS, AND LOCAL INPUT**

The Rule must be significantly revised to promote forest health, access, and local input. Careful, active, and local forest management will ensure the long-term protection of our forests. Modifications to the Rule should be facilitated to properly implement Congress' mandate for multiple uses of our forest. Local forest decisions should be supported by accurate, site-specific information. (Elected Official, Shasta County, CA - #A4943.10130)

The rule must be significantly revised to adequately address forest health concerns, access to private and state inholdings, and local input. Roadless areas must be accurately mapped at the forest level, including an inventory of classified and unclassified roads, in order that informed decisions can be made. Modifications to the Roadless Area Conservation Rule must take into consideration the need to access the national forest to provide for Congressionally mandated multiple uses. (Elected Official, Afton, WY - #A6066.10141)

The Coeur d'Alene Chamber of Commerce supports environmentally sensitive and responsible natural resource management, which ensures that forests are healthy for all who depend on them. In the spirit of keeping our public forestlands healthy and open to families, recreationists, foresters and other land management professionals, the Chamber asks the Forest Service to revise the Roadless Rule so that it truly protects roadless area values. Without a comprehensive and locally based process, future decisions regarding how to manage roadless areas will not result in any real protection of the many forest values people care about. We encourage you to provide a meaningful process that will allow those who are most affected by management decisions on public lands to be included and heard. (Business, Coeur d'Alene, ID - #A18004.10130)

The roadless designations should be based on what is good for the locale on a local level, say the state level. It should be based on what is good for the forests, people and animals that inhabit it, not on some group's personal agenda for the west. (Individual, Centerfield, UT - #A12776.10130)

#### **TO ADDRESS ACCESS FOR RECREATION AND RESOURCE USE**

I am writing to support a decision to repeal the Forest Service's Roadless Area Conservation Rule as it now stands. This policy is the product of the most one-sided opinion of federal rulemaking in history.

The rule represents a one-sided approach to forest conservation. Each specific area needs to be examined and ALL parties concerned must be informed and given their fair chance to voice their opinions.

The best thing to do is to trash the 'roadless plan' as it is written and draft a new plan for the National forests that includes access for the public for recreation and responsible extraction of our valuable resources that these forests provide. (Individual, Phoenix, AZ - #A1179.10130)

The Roadless Area initiative must be tossed out and rewritten as it did not address issues of recreational access. (Individual, Thousand Oaks, CA - #A891.10130)

#### **TO OMIT FROM CONSIDERATION LANDS SUITABLE FOR TIMBER REMOVAL**

I would like to see you revise the plan, omitting land that is suitable for timber production unless it also has some good potential for recreation or other uses. (Individual, Bigfork, MT - #A1079.10130)

#### **TO PROVIDE FOR REASONABLE MANAGEMENT**

I'm taking the time to write to you today because I'm concerned about the unjust closure of public land to use by responsible U.S. citizens. The dishonest establishment of the Clinton/Gore Roadless Rule made me very uneasy about the way access to public land is being handled. Caring and fair-minded individuals like you and I can see that it is an extreme measure that greatly needs revision. I urge you to modify this rule so that public land is thoughtfully and responsibly cared for while still being available for reasonable, managed use. No one wants these lands abused, but over-reacting to extremist alarms helps only a few special interests, and shuts the rest of us out. Please take another look and the roadless rule, and make it into something that it is good for everyone. (Individual, Pleasant Plains, IL - #A5445.12220)

#### **BECAUSE IT WAS THE PRODUCT OF AN INADEQUATE PROCESS**

Please fix the flaws in the Roadless Area Conservation Rule. Their inadequate process was contrary to law. Local, State and Federal concerns were ignored. 421,000 acres of private land were affected.

Forest health, public access and local input were not addressed. Mapping and classifications of roads did not get done. Congressionally mandated multiple users were not considered. (Individual, Deer River, MN - #A2873.10120)

I would like to express my appreciation to you and the Forest Service for deciding to take a more informed look at the Roadless Area Conservation Rule. This original process was started in a flawed and illegal manner and seemed to have its conclusions before it began to analyze the information. (Association, Yreka, CA - #A8302.10120)

**15. Public Concern: The Forest Service should recognize that the Advance Notice of Proposed Rulemaking does not substantiate the need to revise the Roadless Area Conservation Rule.**

Despite a series of assertions about the existing Rule and roadless area management more broadly, the ANPR does not substantiate the need for revisiting this long-contentious issue. Some of its assertions directly call the existing Rule into question; others do so only indirectly. None, however, shows how the rationale for and substantiation of the Rule as faulty or inadequate. (Organization, Olympia, WA - #A20145.11100)

*Strengthen the Roadless Area Conservation Rule*

**16. Public Concern: The Forest Service should strengthen the Roadless Area Conservation Rule.**

I would like to see the roadless plan preserved and even expanded. The timber companies represent a very small percentage of the population of the country and the vast majority of us want those roadless areas preserved. In my state of Washington, on the previous public comment period the responses were 96% in favor of the roadless initiative. If you are a Government of the people and not of the corporations, which is of course a debatable issue, then please preserve these great and beautiful lands for my son and his children. (Individual, Olympia, WA - #A534.10150)

The rules of Roadless Area Conservation need to be strengthened, not weakened. The total National Forest System is only 8.5 percent of the total land base of the United States. That leaves 91.5 percent for economic exploitation. The 58.5 million acres of inventoried roadless areas should not be opened for economic use. The United States must protect and conserve this national resource for the treasure it will be in the future. (Individual, Zanesville, OH - #A758.10150)

The Roadless Area Rule currently under reconsideration will preserve these jewels. It does not need to be changed. You ask, how should communities and private property near inventoried roadless areas be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal lands? The current Rule allows for emergency access to all Roadless Areas; if anything this should be strengthened to ensure a continuation of Roadless status after emergency roads have been constructed. (Individual, Brunswick, ME - #A5070.10150)

The Roadless Area Conservation Rule should be implemented without change and strengthened to stop damage to these areas by ORV use and hard rock mining. All timber sales in the Tongass National Forest that violate the Rule should be stopped immediately. This administration should defend the Rule against lawsuits and quit trying to weaken environmental safeguards and public participation processes in the development of forest plans. (Organization, Tulsa, OK - #A15362.10150)

**BY ELIMINATING EXCEPTIONS**

If the Clinton administration's Roadless Initiative needs any changes at all, they are to tighten up some of the loopholes that allow exceptions, such as for "public health" and "safety". (Individual, Leadore, ID - #A20898.10150)

**BY IDENTIFYING AREAS WHICH SHOULD NOT BE EXEMPTED FROM THE RULE**

The Service should begin by defining the types and locations of roadless areas for which exceptions to the prohibitions should not be considered. This would provide an important improvement to the Rule by

placing the most socially and ecologically important inventoried areas off limits to road building and timber harvesting. Through the rulemaking, the Service should establish categories of roadless areas for which exceptions should not be granted, and then document and map those areas in the course of subsequent forest plan revisions. These would include areas with important or scarce social and ecological values such as: source drinking water areas, reference areas for research, areas of high or unique biological diversity and old growth forests, areas where other roadless lands are scarce, areas that provide cultural or historic importance, and all areas that provide unique or important season habitat for wildlife, fish and plant species. (Organization, Washington, DC - #A23283.10150)

## *Defense of the Roadless Area Conservation Rule*

### **17. Public Concern: The Administration should defend the Roadless Area Conservation Rule against lawsuits.**

Failing to appeal the Idaho court's preliminary injunction blocking enforcement of the January 12th rule, constitutes an abdication of responsibility and dereliction of duty on the part of the new administration. (Individual, Chico, CA - #A17483.10159)

It is the Bush Administration's attempts to thwart The Rule that is of greatest concern by far. The Bush Administration should stop . . . undermining the legality of the rule (which they are doing by collaborating with the plaintiff) and should instead, immediately begin mounting a vigorous defense against the lawsuits challenging the Rule. (Individual, Hatboro, PA - #A8834.10159)

By allowing the deadline to pass, the federal government failed to appeal the court's decision. Fortunately, a coalition of Environmental Organizations has stepped in to fill the breach, despite the handicap of the federal bailout. Due to its failure to appeal, the new administration has now turned its back on, and shown a total lack of concern, for the 1.6 million interested parties who have submitted comments, 95% of whom supported the prohibition of new roads in the national forest roadless areas.

Dale Bosworth, in his letter of June 7, 2001, stated that "it is necessary for the agency to act decisively, proactively, and with common sense to ensure that our efforts to protect roadless values will not be confined to legal proceedings in courtrooms scattered throughout the country."

Rather than vigorously defending the public interest in open court, the Forest Service has acted in fear of litigation. Perhaps their actions are based on the fact that the court's decision is consistent with their existing bias demonstrated in the Federal Register and the several press releases of the USDA. The new administration appears to put its total faith in one lower court judge's decision, without review by a higher court. Instead of judicial review in open court, it appears that the decision will be made in Washington D.C. behind closed doors by politically motivated decision makers. If the conclusions already adopted by the new administration are carried out, the roadless issues will not be carried out by numerous courtrooms throughout the country, but will be based on local concerns confined to vastly more individual national forest proceedings throughout the entire nation. (Individual, Chico, CA - #A17483.10159)

I write to ask, as an official comment on any changes to the Roadless Rule, that the rule not be undermined through the creation of loopholes and exemptions to the protections in the original policy. Similarly, I ask that you do whatever is necessary to defend the current rule, that was to be implemented in June, from current legal challenges. Then the public could regain some faith in the Forest Service as an organization that was dedicated to environmental protection and restoration of public lands instead of one that was captive to corporate interests. The Roadless Area Conservation Rule should be implemented immediately, and without exemption, as it was signed on January 5, 2001. (Individual, Portland, OR - #A4816.10150)

You also claimed in the Federal Register, as further justification for the current rule making, that, "eight lawsuits, involving seven states, in six judicial districts of four federal circuits have been filed against

the January 12, 2001 rule.” Apparently you think that because so many suits were filed in so many districts in so many circuits, that you should just roll over and play dead. The filing of a lawsuit, of even many lawsuits, does not mean, however, that the federal government took an improper action. The federal government should have vigorously defended its rule on court, rather than caving in and starting the rule making all over again.

Also in Federal Register you cite the preliminary injunction issues by the Idaho District Court. I believe this court’s decision will be easily reversed on the appeal which has been filed by third parties. . . . The federal government should have appealed the District Court’s decision, and should have vigorously defended its Roadless Rule before the Circuit Court. Instead, no appeal was filed, and rather than waiting for a decision on the appeal filed by other parties, the government decided to launch another public process and change the rule. (Individual, Sitka, AK - #A24495.10159)

Do you remember Attorney General John Ashcroft saying during his Senate confirmation hearings that he would enforce the laws of the land? Why did Ashcroft’s office not vigorously fight the lawsuits brought by Boise-Cascade, the state of Idaho and others against the Roadless Area Conservation Rule? No matter how ill-advised it was for the Bush administration to put the current comment period, we are faced with the following questions: During this holding period, is the Roadless law of the land, or is it not the law of the land? If it is not the law of the land, how can the Boise-Cascade, the state of Idaho and others bring lawsuits against it? Should not any attempt to bring such suits against non-law have been forcefully fought by the Attorney General’s office? If the Roadless Rule is the law of the land during this holding period, why did the Attorney General’s office only put up a token defense in court against the lawsuits? Is it that by some TECHNICALITY that the state of Idaho, Boise-Cascade and others can bring lawsuits against a law of the land, which at the same time is not the law of the land from the standpoint of the Attorney General’s office? (Is this not comparable to “It depends on what your definition of ‘is’ is”?) Did John Ashcroft give FALSE TESTIMONY before the Senate confirmation committee when he said that he would enforce the law of the land? (Individual, Los Alamos, NM - #A13846.10159)

### **18. Public Concern: The Administration should not defend the Roadless Area Conservation Rule against lawsuits.**

Most Americans oppose this rule. Don’t implement the original rule, and don’t waste taxpayer money defending it against industry and other lawsuits. These are PUBLIC lands and do NOT belong to the environmentalist crowd alone! (Individual, Marthasville, MO - #A6704.10130)

### *Other*

### **19. Public Concern: The Forest Service should clarify the Roadless Area Conservation Rule.**

I am writing to state my support of the Forest Service’s efforts to fix the fatal flaws in the Roadless Area Conservation Rule. This rule was passed with flawed if not misguided information and is subject to legality due to its substantive concerns by elected officials. It is also difficult to interpret. (Individual, Mayport, PA - #A8711.10141)

### **20. Public Concern: The Forest Service should consider that it has already issued a decision on the Roadless Area Conservation Rule and should now emphasize work on more pressing issues**

The Forest Service has already issued a decision for the protection of inventoried roadless areas. It seems that the only reason you are revisiting this issue is because of the new administration. The Forest Service should build on its past accomplishments, not undo them. The Forest Service should emphasize work on more pressing issues, such as compliance with NEPA, the threat of unnatural wildfire, and the spread of noxious weeds. (Individual, Bemidji, MN - #A8784.10150)

**21. Public Concern: The Forest Service should separate the Roadless Area Conservation Rule into two policies to administer lands in the eastern and western United States.**

There appears to be a much different view about public lands in the western US than here Back East of the Mississippi River, and there are a lot of differences in the areas being considered. The eastern US has a much larger population and unfortunately very little public land as compared to the West. We seem to treat our areas as more tourism/recreational areas versus the agricultural/resource banking of western counter parts.

The Forest Service, if it hasn't already, should seriously consider breaking the roadless area plan into two (2) separate plans for administrative purposes. This would allow the Forest Service to address issues such as fire hazards and inholdings, which are more serious in the West. The eastern US has very little roadless areas left and reserve/refuges for many plants and animal species that are overlooked or unknown to the general public. The forest system holds much more than robins, deer, bear, and a few raccoons. Many new animals are found in the Smokey Mountains National Park each year, though they may be butterflies, moths, or lichens, it still matters. It wouldn't be here if it didn't. (Individual, Granite Falls, NC - #A21281.45341)

**22. Public Concern: The Forest Service should ensure that one state does not shoulder disproportionate effects of a national roadless rule.**

The Forest Service must be willing to develop a procedure to ensure that its national policy is carried by the nation as a whole. In other words, the Forest Service must ensure that the citizens of Wyoming are not forced to shoulder a disproportionate share of what is in essence a national decision, demanded by people who have never stepped foot in the State and will suffer no economic or emotional hardship as a result of sending the Service a preprinted postcard allegedly "supporting" the Roadless Actions. If the Forest Service cannot ensure that Wyoming does not end up carrying a particular national policy, then it should not be adopted. Until the impact of the Forest Service's actions can be distributed equally across the entire country, then the interests of Wyoming must take precedence. (State Agency, Cheyenne, WY - #A22608.13120)

## Issue Identification

This section includes one subsection: Adequacy of Questions in the Advance Notice of Proposed Rulemaking.

### Adequacy of Questions in the Advance Notice of Proposed Rulemaking

#### Summary

In general, comments which question the adequacy of the 10 questions posed in the Advance Notice of Proposed Rulemaking come from those who ask that the Roadless Area Conservation Rule be implemented. Those who ask that the Rule not be implemented do not often comment specifically on the adequacy of the 10 questions. These respondents view the questions as adequate, not by saying it specifically, but in their general agreement for taking another look at issues associated with roadless areas.

Most commonly, respondents who question the adequacy of the 10 questions allege that the questions are unclear, biased, misleading, and have built-in assumptions designed to lead to certain responses. Some believe that these questions have already been addressed in the previous rule and it is disingenuous to ask them again. These respondents sometimes assert that they do not think the new Administration likes the previous policy, so they are looking for different answers that seem to have nothing to do with genuine concern for social, economic or ecological issues. Respondents state that the questions are framed to favor advocates of active management and allows resource users to define the terms of the debate.

As noted above, the view that the 10 questions are adequate is generally implicit in comments which stress the need to more fully consider roadless issues before making a decision. A few respondents, however, explicitly say the questions are a positive step toward adequate public involvement.

#### *Adequacy of Questions; General*

#### **23. Public Concern: The Forest Service should recognize various problems with the 10 questions asked in the Advance Notice of Proposed Rulemaking.**

##### **THEY ARE UNCLEAR**

Really, it is unclear what is meant by “local forest planning” in this question. For sure, this must not mean that local citizens should have any more influence over roadless decisions than non-local citizens.

Also, I continually see the terms “protect and manage” when reading what the USFS [United States Forest Service] will do within inventoried roadless areas. It’s unclear what the author of the questions meant by including these 2 words. Why do they automatically belong together? What’s the difference between these 2 words as they are used here? Is it possible to protect an area and not manage it? Yes, it sure is. It certainly is possible to manage an area, and not protect it. This has been happening (in places) on federally managed Forest Service lands for decades. (Individual, Grangeville, ID - #A830.11110)

[How should roadless areas be managed to provide for healthy forests and to protect forests from severe wildfire, insects and disease?]

The question is a paradox; a question with diametrically opposed statements. (Individual, Philomath, OR - #A943.11130)

These properties are in roaded areas, so if any fire harms them, it is in a roaded area. This question is pretty strange. (Individual, Wheaton, IL - #A52.11140)

This question is vague. What are you evaluating the IRAs for? Are you evaluating them for consideration as designated Wilderness Areas? Are you evaluating them for recreational potential? Clearly, the factors to consider when “evaluating IRAs” depend upon the purpose of the evaluation. The Forest Service has already identified positive values of roadless area conservation, such as wildlife habitat, clean water, recreational opportunities, scientific research values, and even economic values that come from recreational use and the improvement of nearby property values due to the improved quality of life that comes from nearby natural areas. (Individual, Palo Alto, CA - #A15827.45100)

The question is worded, what are the characteristics, environmental values, social and economic considerations and other factors the U.S.F.S. should it consider as it evaluates inventoried roadless areas. The question should have been worded thusly. What are the characteristics, environmental value, social and economic “values” and other factors the U.S.F.S. should consider as it evaluates inventoried roadless areas. (Elected Official, Iron County, MI - #A3612.11160)

[Question 3] This question implies that fire, insects, and diseases are undesired elements in a forest ecosystem, even in roadless areas. I would have expected a question to have been phrased in this way 40 years ago, but not today in light of a more thorough understanding of forest ecosystem processes. The use of the term “healthy forests” in this context is unscientific and inappropriate (see McClelland and McClelland. Wildlife Society Bulletin. 1999. 27[3]: 846-857). In the remaining roadless areas, commercial logging is not needed as part of any scientific management strategy. (Individual, West Glacier, MT - #A5946.30100)

#### **THEY ARE BIASED**

This is another unfair question in that it suggests States, tribes, organizations, and private citizens do not presently have access to their properties. There is nothing in the ban on new roads that closes any existing access to anyone’s properties. The only access that this ban on new roads would entail is that it will prevent timber and mining companies from destroying portions of our forests by grading roadways so they can access our natural resources, and therefore destroy even more timber and remove more hills and mountains for profit. (Individual, Port Angeles, WA - #A1044.11150)

The Roadless Area Conservation Plan already provides for access to state and private in-holdings. Roadless areas would be treated like any other national forest lands regarding in-holder access. This again is a biased question that can leave a reader with the false conclusion that there is no in-holder access under current rules. (Individual, No Address - #A4502.11150)

This [Question 3] is a biased and bold question! I will illustrate by rewording it. How should inventoried roadless areas be managed to provide for healthy watersheds, including playing an ever more-important role in protection of biodiversity, protection of water quality, and providing the correct balance of natural processes to give the ecosystem the resiliency to weather insect and disease outbreaks or wildfire over many disturbance cycles, spanning hundreds of years? (Individual, Lacey, WA - #A17998.11130)

How should communities and private property near inventoried roadless areas be protected from the risk associated with natural events, such as major wildfires that may occur on adjacent federal lands?

I would turn this around to read: How should inventoried roadless areas be protected from the risks associated with proximity to communities and private property, such as tree or wildlife poaching, human-caused wildfires, illegal roadbuilding etc? (Individual, Lacey, WA - #A17998.11140)

We believe the public has already spoken on this matter. This new round of comment is less open and responsive than the first round. There are no public hearings and the ten questions are inappropriately biased against roadless area protection, i.e. we all want to see lives and homes protected during wildfire, but roadless areas play little if any role in that protection. A new round of comments would likely yield the same results as the previous round and is therefore unnecessary and a waste of taxpayer dollars. We can only conclude that this latest call for input is an attempt to delay, weaken, or perhaps ultimately scrap the RACR. (Organization, Missoula, MT - #A21359.11100)

#### **THEY HAVE BUILT-IN ASSUMPTIONS**

Should Inventoried Roadless Areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation, or should they be maintained under a specific designation for roadless area management under the forest plan?

The phrasing of this question assumes that the RACR will be shelved and that all roadless area considerations will revert to the individual forests. It is my understanding in responding to this questionnaire that this has not yet been decided. I hope this is the case. (Individual, Seattle, WA - #A11805.25000)

The “10 questions” format for scoping on this proposal is also inappropriate, as it presupposes an outcome that drastically revises the RACR. The questions also pose issues that have been asked since the first day of RACR rulemaking. I must therefore conclude that these questions simply provide a cover of rationality over a decision prompted by a change in Administration, not by any genuine policy matters grounded in ecology, sociology, or economics. (United States Representative, Georgia, - #A693.11100)

The assumptions underlying your questions are blatantly anthropocentric, and are skewed toward allowing continued exploitation of natural areas. They seemingly grow out of the conviction that humans are the only species that matters, and that they have the right to appropriate every square inch of the earth’s surface to their own material ends, regardless of the damage done to plant and animal communities. Property rights are evidently assumed to trump all other rights, just as monetary values are assumed to trump all other values. Monoculture is better than diversity, and 100 years of “custom and culture” are entitled to jeopardize the results of millions of years of evolution. (Individual, Dallas, OR - #A3697.11100)

[Question 9] The very premise of this question is false and therefore it should be either rephrased or eliminated from consideration. (Organization, Denver, CO - #A29624.11190)

#### **THEY LEAD TO CERTAIN RESPONSES**

We have made a few brief comments within the context of the 10 questions in the Federal Register notice. We do note that the text of the questions, many of which seem to overlap, seems predisposed to yield a certain answer. Additionally, the questions ask for opinions on natural resource management much broader than the rulemaking in a short (60-day) comment period. Although we do not disagree with the direction the 10 questions lead respondents in, we think this is a peculiar and possibly inappropriate way to elicit public comment. (Association, Washington, DC - #A17887.11100)

Should inventoried roadless areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation or should they be maintained under a specific designation for roadless area management under the forest plan? . . . You have crafted this question in a leading fashion, with intent to obfuscate the matter and arrive at a predetermined outcome, which is to throw the Rule out by throwing it into the planning process for each national forest. This would be a disastrous outcome because it will result in certain elimination of inventoried roadless areas. (Individual, Ward, CO - #A18076.11180)

[Question 3] Well, what do we mean by healthy forests? That’s a loaded term. Allowing wildfire to play its natural role so that buildup of hazardous fuels does not occur seems to be wise; active management of

the urban interface seems to be wise, but wholesale “management” of large blocks of remote backcountry seems ridiculous. The Bitterroot and other fires have shown that what matters in saving buildings is treatment in the immediate vicinity, not the backcountry miles away. The way this question is worded appears to lead the respondent toward an answer that must already be in someone’s mind. (Individual, Jackson, WY - #A10527.30100)

#### **THEY ARE TOO OPEN TO INTERPRETATION**

That’s a broad question that can be interpreted to mean too many different things. (Individual, Eagle Creek, OR - #A29956.11130)

#### **THEY ARE NOT RELEVANT**

[Question 8] This does not seem to be relevant. Some of the current roadless areas may become special wilderness areas. So what? The important thing is that the roadless areas are protected from roads and logging. (Individual, Elmhurst, IL - #A8039.25000)

#### **THEY DISTRACT PEOPLE FROM THE MAIN ISSUES**

You really know how to word a question to get the goat of those who feel the “local forest plan revision process” is simply a way to thwart the will of the majority. This question is entirely independent of the original and rightful ruling and could be addressed without revising the rule and it appears to be an attempt to distract opinion from the main issues. Geez people, the rightful ruling states that, “areas currently inventoried as roadless remain roadless without resource extraction”. Is it that complicated? As long as that happens then, the ruling and the people’s will be upheld. (Individual, Seattle, WA - #A21682.11180)

#### **THEY DISCOURAGE PUBLIC INVOLVEMENT**

Our organization objects to the delayed implementation of the roadless policy by the Secretary of Agriculture. We object to the questions that you put forth—directing public comments to such issues as fire, access to inholdings, floods and forest health. This directed questioning tactic discourages public input to such issues as wildlife or fish species viability, quality wildlife habitat, clean water, backcountry hunting experiences and scenery. As you are well aware, the Science report for the Interior Columbia Basin Planning effort pointed out that roadless areas were the most intact parts of the Rocky Mountain ecosystem in the planning area. We are disappointed and discouraged that a professional land management agency would resort to such public involvement tactics to solicit a skewed public response on such valuable natural resources affecting far more resources issues than those for which you solicited comment. (Organization, Helena, MT - #A8255.11100)

First of all, I think your 10 questions are designed to intimidate citizens from commenting on the “roadless area” issue. And yes, I do realize these questions are optional. (Individual, Idaho Falls, ID - #A27740.11100)

#### **THEY ONLY REFLECT THE VIEWS OF THE SMALL MINORITY WHO OPPOSE ROADLESS AREA PROTECTION**

The ten questions for public comment mostly rehash the complaints and myths of the small minority that opposes roadless area protection. For example, the ANPR asks for input on the best way to provide access to private and state land inholdings in roadless areas, even though the Roadless Rule makes it abundantly clear that it has no effect on inholder access. These issues were fully addressed during the three-year public process leading up to January 2001. (Organization, Pikeville, TN - #A5167.10152)

#### **THEY ATTEMPT TO JUSTIFY THE REVERSAL OF THE ROADLESS AREA CONSERVATION RULE**

We feel the 10 questions, to help guide the decision process, are just a poor attempt to illicit opinions and comments that coincide with those of industry so that the reversal of these rules can be justified. We are insulted by the way the questions attempt to manipulate the public into responding unfavorably to the Current Rules. (Individual, Seattle, WA - #A19246.11100)

The above are all shamelessly leading questions, obviously fishing for an answer to justify the Forestry Circus', the current administration's and the various public lands commodity industries, and their bought-and-paid-for elected hacks' clamor for "local control". A pox on all of you.

This is an obvious situation where they didn't like the answers received, so they reworded the question, making them more leading and asked them again, hoping for answers more to their liking. (Individual, Dillion, MT - #A28767.11100)

#### **THEIR INTENT IS TO DIVERT ATTENTION FROM THE ADMINISTRATION'S ATTEMPT TO DISQUALIFY THE RULE**

The 10 questions are general in scope and non-scientific in nature, and one can only assume that their intent is to divert attention from the administration's attempt to completely disqualify the Rule. (Individual, Livingston, MT - #A17081.11100)

#### **THEY ARE AN ATTEMPT TO GIVE GREATER WEIGHT TO LOCAL CITIZENS' COMMENTS**

In earlier stages of the RAC process a truly historic level of public involvement occurred, both on a national level and on a local level throughout the National Forest system. The process was fair and open (in sharp contrast to this one's lack of any intention to hold public hearings). Comments from the whole spectrum of local advocacy groups was solicited and obtained. Local people turned out in droves to voice their opinions. The interest groups that are not objecting to the outcome are the same ones who have been benefiting at the expense of other users and the public treasury for decades. Dissatisfied with the result of open and public hearings, they now want a more closed process specially designed to give greater value to their comments than the ordinary citizen's. We believe question two is a sham that is intended to produce the rationale for granting that desire. (Organization, Juneau, AK - #A23263.11120)

#### **THEY FOCUS EXCLUSIVELY ON THE ROLE OF LOCAL FOREST PLANNING AND FAIL TO MENTION THE ROADLESS AREA CONSERVATION RULE**

The management of roadless areas is a matter of national importance. We are concerned that the questions to the public in the July 10 notice focus exclusively on the role of local forest planning in managing the country's national forests—and never mention the role of national policies like the roadless rule. We urge the agency not to undermine the rule's guaranteed protections for future generations by giving local agency officials broad discretion over the management of roadless areas. (United States Senator, New York - #A23325.13110)

#### **THEY ENCOURAGE CONFLICT BETWEEN DIVERSE GROUPS**

I recognize that this input was solicited in order to get comments on the rule-making process. As for the questions on the USFS roadless area response website, in my opinion they take the wrong approach. They seem directed at creating an area-by-area food fight at the local level, pitting environmentalists against the timber, mining and ranching interests (and perhaps some tribal elements), to determine the fate of each and every tract of land. (Individual, Whitethorn, CA - #A27998.11100)

#### **THEY ARE FRAMED TO FAVOR RESOURCE USERS**

I am outraged by this process and the questions included with the Advance Notice of Proposed Rulemaking. The framing of the questions show bias favoring advocates of exploitation and of "local control," which translates into weakened protection of roadless areas. I am one of many, many citizens who spent hours and hours participating in the Forest Service's three-year process that led to the Roadless Rule, and I am incensed that more of my time is required to respond to this issue after the conclusion of the process and the announcement of the Rule, and that efforts are made to relax environmental safeguards protecting our forests and to weaken public participation in forest management decisions. (Individual, Blue Ridge, GA - #A15666.11100)

#### **THEY LET RESOURCE USERS DEFINE THE TERMS OF THE DEBATE**

And now, they're asking for more comments to further delay protection for wild areas. It's like telling citizens to vote again because they didn't like the results. They've posed ten questions that let industry define the terms of the debate. The questions favor private over public rights, subdivision and industrial development over conservation, and they raise many issues already addressed by existing policies—such as fire, access to inholdings, floods, and forest health. (Individual, Twain Harte, CA - #A15652.11100)

**THEY DO NOT CONTRIBUTE TO A HEALTHY AND REASONABLE DEBATE ABOUT THE VALUE OF ROADLESS AREAS**

The recent attempt to revisit the roadless area policy is appalling, and shows a disturbing contempt for public participation. The 10 questions posed for consideration are absurdly slanted toward heavy handed management, and do not contribute to a healthy, reasoned debate about the value of roadless areas, I ask you to protect our roadless areas, and implement the roadless area policy that was to be the roadless area policy that was to be implemented at the start of this year. (Individual, Missoula, MT - #A17681.12111)

**24. Public Concern: The Forest Service should explain why none of the 10 questions in the Advance Notice of Proposed Rulemaking address inventoried roadless areas as fully functioning ecosystems.**

My first question is: who wrote these questions?

So much of the focus is on local decisionmaking. These roadless areas are in our National Forests. This is a national issue.

The true magic, at least in an ecological sense, is that these inventoried roadless areas represent fully functioning ecosystems. No question directly pertains to this issue. Why is this?

Two questions relate to fire management and private property. The focus on this issue is excessive. It is unfortunate that one of these ten valuable questions was wasted in this manner. (Individual, Walla Walla, WA - #A17698.11100)

**25. Public Concern: The Forest Service should clarify whether the 10 questions in the Advance Notice of Proposed Rulemaking are an attempt to conduct scoping for a new or supplemental EIS.****AND WHETHER PREVIOUS PUBLIC COMMENTS WILL BE CONSIDERED**

We take issue with the Bush Administration adding questions and issues, after the fact, that are outside the scope of the Environmental Impact Statements on the Roadless Policy without conducting a proper NEPA process. Is this scoping for a new or supplemental EIS? Why have our previous comments been ignored? (Organization, Bigfork, MT - #A17742.11100)

**26. The Forest Service should recognize that all of the issues addressed in the 10 questions in the Advance Notice of Proposed Rulemaking were already addressed.**

I support the Roadless Area Conservation Rule just as it is. The questions posed in this new review process have already been answered in the rule to my satisfaction. The vast majority of land in this country is roaded and open to development. The tiny amount that is not should be kept roadless and wild to provide the ecosystem services that only natural wild lands can provide. (Individual, Missoula, MT - #A5609.10150)

None of these issues were left unaddressed in the original rule. It is a waste of my time to have to reiterate my support for this Rule. But I will do so anyway, because I feel a strong commitment to America's future. (Individual, Lewiston, ID - #A29569.10152)

**27. Public Concern: The Forest Service should consider that the 10 questions in the Advance Notice of Proposed Rulemaking are no substitute for the public involvement process.**

It is clear that this current 10 Question Game is an attempt by the Cheney/Bush administration to overturn the Roadless Rule in order to favor their friends in the extractive industries and the ORV crowd for political purposes. It is also in violation of the NEPA regulations, since the major action of reversing the Roadless Rule (or of severely weakening it) requires a long process of public hearings with ample opportunity for all interested citizens to comment. This 10 Question Game is no substitute for the public

process. I am requesting the environmental and legal organization to which I belong to file suit against the USFS for a clear and egregious violation of NEPA. (Individual, Mancos, CO - #A15596.20203)

**28. Public Concern: The Forest Service should eliminate the use of questions to solicit public comment.**

Eliminate the future employment of difficult comment requirements such as these questions. They only serve to confuse and/or discourage potential responders. Majority must rule in the democratic system, and it strongly supports the Roadless Rule as proven by the overwhelming response of the last comment period. Comment periods should remain, but without the impediment of cryptic questions. (Individual, Lafayette, CO - #A26745.15152)

**29. Public Concern: The Forest Service should recognize that the 10 questions in the Advance Notice of Proposed Rulemaking are a positive step toward adequate public involvement.**

You are on the right track with your request for response on the roadless issue rather than the Clinton/Gore process, which everyone knew was a scam. Your questions are thoughtful and if responded to honestly, with real concern for the roadless areas by all the parties, should give you a good basis on which to make your decisions. The process can be considered democratic but it is not a popular vote. You will never get anything close to agreement from all the stakeholders on the roadless question because the views are so polarized and strong. (Individual, Sandy, OR - #A13471.15000)

This questionnaire is a positive step in ensuring that the voice of all Americans can be heard, rather than the shouting voices of a few. (Individual, Atlanta, GA - #A16459.14410)

*Adequacy of Specific Questions*

**30. Public Concern: The Forest Service should recognize that Question 3 in the Advance Notice of Proposed Rulemaking is biased.**

**BECAUSE IT IMPLIES THAT THINNING AND ROAD CONSTRUCTION ARE ESSENTIAL TO FOREST HEALTH**

[Question 3] This question is clearly phrased to suggest that heavy-handed thinning and road construction are essential to the desired forest health and wildfire hazard objectives. This is patently not true. (Individual, Missoula, MT - #A9106.30100)

**BECAUSE IT REFLECTS A LACK OF KNOWLEDGE OF FOREST ECOLOGY**

[Question 3] This question reflects a poor understanding of forest ecology. (Individual, South Royalton, VT - #A22114.11100)

**31. Public Concern: The Forest Service should define “near” as used in Question 4 in the Advance Notice of Proposed Rulemaking.**

How should communities and private property near inventoried roadless areas be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal lands?

Define “near”: how “near” is “near”? (Individual, Leadore, ID - #A28841.35200)

**32. Public Concern: The Forest Service should recognize that Question 4 in the Advance Notice of Proposed Rulemaking is misleading.**

**BECAUSE IT IMPLIES THAT ROADLESS AREAS POSE A FIRE THREAT TO HOMES AND COMMUNITIES**

[Question 4] The wording of this question makes the roadless areas seem like a threat. In most forests, they are so small and remote that they are much less of a threat than the roaded parts of the forest. In most cases they are probably not at the borders of the national forests, so they are not next to homes or communities anyway. (Individual, Northfield, MN - #A22395.11140)

[Question 4] This is a very misleading and poorly worded question which seems to blame roadless areas for the fire threat to private property, when in almost every case it is the already roaded and mismanaged Forest Service lands that need the species and spacing control work to reduce fuel loading and create safer zones where it will be easier to stop fires near private property. (Individual, Olympia, WA - #A20849.11140)

[Q4] First, this question implies that National Forest inventoried roadless areas are prone or somehow at greater risk to natural events such as lightning, insects or disease than roaded National Forest lands or adjacent communities and private lands. Also, this question could easily be turned around: "How should National Forest lands be protected from risks associated with natural events (or individual carelessness) that may occur on adjacent community or private lands?" All property interests, public and private, share equal risk for the occurrence of natural events. Likewise, adjacent owners share a responsibility to prevent or control fire, insect or disease on their respective lands.

Some techniques, such as creating defensible space along property lines and in urban interface zones, can reduce the risk of fire, insect or disease spread. However, to posit this question in a manner that suggests roading somehow reduces the risk of natural events on those lands is ludicrous. (Individual, Lyons, OR - #A13491.35000)

### **33. Public Concern: The Forest Service should address various problems with Question 5 in the Advance Notice of Proposed Rulemaking.**

#### **IT IS OUT OF SCOPE FOR THIS ANALYSIS**

What is the best way to implement the laws that ensure States, tribes, organizations, and private citizens have reasonable access to property they own within inventoried roadless areas?

This question is beyond the scope of this analysis. (Individual, Cave Junction, OR - #A17110.11150)

#### **IT REFLECTS AN INADEQUATE REVIEW OF THE ROADLESS AREA CONSERVATION RULE**

Roadless areas are the same as all other national forest lands with respect to inholder access. Posing this question does not reflect due attention having been paid to the Roadless Area Rule by the one asking it. (Individual, Bigfork, MT - #A17221.11150)

#### **IT RAISES SUSPICIONS THAT MORE IS BEING ADDRESSED THAN REASONABLE ACCESS**

It is not clear why this question is on the list since inholdings already have legal access. It raises suspicions that more is being asked for than reasonable access. (Organization, Anchorage, AK - #A17358.40100)

#### **DEFINE "REASONABLE ACCESS"**

What is the best way to implement the laws that ensure states, tribes, organizations, and private citizens have reasonable access to property they own in inventoried roadless areas?

This question is another straw dog. Define "reasonable access". (Individual, Leadore, ID - #A20898.11150)

### **34. Public Concern: The Forest Service should recognize that Question 6 in the Advance Notice of Proposed Rulemaking should be asked during the National Environmental Policy Act process.**

[Question 6] You are asking a question that will be different then for every area of the country. (Not all communities are the same.) This question must be asked during the NEPA process, not now. (Conservation District, Meeteetse, WY - #A17665.11160)

**35. Public Concern: The Forest Service should clarify whether Question 8 in the Advance Notice of Proposed Rulemaking refers to the designation of additional roadless areas.**

**BEYOND THOSE ALREADY IDENTIFIED IN THE ROADLESS AREA CONSERVATION RULE**

[Question 8] We are not clear whether you refer to the designation of additional roadless areas beyond those already identified in the Roadless Area Rule. (Individual, Deridder, LA - #A28678.11180)

**36. Public Concern: The Forest Service should recognize that Question 8 in the Advance Notice of Proposed Rulemaking is inappropriate for addressing roadless area protection.**

**BECAUSE WILDERNESS DESIGNATION IS OUTSIDE THE SCOPE**

Who, by the way, designed the 10 questions for you? Look at Question 8. We are supposed to be commenting on future rule making for roadless designation, or so I assume. Yet, you throw in the question for us to answer which ties it to wilderness designation. That is like throwing red meat to the wolves. We are not in the wilderness debate. We are supposed to be restricted to "roadless." They are not the same. (Individual, Kalispell, MT - #A27715.11100)

**BECAUSE THE FOREST SERVICE IS ALREADY REQUIRED TO INVENTORY FOR WILDERNESS AREA CANDIDATES DURING THE FOREST PLANNING PROCESS**

[Question 8] This is a moot question. The Forest Service is already required to inventory for candidate wilderness areas in the planning process. (Organization, Moab, UT - #A30528.11180)

**37. Public Concern: The Forest Service should recognize that Question 9 in the Advance Notice of Proposed Rulemaking goes beyond the issue of management of inventoried roadless areas.**

[Question 9] goes well beyond the issue of management of inventoried roadless areas and is the essence of the debate over the purposes for which the National Forests are managed. (Organization, Chantilly, VA - #A3350.13200)

## Chapter 2

# Process, Planning, Policies, and Laws

This chapter includes six main sections: National Forest Management Act, National Environmental Policy Act, Interim Direction, Other Policy Concerns, Appeals and Litigation, and Other Legal Concerns.

## National Forest Management Act

This section includes four subsections: National Rulemaking General, Compliance with the National Forest Management Act, Planning Regulations, and Relationship to Other Plans/Policies.

## National Rulemaking General

### Summary

A number of respondents question the Forest Service's legal authority to issue national regulations which change land allocations in national forests. They believe this is outside the parameters of the National Forest Management Act. Others, however, assert that national rulemaking is entirely consistent with NFMA. According to some respondents, they believe it was Congress's intent in passing NFMA to help the Forest Service make local forest planning decisions based on accurate local information. They also think that NFMA inherently recognizes interests at the local level frustrating the achievement of national needs. Consequently, these respondents ask that programmatic decisions be reserved at a national level with the Secretary of Agriculture bearing the responsibility for assuring that national forest management is consistent with the principles of multiple use and sustained yield.

### **38. Public Concern: The Forest Service should clarify its legal authority to issue national regulations.**

#### **WHICH CHANGE LAND ALLOCATIONS IN ANY NATIONAL FOREST**

We believe the Forest Service lacks the legal authority to issue a national regulation that either changes land allocations in one or more national forest management plan or establishes a land allocation outside the forest planning process prescribed by the national Forest Management Act (NFMA). (Business or Association, Rockville, MD - #A13306.20201)

It would be unlawful for the Forest Service to adopt any similar national level rules which alter a forest plan by changing the allowed land use in roadless areas, but without also amending the governing forest plan.

The July 10 notice suggests that one regulatory option the Forest Service has under consideration is to leave in place temporary some form of rules generally prohibiting road construction and timber harvesting in all inventoried roadless areas, until long-term management decisions are made on a roadless area-by-area basis during revision of each forest plan. 66 Fed. Reg. 35919 the "best way to achieve this objective is to ensure that we protect and sustain roadless values until they can be

appropriately considered through forest planning”. The Forest Service lacks legal authority to adopt a regulatory option which purports to change the forest plan’s decisions on allowable multiple uses in a roadless area without first amending the governing forest plan. (Business or Association, Terra Bella, CA - #A15588.20201)

### **39. Public Concern: The Forest Service should recognize that the Secretary of Agriculture *does* have the legal authority to issue a national roadless rule.**

The first question, which asks “What is the appropriate role of local forest planning as required by NFMA in evaluating protection and management of inventoried roadless areas,” deserves an additional response. While congress clearly intended the NFMA to help the Forest Service make local forest planning decisions based on accurate local information, it also recognized the danger of parochial interests at the local level frustrating the achievement of national needs. Consequently, it reserved to the Secretary of Agriculture the responsibility for assuring that national forest management was fully consistent with the principles of multiple use and sustained yield. This broad statutory authority provides the Secretary with all the authority, and indeed the duty, to adopt a national roadless area conservation rule. See 16 U.S.C. 1607. [Footnote 5: similarly, this statute provided ample authority for the Secretary of Agriculture to exercise discretionary review over the administrative appeals of the 1997 TLMP decision and modify that decision to protect high-value community use areas on the Tongass in the final 1999 TLMP decision.] (Organization, Juneau, AK - #A23091.20201)

The National Forest Management Act and other laws clearly provide authority for executive action through the Secretary of Agriculture. I absolutely oppose further fragmentation of decision-making as proposed by President Bush and others. (Individual, Olympia, WA - #A20844.12110)

NFMA provides that plans may “be amended *in any manner whatsoever* after final adoption after public notice. . . . “Thus, a national role setting forth standards for the protection of Roadless Areas that has the effect of amending local forest plans is fully consistent with NFMA’s procedures. Just as local forest planning must incorporate the effect of other national-level decisions, e.g., congressional wilderness designation, Forest Service Manual and Handbook directives, and national monument designation, so, too, local planning has to accommodate national level policy decisions regarding road building and protection of Roadless Areas. Unless national circumstances change, e.g., road maintenance backlog is eliminated and social preferences for protecting back-country, wildlands are reversed, local forest planning is not the appropriate venue to revisit national roadless policies. (Organization, Sitka, AK - #A12003.20201)

## **Compliance with the National Forest Management Act**

### **Summary**

Respondents encourage the Forest Service to comply with the National Forest Management Act (NFMA). Some assert that compliance is necessary to ensure a fair and open public involvement process. Compliance can be achieved, some suggest, by addressing specific environmental protections mandated by the Act; by providing enough staff and resources in the field to implement forest plans and achieve objectives; or by simply withdrawing the Roadless Area Conservation Rule. Several respondents suggest the Forest Service consider the Senate’s report on NFMA, which stipulates that there should be no national land management prescriptions. Many also stress the need, under NFMA, to hold adequate public meetings (see Chapter 3: Working Together (Question 2): Adequacy of Public Involvement Processes/Methods: *Adequacy of Public Meetings*). Additionally, one of the more common comments is that, per NFMA, decisionmaking must occur at the local (forest planning) level (see Chapter 3: Informed Decisionmaking (Question 1): Local vs. National Decisionmaking: *Local (Forest Level)*)

*Decisionmaking* and Chapter 3: Informed Decisionmaking (Question 1): The Forest Planning Process).

Others suggest that the Forest Service apply NFMA processes to national level decisionmaking. The assertion becomes one of separating site specific, local management and national protection and consistent decision making across all forests.

#### **40. Public Concern: The Forest Service should comply with the National Forest Management Act.**

The NFMA should be knowledgeable about protection of flora and fauna in the roadless areas and make decisions on that basis. (Individual, Metuchen, NJ - #A507.20201)

My comments on this latest iteration of the “roadless area” nonsense will be relatively brief, as my opinion of the whole situation has not changed since Clinton made his initial proclamation in October, 1999. The whole process was, and still is, blatantly illegal, in that it violates NFMA (16 USC 1604 (f)(1)) that calls for one integrated plan dealing with all the uses and resources present on a National Forest, not a separate plan for roadless areas or anything else. It still violates the planning regulations in even the new version of 36CFR219 that requires the management of roadless areas to be dealt with in Forest Plans, not separately (36CFR219.9(b)(8)). It also violates the release language in all the individual State Wilderness Acts that came out of the RARE II process, that state that these areas are available for multiple use management pending revision of Forest Plans. It’s time to comply with existing laws and regulations, and forget this nonsense of dealing with roadless areas outside the Forest Planning process. (Individual, East Kingston, NH - #A4893.20200)

##### **TO ENSURE A FAIR AND OPEN PUBLIC INVOLVEMENT PROCESS**

The most effective, proven tool for working with various groups to ensure that concerns about roadless values are heard and addressed through a fair and open process is the NFMA-mandated forest land and resource management planning process. The Forest Service must allow all interested parties, to offer their views and to help define the issues without being constrained by a pre-established planning format.

Establishing forest-level advisory committees as envisioned by NFMA can strengthen this process. Removing the bureaucratic, straitjacket requirements of the Federal Advisory Committee Act would facilitate this approach. Meaningful, productive relationships evolve from the contacts on the individual National Forests. This is where specifics can best be applied on the ground to work to the benefit of local individuals, the community, the state and the nation. (Individual, Lawrenceville, GA - #A6196.15161)

Legally, the protection and management of inventoried roadless areas can only be addressed through the planning process required by NFMA. In fact, the Clinton Administration’s Roadless Rule violates NFMA by amending the land management plans for the Tongass without following NFMA procedures and without the required local involvement. 16 U.S.C. subsection 1604 (f). Furthermore, the Roadless Rule violates NFMA principles of multiple use and sustained yield (16 U.S.C., subsections 1600, 1602, and 1604). (Ketchikan Gateway Borough, AK - #A17476.20201)

##### **BY ENSURING THAT FOREST PLANS ARE IN COMPLIANCE**

According to the NFMA, the Secretary of Agriculture shall involve the public in the development of management plans. Those plans must be developed, maintained, and revised as necessary for each unit (where “unit” means each National Forest) of the NF System. The plans must provide for multiple use as provided in The Multiple Use Sustained Yield Act of 1960, taking into account the “coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness”. Protection of these resources is paramount and forest plans and revisions must include ways to protect the resources from fire, insect infestation and other types of harm. This would include the construction of roads, if necessary, to abide by this mandate. Maximizing the multiple use aspects of the forest is mentioned numerous times throughout the NFMA, and it is the sole purpose of 16USC532. (Individual, Los Alamos, NM - #A3720.20202)

**BY ADDRESSING SPECIFIC ENVIRONMENTAL PROTECTIONS MANDATED BY THE ACT**

There are numerous issues of scientific concern you refuse to discuss, despite the fact that the 1982 regulations originally mandated forest protections specifically to address watershed protection; protections for endangered species and their habitats; ways to seek removal of species from endangered species list, and that the plan must preserve healthy populations and habitats for larger animals for larger animals such as mammals, birds, and fish. You refuse to support these regulations of the 1982 NFMA. (Individual, Melvindale, MI - #A30286.20201)

**BY PROVIDING ENOUGH STAFF AND RESOURCES IN THE FIELD TO IMPLEMENT FOREST PLANS AND ACHIEVE OBJECTIVES**

*Competing Values and Limited Resources:* There will likely never be full agreement between all the parties interested in the national forests. With a lack of political consensus to change the statutory mission of the national forests, the Forest Service must adhere to the current body of legislation, most importantly to the National Forest Management Act. The Forest Service should re-emphasize local forest-level decisionmaking as the best possible means of achieving desired resource conditions. In addition, the agency should ensure that there are enough staff and resources in the field so that forest plans are implemented and objectives are achieved. (Organization, Rapid City, SD - #A17010.13110)

**BY WITHDRAWING THE ROADLESS AREA CONSERVATION RULE**

NFMA provides that plans may “be amended in any manner whatsoever after final adoption after public notice . . . .” Thus, a national rule setting forth standards for the protection of roadless areas that has the effect of amending local forest plans is fully consistent with NFMA’s procedures. I believe that it can be hard for those who live close to large roadless areas and take them for granted to see their significance in a national and global setting. Thus, I think it is appropriate that a national policy to protect them be created. (Individual, Sitka, AK - #A15506.10150)

I do not support the U.S. Forest Service’s Roadless Initiative in its present form for a variety of reasons. My main point of disagreement is that the roadless initiative appears to be designed to circumvent the National Forest Management Act process of review, and prevents local users of public land, representatives and U.S. Forest managers the opportunity to have reasoned and studied input. Creating 50 to 60 million acres of additional wilderness will mean that nearly 50% of all US National Forest lands are severely restricted and that millions of Americans will be prevented from accessing previously accessible lands. (Individual, Irvine, CA - #A937.10131)

The primary tool for evaluating and establishing management direction for all inventoried roadless areas should continue to be the planning process mandated by the National Forest Management Act (NFMA). This is a time-proven, science-based process that provides an opportunity for people to comment about individual forests and specific areas in those forests. (Individual, Juneau, AK - #A17238.10120)

**UNTIL THE STATUTORY SYSTEM IS MODIFIED**

Until such time that the statutory system is modified, the Forest Service must comply with the planning process as mandated by NFMA. (Individual, Edgewood, NM - #A5638.20201)

**41. Public Concern: The Forest Service should consider the Senate’s report on the National Forest Management Act.**

**WHICH STIPULATED THAT THERE SHOULD BE NO NATIONAL LAND MANAGEMENT PRESCRIPTIONS**

Twenty-five years ago, the National Forest Management Act (NFMA) established forest planning at the local level as the tool by which local people (those most knowledgeable regarding the particular forest) including agency personnel, industry, the environmental community, local government representatives and other interested parties could work together to make decisions regarding the most appropriate use of these public lands. 16 U.S.C. [Sections] 1601-1614. All subsequent resource plans and provisions governing occupancy and use of the lands within a given forest must be consistent with the adopted forest plan, which then guides those activities for a period up to fifteen years. The wisdom of this

localized planning process has not changed, nor have events over the course of time pointed to the necessity for abandoning a local focus in favor of a national rule.

The importance of local knowledge and participation in decisionmaking was highlighted in the Senate Report to the NFMA, when 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” on individual national forests. Further reading of the Senate Report reveals a specific directive to the Forest Service that “there is not to be a national land management prescription.” S. Rep. No 94-893 at 26 (1976) reprinted in 1976 U.S.C.C.A.N.6684, 6685. (Business or Association, Denver, CO - #A20676.20201)

#### **42. Public Concern: The Forest Service should consider that the National Forest Management Act has not prevented development of roadless areas.**

The National Forest Management Act has not prevented relentless consumption of roadless areas by excessive road building and logging. (Individual, Carson City, NV - #A11788.20201)

#### **43. Public Concern: The Forest Service should apply the National Forest Management Act to national-level decisionmaking.**

##### **TO ADDRESS THE DESIRES OF ALL AMERICANS**

The National Forest Management Act (NFMA) needs to be dealt with on a national level. While the concerns of local citizens regarding issues close to home is important, national concerns are important, as well. Many of Wrangell, Alaska’s 2000 plus citizens grew up with and rely on the timber industry, however, their feelings should not out-weigh the sentiments of millions of other Americans. In addition, local Forest Service authorities may be strongly influenced by their friends, neighbors, and other community members. They may be more familiar with physical details and specifics of their managed areas than other United States citizens, but the protection and management of National Forests is a national issue. Furthermore, if local forest planning officials feel that the nation is not informed on their issues, then they should take the initiative to better inform the national public. (Individual, Akron, OH - #A17697.13100)

## **Planning Regulations**

### **Summary**

A number of respondents comment on the relationship between a possible roadless rule and the Planning Regulations. Comments include the suggestion that roadless area regulations be coordinated with the Planning Regulations; that the Roadless Area Conservation Rule be implemented under the former Planning Regulations; and that decisions regarding roadless area management be postponed until completion of the revised Planning Regulations.

Respondents also comment on revision of the Planning Regulations. Some say the Planning Regulations should address management direction of unroaded areas smaller than inventoried roadless areas. Some suggest that ecological sustainability should not be given first priority in planning; rather equal consideration should continue to be given to social, economic, and ecological values. On the other hand, some respondents assert that revisions must not weaken existing environmental safeguards. Additional suggestions include removing the phrase “at the discretion of the decision officer,” including oil and gas leasing decisions and procedures; and removing the objection procedures and retaining existing appeal regulations.

Additionally, there are comments suggesting that the Forest Service should prioritize completion of forest plan revisions once the new Planning Regulations are finalized. Another asserts that the Forest Service should comply with the new Planning Regulations before finalizing the Roadless

Rule because they will provide clear direction in how the agency must carry out local forest planning to ensure the ecological sustainability of roadless areas. Several respondents also request that the Forest Service should seek further public input before taking further actions regarding the Planning Regulations and Roads Policy. Finally, one individual states that the Forest Service should explain why the word “access” was removed from the Code of Federal Regulations (CFR) 212 rule without notifying the public in federal register notices, and should open the CFR 219 rule for full public discourse.

#### **44. Public Concern: The Forest Service should coordinate the roadless area regulations with the Planning Regulations.**

I cannot possibly offer meaningful comments on the validity of conducting roadless area management decision through planning until I clearly understand how “planning” will be conducted once the planning regulations are revised. Therefore, if Roadless Area management decisions are made through forest planning, this rulemaking must be postponed until the Planning Rule changes are finalized. (Individual, Moab, UT - #A15790.14422)

##### **BY EVALUATING THE SOCIAL AND ECONOMIC IMPACTS OF EACH ALTERNATIVE**

The roadless regulations and planning regulations must be coordinated. There must be a comprehensive evaluation of the social and economic impact of each alternative on surrounding communities. This should be based on real data, not models bearing little resemblance to the real communities. (Individual, Boise, ID - #A5165.16120)

#### **THE SECRETARY OF AGRICULTURE SHOULD ELIMINATE THE NATIONAL APPLICATION OF THE CURRENT RULE AND ESTABLISH NATIONAL STANDARDS TO GUIDE THE FOREST PLANNING PROCESS**

There appears to be a conflict between the current rule and the recently revised regulations as 36 CRF Part 219 Guiding the Development of Forest Plans (Nov.9, 2000; 65 FR 67571).

The current rule intent is to provide lasting protection for inventoried roadless areas within the National Forest System in the context of multiple use management.

However, the recently revised regulations guiding the development of Forest Plans provide that during the plan revision process or at other times as deemed appropriate, the responsible official must identify and evaluate inventoried roadless areas and unroaded areas and then determine which, if any, of those areas warrant additional protection and the level of protection to be afforded.

With the current rule in place, the responsible official in the plan revision would not be able to determine which, if any, of the inventoried roadless areas warrant additional protection and the level of protection because of the direction contained in the current rule.

To resolve this conflict, the Sect. Of Agriculture would have to eliminate the National application of the current rule and establish national standards to guide Forest Service officers in applying these standards through the Forest Service Planning Process. (Individual, McMinnville, OR - #A3361.12000)

#### **45. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule under the former Planning Regulations.**

If the Roadless Conservation rule is to be reconsidered and left to local planning, it should be done so under the planning rules that were in place during the development of the original plan, not what is presently in place. (Organization, Huntsville, AL - #A13542.16120)

The process under NFMA using the old (existing) Planning Regulations without the RACR seems to work well. The process should be open . . . and use sound science to guide final decisions. (Individual, Logan, UT - #A13482.20201)

#### **46. Public Concern: The Forest Service should postpone decisions regarding roadless area management until completing the revision of the Planning Regulations.**

In the same Federal register volume notice [Vol. 66, No. 132/Tue. July 10 2001] the Forest Service states: "The Forest Service is committed to protecting and managing roadless areas as an important component of the National Forest System. The best way to achieve this objective is to ensure that we protect and sustain roadless values, until they can be appropriately considered through forest planning." However we are uncertain as to which Forest Planning Regs we will be legally operating under or within, therefore we are unable to interpret much of the language proposed in the Proposed Forest Plan Revision still incomplete.

There are so many interrelated subjects all overlapping it makes commenting impossible.

We can give general comments, but they are meaningless until we have all the final outcomes after all lawsuits have been settled and we are certain which rules will be used and which regulations we will be operating under. (Fire Department, Uinta County, WY - #A15287.14422)

I cannot possibly offer meaningful comments on the validity of conducting Roadless area management decisions through planning until I clearly understand how planning will be conducted once the planning regulations are revised. Therefore, if Roadless Area management decisions are made through forest planning, this rulemaking must be postponed until the Planning Rule changes are finalized. (Individual, Quarryville, PA - #A15217.14422)

The "appropriate role" of the planning procedures required by NFMA is impossible to determine since the planning regulations have been recently revised and then subsequently temporarily withdrawn. It is impossible for the general public to answer this question until the Planning Rule changes are finalized.

Since the primary purpose of any NEPA process is full public disclosure of proposed changes and their impacts on the human environment we would advise the agency to withdraw the rule until the planning regulations are finalized. (Organization, Salt Lake City, UT - #A15263.14422)

#### **PARTICULARLY THE 36 CODE OF FEDERAL REGULATIONS 219 RULE**

Although your present directives (2400-2001-3, 7710-2001-1 and 7710-2001-2) and proposed new rules might alleviate those concerns brought forth by the above mentioned lawsuits, they by no means alleviate those still lurking that were not addressed and are not presently being addressed from future litigation.

Definitions at 219.36 are contradictory to new or reconstructed roads, yet we concern ourselves with 219.35 transition issues. Most publics applaud the move to establish procedure and management direction for "roadless" protection to the forest management and resource planning process without full knowledge of the November 2000, 36 CFR 219 rule as it stands today.

Until the various interests, including forest personnel, have a complete understanding of what 219 states, and inconsistencies in the management rule are remedied, the "Roadless" Area Conservation at 36 CFR [219] should immediately be suspended until the appeal procedure is complete. The forest management rule implementation date should be postponed at that time for the same reason. (Individual, Rock Springs, WY - #A15658.16100)

#### **47. Public Concern: The Forest Service should review and amend the Planning Regulations.**

We feel the best action would be to abandon this effort and put more effort into revising the Planning Regulations and updating the individual forest plan. (Business, Colville, WA - #A3362.16120)

#### **TO ADDRESS THE APPROPRIATE MANAGEMENT DIRECTION FOR UNROADED AREAS**

Scoping for the roadless conservation rule included provisions for identification and development of appropriate management direction of unroaded areas smaller than inventoried roadless areas. This component has dropped from the roadless conservation rule and placed in the planning process. Brief

note of unroaded areas was made in the 2000 revision of the planning regulations. However, these regulations are currently being revised further and it is unclear how the topic of unroaded areas will be integrated into these planning regulations and the implementing language in the Forest Service Manual and Handbook. We advocate attention to the delineation of and appropriate management direction for unroaded areas in the revised planning process. (Individual, Asheville, NC - #A22623.16120)

#### **WITH RESPECT TO EMPHASIS GIVEN TO ECOLOGICAL SUSTAINABILITY AND TO TREATMENT OF UNROADED AREAS**

The new planning regulations developed under the out-going Clinton administration are not an improvement. They need to be reviewed to fix some serious flaws:

A. The change from equal consideration of social, economic and ecological values TO ecological sustainability as the first priority in the management of National Forests is **not good** for quality land stewardship. Determining ecological sustainability is very complex with no hard and fast science on how to make the “call”. This will leave most decisions ripe for litigation where the courts will end up deciding how to best manage natural resources. Itasca County does not support court managed National Forests.

B. Moving the issue of unroaded areas from the Roadless Rule to the new Planning Regulations (late in the process) without any public review and comment is no way to treat constituents and was very likely an illegal move. Unroaded areas are vaguely defined and leave us with unknown impacts when their management is finally resolved.

\*\*A positive aspect of the new planning regs is that there is more emphasis on local government cooperation and the local Forest supervisor is designated as the responsible official/decision maker.

**Decision making at the local level is a good idea.** (Elected Official, Itasca County, MN - #A2561.16120)

#### **WITHOUT WEAKENING EXISTING ENVIRONMENTAL SAFEGUARDS**

It should not revise the forest planning regulations so as to greatly weaken existing environmental safeguards and public participation opportunities in the planning process. (Organization, Oak Ridge, TN - #A12830.16120)

It is disingenuous for the Bush administration to suggest that local forest planning will adequately protect roadless areas. The administration is simultaneously revising the forest planning regulations to greatly weaken existing environmental safeguards of public participation opportunities. There is no reason to believe that roadless areas will be protected by future forest plans any better than they have been in the past. (Individual, Hatboro, PA - #A15489.16120)

#### **BY REMOVING THE PHRASE “AT THE DISCRETION OF THE DECISION OFFICER”**

The new planning regulations need to be revisited to return mandatory coordinated planning with local government to the regulations, removing the “at the discretion of the decision officer” portion. This will greatly aid the Service in meaningful collaborative planning. (Business or Association, Alturas, CA - #A17770.14422)

#### **BY INCLUDING OIL AND GAS LEASING DECISIONS AND PROCEDURES**

Include oil and gas leasing decisions and procedures in the body of the regulations. Make both the 36 CFR 228.102(d) and (e) decisions in the LRMP. (Business, Denver, CO - #A25688.10130)

The final rule published in the Federal Register on November 9, 2000 circumvented the decision making process with respect to where and what level of oil and gas leasing decisions will be made as a part of the planning process. **No reference to leasing is made** in Sections 219.10 Site-Specific Decisions or Authorized Use of Land or 219.26 Identifying and Designating Suitable Uses. Nevertheless, it is critically necessary to include specific direction on how oil and gas leasing is to be integrated into the planning process. To meet the legal requirements of the Mineral Leasing Act, the Energy Security Act and the Federal Onshore Oil and Gas Lease Reform Act, it is essential for direction to be included in the regulations establishing standards for making both the 36 CFR 228 Part 102 (d) and (e) leasing

decisions, availability and specific lands decisions, in the planning process. A key element of the process must be that the FS make both of these decisions during planning to avoid the unnecessary and costly supplemental NEPA (National Environmental Policy Act) documents currently required to make the “specific lands” leasing decision. Furthermore, a discussion of oil and gas resources and how they will be integrated into the forest planning revision and amendment regulations needs to be added to the regulatory preamble as well as the rule itself. (Business, Denver, CO - #A25688.65310)

**BY REMOVING THE OBJECTION PROCEDURES AND RETAINING EXISTING APPEAL REGULATIONS**

Abandon the “pre-decisional objection” procedures and retain existing appeal regulations. (Business, Denver, CO - #A25688.10130)

**48. Public Concern: The Forest Service should prioritize completion of forest plan revisions once the new Planning Regulations are finalized.**

The Forest Service needs to move forward with the development of a realistic revision of the NFMA and the implementation regulations. Upon the completion of the new Planning Regulations, there should be a priority placed on the completion of Forest plan amendments and/or revisions. These amendment/revisions should be done for each individual National Forest although some analysis may be necessary at a larger scale to properly analyze the effects to the ecosystem. I also strongly recommend that future Forest Plans be “ground proofed” as the final step in the planning process. “Ground proofing” is the only way to eliminate the questionable assumptions, gross generalizations, and the subjective values. Future plans must be explicit enough for reasonable people to properly evaluate and understand. (Individual, Colfax, WA - #A5421.13200)

**49. Public Concern: The Forest Service should comply with the 2000 Planning Regulations.**

Though not fully in force until November 2002, the Forest Service must comply with new planning regulations effective November 9, 2000. The regulations provide clear guidance in how the agency must carry out local forest planning to ensure the ecological sustainability of roadless areas. (Individual, Penn Valley, CA - #A12007.20200)

**50. Public Concern: The Forest Service should seek further public input before taking further actions regarding the Planning Regulations and Roads Policy.**

Of great concern to us is that you have allowed the Forest Service to suspend significant parts of both the planning and road management rules in the absence of any public involvement or consideration. We request that the Forest Service seek public input before taking further actions concerning these rules, which are of considerable importance to us all. (United States Senator, Georgia, - #A23325.16110)

Involvement of the public in the planning process is an issue that has been a component of the planning regulations. An aspect that has gotten increased attention in the 2000 planning regulations is the role of the public in developing Forest plans through a collaborative process. This emphasis should be retained as the planning regulations are revised further. (Civic Group, Roanoke, VA - #A1713.16120)

**51. Public Concern: The Forest Service should explain why the word “access” was removed from the Code of Federal Regulations (CFR) 212 rule without notifying the public in federal register notices, and should open the CFR 219 rule for full public discourse.**

Suspend the “roadless rule”, explain to the public why the word “access” was removed from the 212 rule without notifying the public in federal register notices, and open the 219 rule in its entirety for full public discourse. (Individual, Rock springs, WY - #A15658.25200)

## Relationship to Other Plans/Policies

### Summary

Several respondents urge the Forest Service to coordinate roadless area management with local forest plans. As one person points out, that the national forests are more often than not, disconnected areas, that make it difficult to coordinate all different types of direction, such as fire plans and ski resorts, hence close cooperation must be achieved. Other respondents remind the Forest Service that they are obligated to coordinate land management planning with other Federal, State, Tribal and County planning. While another respondent points out that the Agency should be also coordinating the Roadless Rule with the Interior Columbia Basin Ecosystem Management Project planning process.

### **52. Public Concern: The Forest Service should coordinate roadless area management with local forest plans.**

The Forest Service cannot legally enact a rule that changes existing forest plans without going through the process of amending those forest plans. The issue of overriding existing forest plans strikes especially close to home for members of this Association, who spent the better part of 7 years involved in the revision of the Black Hills National Forest plan, only to see the decisions about how to manage Roadless Areas in the Forest changed by the Washington, D.C. Clinton Roadless Rule. (Organization, Rapid City, SD - #A17010.16000)

Fire has been a major issue during these last two summer seasons, and will probably grow in importance in the coming years. The Moose fire has burned to within 4.5 miles of our ski resort and has involved some of the proposed roadless parcels. How can our Flathead Forest management plan implement a comprehensive fire plan with this patchwork of lands? Do they take a "let it burn" approach to these 5,000+ acre parcels, and then try for control/containment on surrounding lands? What is the impact on wildlife, fish, water quality, and air quality both within the roadless parcel and the surrounding areas which may be both public and private? (Permit Holder, Whitefish, MT - #A20669.30410)

The regionalized method to planning allows for local concerns to be incorporated in to the planning effort. Instituting a blanket policy, such as the roadless policy, does not address the concerns Southeast Alaska might express in the Tongass Land Management Plan.

The Tongass Land Management Plan is a flexible and living document designed to change with the times. National mandates, such as the roadless policy, eliminate the public's opportunity to provide meaningful input. (Tribal Association, No Address - #A23324.16100)

### **53. Public Concern: The Forest Service should coordinate land use management with the planning and land use policies of local governments.**

The Forest Planning regulations specify that the responsible officer for making planning decisions, such as the roadless policy, is to undertake a review of the planning and land use policies of local governments and display the results of this review within the environmental impact statement. This coordination with the local land use plans and communities must occur in the initial steps of developing forest land use management programs. (Elected Official, Douglas County, OR - #A11811.14430)

Roadless Proposal is in opposition to County Comprehensive Land Use Plans. We also wish to remind the USFS that by law and policy public land management agencies must recognize and consider County Comprehensive Land Use Plans as they manage public land. These county land use plans are developed through a formal public process including public hearings and legislatively adopted. The documents provide a legal foundation on which lands within the county should be used. All counties in Utah have recently updated their Comprehensive Land Use Plans. Through this process the citizens identified and

prioritized how land should be used. In all cases county citizens identified “access to public land” as their highest priority and number one objective regarding public land issues. We recognized the USFS is not bound by law to follow these county plans and that they only need to be “considered” when making management decisions. (Professional Society, No Address - #A27584.16000)

The debate over the purpose of the national forest extends far beyond management of roadless areas and has been greatly heightened in recent times. This proposal will not answer that question but makes the case for sticking with the existing planning framework as created by NFMA. Reworking the new planning regulations to retain the mandatory coordination with local government will help insure that local involvement remains high. The Service needs to remember that the goal is not planning and collaboration but implementation of management on the ground. (Business or Association, Alturas, CA - #A17770.15160)

It is important to recognize that, along with local forest plans, agencies such as Caltrans, who are responsible for transportation facilities in and through Forest Service lands, prepare and maintain long-range plans for their facilities. These plans must be considered by the Forest Service, so that decisions are not made unilaterally. (State Agency, Sacramento, CA - #A28870.12313)

#### **54. Public Concern: The Forest Service should support the Giant Sequoia National Monument Management Plan.**

The Giant Sequoia National Monument Management Plan should be an obvious necessity, overseen by the Department of Interior and the National Parks System. The U.S. Forest Service, which seemingly should shepherd the forests, has allowed itself to become timber-oriented. So putting thousand-year-old trees under the jurisdiction of that Service which sees no problem in chopping trees down would be as disastrous as dismissing the endangered species list because, say, it’s not important that our children actually see a bald eagle. (Individual, Frazier Park, CA - #A5010.16100)

#### **55. Public Concern: The Forest Service should coordinate roadless area regulations with the Interior Columbia Basin Ecosystem Management Project planning process.**

We are particularly concerned about the application of this roadless review of the lands within the Interior Columbia Basin project area. The counties were repeatedly told that planning for this region was to be ecosystem wide and in collaboration with the counties. While it was envisioned that a collaborative process was being established, the imposition of a new roadless policy without questions as to the integrity of the Interior Columbia Basin planning process. The ICBEMP cannot succeed if it is overridden by a piece-meal approach developed outside the region. The ICBEMP is [not] only an ecosystem strategy it is, and probably most important, a new collaborative approach to forest management that was designed to collaboratively resolve the very issues raised in this proposed rulemaking (i.e. proper treatment of roadless areas, transportation systems, and forest health and recovery). (Elected Official, Douglas County, OR - #A11811.16130)

## National Environmental Policy Act

This section includes two subsections: Compliance with the National Environmental Policy Act and Environmental Analysis Documents.

### Compliance with the National Environmental Policy Act

#### Summary

Respondents state that the Forest Service should comply with the National Environmental Policy Act (NEPA). To that end, individuals suggest the Agency include input from local, state, and federal elected officials; provide accurate, site-specific information about roadless areas to allow informed comment; ensure that the outcome is not predetermined; avoid committing resources such as to prejudice selection of an alternative; or simply withdraw the Roadless Area Conservation Rule. Some respondents, however, assert that NEPA is itself to blame for the Rule. They believe the Forest Service should work toward revising the National Environmental Policy Act (NEPA) process which, they consider to be an ill-conceived rule and is the cause of declining level of timber removal on federal lands.

#### 56. Public Concern: The Forest Service should comply with the National Environmental Policy Act.

In response to your question, the appropriate role of local forest planning regarding the Roadless proposal is to ensure compliance with all laws and regulations. The National Environmental Policy Act (NEPA) and the Council on Environmental quality (CEQ) regulations are the key federal law and regulation. The pending Roadless proposal is under NEPA and its CEQ regulations. Catron County Commission requested last year to be a partner in the Environmental Impact statement process. Unfortunately, Catron County Commission did not receive any response regarding our request pursuant to 40 CFR 1506.2. Hence, the appropriate role of the Forest Service is to follow the rules and procedures of NEPA and CEQ, and request that the State and affected counties be involved, government-to-government, in the environmental analyses and documentation. (Elected Official, Catron County, NM - #A15538.20200)

The best way to work with different groups and different people who want different things is to continue to use the NEPA process, where all participants have a voice. Whatever the process though, it must be regulated by an umbrella of federal environmental laws which are designed to ensure the viability and sustainability of the forest ecosystem and all of its inhabitants. Opinion on roadless management would only be acknowledged if those opinions maintained or promoted the long-term survival of the forest ecosystem. We cannot meet all the desires of all groups, but we must be responsible enough to maintain and improve our natural resource base, and not let it fall victim to short term political favors or unreasonable economic considerations. (Individual, Bozeman, MT - #A5998.20203)

#### BY HOLDING FAIR AND OPEN PUBLIC MEETINGS AND CONSIDERING SUBSTANTIVE WRITTEN COMMENTS

The creation of the Roadless Initiative violated several laws. The ‘public meetings’ were a sham at which those supporting the Rule were given more time and more opportunity to comment. Substantive written comments were evidently disregarded. Inadequate time was allowed for comment. These are all NEPA violations. (Individual, Cedaredge, CO - #A10364.20203)

Many of our local citizens attended the community hearings in Plumas and other counties that were held by the Forest Service. The hearings were called “listening sessions” and we believe that they fell short of NEPA requirements. (Elected Official, Plumas County, CA - #A4846.20203)

**BY INCLUDING INPUT FROM LOCAL, STATE, AND FEDERAL ELECTED OFFICIALS**

I am encouraged by your efforts to solve the problems that the Roadless Area Conservation Rule will cause if implemented as is. This is an example of the NEPA process completed without accurate information or the input of local, State and Federal elected officials. (Business or Association, Alexandria, LA - #A5426.20200)

I am writing to support the Forest Service's efforts to fix the fatal flaws in the Roadless Area Conservation Rule as it now stands. This policy is the product of a deeply-flawed NEPA process, which was conducted without adequate, accurate information about the affected areas, and which ignored significant concerns raised by local, state, and Federal elected officials. (Individual, Buckley, WA - #A704.20203)

This rule is the product of a deeply flawed NEPA process, which was conducted without adequate or accurate information about the affected areas, and is contrary to the agency's legal authority. I agree with U.S. District Judge Edward Lodge's decision that the U.S. Forest Service violated public disclosure requirements before approving the Clinton administration's roadless plan and that the initiative violated the National Environmental Policy Act. (Business or Association, Concord, NH - #A1050.20203)

This rule is the product of a deeply flawed NEPA process, which was conducted without adequate or accurate information about the affected areas, and is contrary to the agency's authority. I agree with US. District Judge Edward Lodge's decision that the U. S. Forest Service violated public disclosure requirements before approving the Clinton administration's roadless plan and that the initiative violated the National Environmental Policy Act.

The rulemaking process ignored substantive concerns raised by local, state, and federal elected officials. For instance, in January 2000 the NH House of Representatives voted overwhelmingly to oppose President Clinton's plan, voting 269-62 to support a resolution opposing President Clinton's action to establish vast roadless areas in the White Mountain National Forest and called up President Clinton to rescind his "roadless" area proposal and allow decisions regarding land allocation to be made through the Forest Planning process. The Democratically-led NH Senate passed the same resolution and Governor Jeanne Shaheen expressed strong opposition to the plan as well. Many New England residents rely upon access to the sustainable timber base on the White Mountain National Forest and have long participated in and supported the collaborative forest planning process as the only legitimate way to make decisions about all aspects of national forest management. (Individual, Cornish, NH - #A1712.20203)

**BY INCORPORATING ACCURATE INFORMATION ABOUT ROADLESS AREAS**

We are pleased to read that the Forest Service is attempting to fix the fatal flaws in the Roadless Conservation Rule. This policy is the result of a poorly conducted NEPA process. It was made without accurate information about the roadless areas. It ignored significant concerns raised by elected officials and the public. (Individual, Boise, ID - #A13385.10120)

**BY ADEQUATELY ANALYZING ALL ISSUES AND CONCERNS IN THE ROADLESS AREA CONSERVATION RULE FINAL EIS**

[The Roadless Area Conservation Rule] violates NEPA by failing to adequately and accurately analyze all issues and concerns in the FEIS. (Professional Society, Anchorage, AK - #A21707.20200)

**BY PROVIDING SITE-SPECIFIC INFORMATION**

How could the public possibly provide comments when the areas to be impacted by the rule were not identified; no information was provided on the location and size of the roadless areas to be studied or on environmental issues or alternatives. The environmental, social, and economic implications of the roadless rulemaking could not be properly analyzed in any environmental impact documents without this information.

The Forest Service must remember that NEPA requires site-specific analysis. In *California v. Bergland*, 483 F. Supp. 465 (E.D. Cal. 1980), *aff'd sub nom.*, *California v. Block*, 690 F.2d 753 (9th Cir. 1982),

the U.S. Court of Appeals for the Ninth Circuit rejected under NEPA, a blanket approach to roadless reviews. In its review of the Forest Service's RARE II program, the court in *Block* held that, "having decided to allocate simultaneously millions of acres of land to nonwilderness use, 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." *Id.* at 765. Indeed, "broad, generic statements neither inform the public of the environmental consequences of action, nor require the agency to take a 'hard look' at environmental factors." 483 F. Supp. at 465 ("site-specific information is especially vital in considering wilderness issues."). The January 12, 2001, rule has the same fatal flaws as noted by the Federal District Court. The Forest Service, in pursuing this ANPR process, should dedicate time and resources to mapping the national forest system to determine exactly what areas are considered roadless, as well as the resources that are located in such areas. (Business or Association, Washington, DC - #A29622.10135)

#### **BY PROVIDING THE PUBLIC WITH ADEQUATE INFORMATION TO ALLOW INFORMED COMMENT**

Binding NEPA regulations require that 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). In the rulemaking process resulting in the January 12 Rule, the Forest Service completely failed to provide the public with adequate information on details of 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. How could the public possibly provide comments when the areas to be impacted by the proposed rule were not identified, and no information was provided on the location and size of the roadless areas to be studied or on environmental issues or alternatives? The environmental, social, and economic implications of the roadless rulemaking could not be properly analyzed in any environmental impact documents without this information. (Business or Association, Spokane, WA - #A17351.10135)

#### **BY ADEQUATELY STUDYING THE ISSUES BEFORE INITIATING POLICIES**

It appears that the intent of NEPA has been badly violated with the current roadless policy as there does not appear to have been a proper study taken before implementation of this policy was made. (Individual, South Royalton, VT - #A13393.20203)

#### **BY ENSURING THAT THE OUTCOME IS NOT PREDETERMINED**

NWMA is obligated to point out that the Forest Service would likely not be engaged in this ANPR process if adequate compliance with NEPA had occurred in developing the January 12 Rule. The Forest Service should learn from its past mistakes. The rulemaking process resulting in the January 12 rule was a rushed process with a predetermined outcome. Decisions were made based on inadequate or incomplete information, and pertinent data were ignored. (Business or Association, Spokane, WA - #A17351.10135)

This rule is inconsistent with the intent of the National Environmental Policy Act, the National Forest Management Act, the Multiple Use Sustained Yield Act, the Organic Administration Act and most other legislation under which the national forests are managed. . . . although some hearings were held, the decision was made to go forward with the roadless area plan long before the hearings were held. For the most part, those who opposed the plan were ignored. Only those who favored the plan were heard. This is contrary to the intent of the National Environmental Policy Act. (Business, No Address - #A17224.20200)

#### **BY NOT COMMITTING RESOURCES SUCH AS TO PREJUDICE SELECTION OF AN ALTERNATIVE**

Under the NEPA regulations an agency can not commit resources prejudicing selection of alternative or otherwise limiting the choice of alternatives before making a final decision. We note that the Forest Service has been closing and obliterating roads with the stated intent to create larger unroaded areas. To ensure that the agency allows for proper review and comment by the public, we suggest that all roadless areas created or enlarged by road closures be identified. (Elected Official, Douglas County, OR - #A11811.45100)

**BY WITHDRAWING THE ROADLESS AREA CONSERVATION RULE**

I was very pleased that the Federal Judge in Idaho recently ruled that there is strong evidence that the Forest Service policy was predetermined and that the agency violated the National Environmental Policy Act. It is my hope that your Administration will agree with the Judge's ruling and seek to withdraw the rule. (Individual, Provo, UT - #A2875.20203)

I am writing to support the Forest Service's efforts to fix the fatal flaws in the Roadless Area Conservation rule as it now stands. This policy is the product of a deeply-flawed NEPA process, which was conducted without adequate, accurate information about the affected areas, and which ignored significant concerns raised by local, State, and Federal elected officials. (Individual, Temple City, CA - #A753.10130)

This letter is in support of the Forest Service's worthwhile efforts to rehabilitate the Roadless Area Conservation Rule (Rule). Shasta County supports the reasoned and reasonable oversight of land uses, on federal land and elsewhere. Sound land use policies are developed through open, deliberative, and participatory processes, as required by the National Environmental Protection Act (NEPA). The Rule's shortcomings can be traced to its hasty enactment, without sufficient opportunities for review, analysis, public input, and refinement. Shasta County supports the Forest Service's efforts to go back and address these critical shortcomings. (Elected Official, Shasta County, CA - #A4943.10130)

**57. Public Concern: The Forest Service should recognize that it is circumventing the National Environmental Policy Act by requiring additional comments after the record of decision was issued for the Roadless Area Conservation Rule.**

I am appalled that the NEPA process is being circumvented and ignored by requiring additional comments after the ROD was completed. (Individual, Lacey, WA - #A27032.20203)

**58. Public Concern: The National Environmental Policy Act should be revised.**

I encourage the Forest Service to work toward revising the National Environmental Policy Act (NEPA) process which has led to this ill-conceived rule and to the continually declining level of timber harvest on federal lands. (Business or Association, Escanaba, MI - #A8364.20203)

## Environmental Analysis Documents

### Summary

**General Comments** – Some respondents state that, in general, management decisions on roadless areas should require environmental assessments rather than EISs, since many of the areas are already roaded. With respect specifically to the Advance Notice of Proposed Rulemaking, however, some suggest that if the Agency believes the prior review was so inadequate as to require additional action, the extent of which is not now known, that an additional environmental review under NEPA should be required. Some believe that if this is not done, it weakens the process and jeopardizes the final Rule. They are also concerned about the possibility of a revised Rule not requiring an EIS before entering Roadless Areas. Respondents wonder how the public would then be involved in these site specific decisions.

**Roadless Area Conservation Rule EIS** – A number of respondents assert that the Roadless Area Conservation Rule Draft EIS was inadequate in a number of ways: it was not sufficiently site-specific and did not consider a sufficient range of alternatives; it failed to adequately discuss environmental and economic impacts; it failed to address meaningful input by affected citizens and parties; and its underlying analysis was insufficient. Additionally, some respondents state that the Final EIS included vital aspects of the policy which were not included in the Draft EIS,

such as restrictions on lands outside of unroaded portions of inventoried roadless areas; thus they believe the public was denied adequate opportunity for comment. Some suggest that the Forest Service should prepare a supplemental Draft EIS; suggestions include quantifying miles of existing roads in inventoried roadless areas and providing maps of roadless areas. Another person states that the Finding of No Significant Impact document, which allowed the roadless initiative to proceed, violated legal requirements for land withdrawals over 5,000 acres.

One individual takes exception to the Agency's claim that "it is difficult, and perhaps infeasible to collect in a short timeframe, on a national scale, the local data needed to produce a sufficient EIS that analyzes all relevant information or that proposes an adequate range of alternatives." This respondent asserts that the Forest Service has 30 years of data regarding EIS implications all over the country and believes the Agency does have a great deal of experience that shows that diminishing roadless areas diminish our forests. Finally, some respondents refer to the alternatives presented in the Draft EIS and offer their preferences.

### *Environmental Analysis Documents General*

#### **59. Public Concern: The Forest Service should require an environmental assessment or EIS before undertaking any significant action.**

##### **RATHER THAN ARBITRARILY PROHIBITING ROAD CONSTRUCTION**

Before any action can be taken that would result in a significant environmental impact, such as the construction of a new road, an environmental assessment (EA) and if necessary an EIS, has to be done. This is the best way to manage projects on our National Forests, taking each situation on its own, rather than arbitrarily prohibiting all road construction. (Organization, Albuquerque, NM - #A8813.15169)

Moreover, at the same time the Bush administration wants to hand the fate of roadless areas to this process, it has proposed weakening the process itself. It wants to make writing an environmental impact statement optional and not required, for example. Now how in the heck is the public supposed to participate in local forest planning if the Forest Service does not provide an EIS to explain the different management options? If the administration really wants local input, it should aggressively uphold and apply the National Environmental Policy Act, instead of trying to avoid and ignore it. (Individual, Boulder, CO - #A20728.20203)

#### **60. Public Concern: The Forest Service should require environmental assessments for roadless areas rather than EISs.**

##### **BECAUSE MANY OF THE AREAS ARE ALREADY ROADED**

Since many of the areas and conditions on the land are already roaded simple EAs not EISs should be all that is necessary. Forest Supervisors need to be able to flatly state that roadless conditions do not exist, or have not existed and the areas are needed for semi-primitive motorized recreation and forest management activities. (Individual, Alturas, CA #A28581.45500)

#### **61. Public Concern: The Forest Service should conduct an additional environmental review under the National Environmental Policy Act.**

##### **IF THE PREVIOUS REVIEW WAS INADEQUATE AS TO REQUIRE ADDITIONAL ACTION**

If the prior review was so inadequate as to require additional action, the extent of which is not now known, an additional environmental review under NEPA should be required. (Individual, Chico, CA - #A17483.20203)

## 62. Public Concern: The Forest Service should prepare another EIS for a revised Roadless Rule.

The National Environmental Policy Act (NEPA) provides an excellent tool for local citizens and governmental officials to provide input into a considered decision on determining the need for and extent of additional “roadless” areas. NEPA requires “site-specific” analysis of the specific major federal actions. It requires that “responsible officials” prepare an adequate Environmental Impact Statement on such actions as the “Roadless Area Conservation” plan that has been proposed. Meaningful input by affected citizens and parties is a “must” for an adequate EIS. Such an EIS was not properly prepared for the rule implemented in January 2001. (Business or Association, Novato, CA - #A17652.20203)

If your roadless proposal is implemented in Alaska, you will eliminate all major uses, except one, backpacking, in a significant portion of the National Forests in Alaska. Such an action by the federal government constitutes a significant environmental impact on the human environment and must be documented in an environmental impact statement in accordance with NEPA, in fact, you are required to document the impacts of this proposal on each individual forest by completing an environmental impact statement for each forest affected by the proposal. (Individual, Eagle River, AK - #A23920.20203)

The NEPA process with scoping meetings, preparation of an EIS, circulation of the document to the public and evaluation of comments followed by decision on the best plan seems like a reasonable approach. (Individual, Las Vegas, NV - #A28178.20203)

### PRIOR TO RELEASING LANDS FOR OTHER MANAGEMENT PURPOSES, AS REQUIRED BY CALIFORNIA V. BLOCK

Since the designation of some lands for roadless protection will also result in other lands being released or designated for other development usage, the draft EIS should discuss the impact and management activities expected on the released lands. This analysis is necessary to comply with the requirements of CALIFORNIA V. BLOCK, 690 F. 2d 753 (9th Cir. 1982) that an EIS is required prior to releasing lands for other management purposes. (Elected Official, Douglas County, OR - #A11811.25000)

### TO FACILITATE WORKING TOGETHER WITH ALL INTERESTED PARTIES

The best way to do this would be to go through a full EIS process, and hold public meetings nationwide and allow all individuals and organizations to comment. *This has already been done, and the results are in.* Any attempt to repeat the NEPA process until the citizenry becomes so jaded with it that people cease to participate makes a mockery of NEPA and our democratic form of government. There is no reason to give states or local communities any greater weight than any other citizen in this process. Since collaborative processes by their very nature exclude large and diverse segments of the public, they should not be used to form public policy. Instead, the full NEPA process, which allows participation by **all** Americans, is the model of choice. (Individual, Laramie, WY - #A10590.10152)

### THAT MEETS PAGE LIMITATIONS

The environmental document should be held to less than 150 pages as specified under Section 1502.7 Page Limits of NEPA. Including volumes of data in the text is confusing to public and makes the document unapproachable to the public. The volumes of data should be taken out of the EIS and put into separate Appendices. The EIS document should be condensed to measurable and quantitative discussions with reference to Appendices as required. The decision-making should be based on the key issues and the key measurable and quantitative impacts associated with those issues. (Organization, Helena, MT - #A13226.20203)

## 63. Public Concern: The Forest Service should employ the programmatic approach to EISs consistently.

The Forest Service is a multiple use agency; to not allow multiple uses on National Forest System (NFS) land should be carefully analyzed and specifically identified. If a programmatic approach and EIS works in this case, why wasn't a programmatic EIS of oil and gas leasing and potential oil and gas

development wells on NFS land used? This inconsistency in NEPA [policy] must be fully explained in the roadless EIS if we continue down this path. (Individual, Missoula, MT - #A30049.20203)

**64. Public Concern: The Forest Service should consider that the Finding of No Significant Impact document, which allowed the roadless initiative to proceed, violated legal requirements for land withdrawals over 5,000 acres.**

**NATIONAL ENVIRONMENTAL POLICY ACT AND FEDERAL LAND POLICY AND MANAGEMENT ACT REQUIREMENTS**

The Roadless Initiative was flawed since its inception. The Finding of no Significant Impact (FONSI), which allowed the Initiative to proceed violated NEPA and FLPMA requirements for land withdrawals over 5,000 acres. (Individual, Cortez, CO - #A9094.45310)

*Roadless Area Conservation Rule EIS*

**65. Public Concern: The Forest Service should address inadequacies in the Roadless Area Conservation Rule Draft EIS.**

**IT FAILED TO SUBSTANTIATE STATEMENTS**

In several areas of the draft EIS, the desire to return the forests to a “pre-European settlement conditions” is described. What are pre-European settlement conditions? How will the conditions be verified?

In the draft EIS, you refer to the “strong public sentiment for protecting roadless areas and the clean water, biological diversity, wildlife habitat, forest health, dispersed recreational opportunities and other public benefits they provide.” How many people does this “strong public sentiment” actually represent? (Organization, Albuquerque, NM - #A8813.10135)

**IT WAS NOT SUFFICIENTLY SITE-SPECIFIC AND DID NOT CONSIDER A SUFFICIENT RANGE OF ALTERNATIVES**

The Ninth Circuit federal court of appeals has held that a prior attempt at “national evaluation of roadless areas categorization was insufficiently site-specific and did not consider a sufficient range of alternatives.” Id. at 35919, citing *California v. Block*, 690 F.2d 753 (9th Cir. 1982). The Federal Register notice of July 10, 2001, for the solicitation of comments for review of the Roadless Rule, further explains the folly of the national guidance approach:

Similarly, with respect to January 12, 2001, rule, it is difficult, and perhaps infeasible to collect in a short timeframe, on a national scale, the local data needed to produce a sufficient EIS that analyzes all relevant information or that proposes an adequate range of alternatives. Moreover, within an extended timeframe, collecting and analyzing the information may unnecessarily duplicate the forest planning process.

66 Fed. Reg. 35919. COHVCO suggests that the Department of Agriculture and Forest Service heed their own advice and abrogate, in its entirety, the Roadless Rule, as a misbegotten and illegal attempt to usurp the legislative function from the Congress and a fruitless endeavor to overlay a broad national policy on a functional and working local forest planning process. (Organization, Denver, CO - #A29624.10139)

**The DEIS does not abide by the National Environmental Policy Act (NEPA).** The DEIS did not explore and objectively evaluate all reasonable alternatives to the proposed action. The DEIS needs to be rewritten to fully evaluate other middle ground alternatives and their economic impacts and compare them to the single alternative being proposed by the USFS. The current DEIS also predetermines the outcome of the final rule. (Business or Association, Juneau, AK - #A23080.10136)

**IT FAILED TO ADEQUATELY DISCUSS ENVIRONMENTAL AND ECONOMIC IMPACTS**

The DEIS was very verbose in talking anti-road philosophy and in taking a negative viewpoint about roads. But the DEIS is very lacking in not talking about any specific negative or positive environmental or economic impacts that will result in Alternative 2, 3, or 4. The DEIS fails to acknowledge those improvements in road building technology that have been developed. There are no specific economic or environmental impacts on the individual Forests or IRAs.

According to NEPA and 40 CFR 1500-08), an EIS is supposed to lay out the best estimates of specific and cumulative impact of both the detrimental and beneficial impacts of alternatives to allow the public to balance the impacts and make a scientifically based decision. But this DEIS has few specific instances of the impacts listed; many impacts are ignored, and the cause and effect analysis of the linkage of the impacts on the way the Forest Service currently builds roads is very weak.

The DEIS will not allow the public to make an informed decision. There is a saying that applies here: If we can't get the facts right, we will get the decisions wrong. The DEIS has failed to elucidate those facts. (Union, No Address - #A28881.10135)

**IT FAILED TO ADDRESS MEANINGFUL INPUT BY AFFECTED CITIZENS AND PARTIES**

We strongly encourage the Forest service to solicit and take serious comments made by local citizens, local, county and state government officials and others to all actions taken by the agency affecting the various forest management plans and areas of jurisdiction under their supervision. Local citizens and officials often "know best" how individual actions on Forest Service lands will affect both the local communities as well as the various resources on the land involved. (Business or Association, Novato, CA - #A17652.15111)

The National Environmental Policy Act (NEPA) provides an excellent tool for local citizens and government officials to provide input into a considered decision on determining the need for an extent of additional "roadless" areas. NEPA requires "site-specific" analysis of the specific major federal actions. It requires that "responsible officials prepare an adequate Environmental Impact Statement on such actions on the "Roadless Area Conservation" plan that has been proposed. Meaningful input by affected citizens and parties is a "must" for an adequate EIS was not properly prepared for the rule implemented in January 2001. (Business or Association, Novato, CA - #A17652.20203)

**ITS UNDERLYING ANALYSIS WAS INSUFFICIENT**

Our review of the Preceding EIS led us to conclude that the underlying analysis upon which these proposed rules were based was insufficient. The minerals and hazards analyses were too superficial for specific commentary. (State Agency, Cheyenne, WY - #A22609.14100)

**66. Public Concern: The Forest Service should consider that the final Roadless Area Conservation Rule includes restrictions on lands outside of unroaded portions of inventoried roadless areas.****RESTRICTIONS WERE NOT INCLUDED IN THE ALTERNATIVES**

We appreciate the opportunity to provide our perspective on RAC through the advanced notice of rulemaking. We were especially disappointed that the final RAC rule included restrictions on lands outside of unroaded portions of inventoried roadless areas (IRAs) since those restrictions were not included in the alternatives offered for public comment and offer the greatest concern for continued access to intermingled state lands. This does little to build trust and the "working together" partnerships the USDA Forest Service says it is seeking. (State Agency, Saint Paul, MN - #A30025.45000)

**67. Public Concern: The Forest Service should consider that the public was not given the opportunity to comment on vital aspects of the Roadless Area Conservation Rule which were added to the Final EIS, but which were not part of the Draft EIS.**

The Forest Service did not give the public opportunity to comment on vital aspects of the Roadless policy that were added into the Final EIS, but not part of the initial analysis done in the Draft EIS. (Business or Association, Washington, DC - #A28689.20203)

When the initial Roadless Area Conservation Rule was announced in January 2001, I couldn't help but feel that the policy developed was a result of a top down approach dictated from Washington without the benefit of input from Americans living in close proximity to the forests managed by the U.S. Forest Service. I base this upon the fact that the FEIS was so radically different from any alternative in the DEIS that it appeared that the DEIS and review was a "smokescreen" to divert attention while the real rule was written. Reopening this rule for additional comment is an important step in remedying this serious oversight by the previous Administration. (Organization, Huntsville, AL - #A13542.10131)

**68. Public Concern: The Forest Service should prepare a supplemental Draft EIS.**

USDA should prepare and circulate a new or supplemental DEIS. The intent behind the new or supplemental DEIS would be to see that the public is fully informed and that all relevant data and information is contained in the DEIS. Maps and diagrams should be specific, detailed, and clear with respect to applicable boundary lines, including IRAs, proposed new roadless areas, areas affected by the Roadless Initiative, management prescriptions within national forests, permit boundaries within national forests. (Permit Holder, Mammoth Lakes, CA - #A21901.14000)

**THAT QUANTIFIES MILES OF EXISTING ROADS IN INVENTORIED ROADLESS AREAS**

If the agency relies upon the environmental analysis done in connection with the final rule issued January 12, 2001, [Footnote 17: 66 Fed. Reg. 3243] it must:

1) Prepare a supplement to the Final Environmental Impact Statement (EIS) which quantifies the miles of roads existing in Inventoried Roadless Areas in order to know the potential for road loss in the event that any or all of these roads require, but are denied, road reconstruction. (Organization, Chesapeake, VA - #A11804.10130)

**THAT PROVIDES MAPS OF ROADLESS AREAS**

Prepare a supplement to the Final EIS, which provides maps of roadless areas that indicate locations of all classified and unclassified roads lying within these roadless areas. (Organization, Chesapeake, VA - #A11804.10135)

**69. Public Concern: The Forest Service should consider that data from the past 30 years of Environmental impact statements is sufficient to analyze the effects of the Roadless Area Conservation Rule.**

It states that "it is difficult, and perhaps infeasible to collect in a short timeframe, on a national scale, the local data needed to produce a sufficient EIS that analyzes all relevant information or that proposes an adequate range of alternatives." The administration has 30 yrs. of data regarding EIS implications all over the country and a great deal of experience that shows that diminishing roadless areas diminishes our forests. It overtly attempts to nullify the EIS by making this statement and again opens the door to special interests. (Individual, Brookport, IL - #A17229.10152)

**70. Public Concern: The Forest Service should adopt Alternative 3D.**

**BECAUSE IT REPRESENTS THE BEST CHARACTERIZATION OF ROADLESS AREA VALUES AND MANAGEMENT PLANNING**

I supported the roadless area conservation proposal and feel that the Prohibition Alternative 3, including stewardship logging and fuel removal and Procedural Alternative D most closely fit my idea of what

roadless areas should be and what the procedure should be for planning at the forest level. Although not as high a concern from the horse use point of view, but because of hunting, fishing and wilderness values, I supported Alternative T3 for the Tongass National Forest. (Individual, Wauconda, WA - #A5442.10150)

**71. Public Concern: The Forest Service should adopt Alternative 4D.**

I support strengthened versions of alternatives 4 (including the Tongass National Forest) and D to prohibit all destructive activities in all roadless areas larger than 1,000 acres. (Individual, Portland, OR - #A17383.45320)

**72. Public Concern: The Forest Service should adopt Alternative T4.**

I believe if you would review a summary of the combined effects not addressed in the EIS for alternative T4 you would conclude it is the least impacting and again could still be reversible in the long term. (Individual, North Little Rock, AR - #A814.10161)

**WHICH EMPHASIZES FRAGILE ECOSYSTEM PROTECTION OVER LOCALLY CONTROLLED DEVELOPMENT**

I take exception, however, to your preferred alternative regarding the Tongass National Forest alternative. I would request that you adopt alternative T4 which emphasizes fragile ecosystem protection over local control development. This would provide a form of population control in an environmentally sensitive area. I also feel that local control will promote oil development regardless of the other elements of the equation. (Individual, North Little Rock, AR - #A814.45623)

## Interim Direction

This section includes two subsections: Interim Direction General and The Interim Directive.

### Interim Direction General

#### Summary

Some respondents suggest that the Forest Service establish interim direction for roadless area management for various reasons. One reason given is the length of time between Forest Plan Revision, 4-6 years and the uncertainty of the Roadless Rule status. These respondents believe there should be guidance during this time period or no work will be done on the ground. There are other individuals who ask that direction goes further than the ten questions in the ANPR and list items such as; all lands originally identified as roadless should be given full interim protection plus progress should be made on identifying new areas.

Some say interim direction should be established for national forests which are revising or have recently revised their forest plans; and some that it should be established to protect areas that cannot be actively managed during the current planning cycle or for smaller areas in forests through project-by-project analysis. Others assert that it should be established in collaboration with other agencies and affected users. Some specifically suggest that it should be established for mining.

On a similar note, respondents also suggest establishing a temporary moratorium on activities in roadless areas—for at least 50 years; for development projects that are inconsistent with the Rule; until litigation has been resolved; until the entire maintenance and reconstruction backlog is eliminated; until a new management policy is developed; or until the Agency determines what type of forestry should be practiced.

Finally, some respondents urge the Forest Service to clarify that the Rule is not now in effect and that roadless areas will continue to be managed according to already existing procedures and classifications.

#### **73. Public Concern: The Forest Service should establish interim direction for roadless area management.**

Unfortunately, forest management planning can often take 4-6 years to complete. While this time frame can be managed in some circumstances, the specter of the Roadless Area Rule (as of January 12, 2001) makes this completely unworkable. The Forest Service must decide and clearly articulate what is expected during the interim period between the flawed Roadless Area Proposal and the amended rule. The most logical outcome is that the status quo is preserved until the new rulemaking can be completed. Areas that were previously designated as inventoried roadless areas that allow road construction and reconstruction, should continue to be managed in that fashion. The Forest Service has no basis on which to pretend that the enjoined rule has been implemented. There areas should continue to be managed in the same fashion as they were prior to the January 12, 2001 rule—local decisions made on a case-by-case basis. (Business, Wright, KY - #A23085.12460)

Should the Forest Service still deem it necessary to reopen discussion of the Roadless Rule, the following issues and concerns should be addressed along with the 10 questions in the ANPR.

All the lands originally identified should be given full interim protection and the process for identifying additional areas should be implemented, until the process is complete. (Business, Spokane, WA - #A22047.12400)

**TO ADDRESS ROADLESS AREA MANAGEMENT FOR NATIONAL FORESTS WHICH ARE REVISING OR HAVE RECENTLY REVISED THEIR FOREST PLANS UNDER THE 1982 PLANNING REGULATIONS**

Some Forests such as the five Southern Appalachian Forests are continuing the revision of their plans under the 1982 planning regulations. These currently have no direction regarding delineation of unroaded areas or the development of appropriate management direction for them in the planning process now underway. We urge you to provide interim direction to address this situation. (Civic Group, Roanoke, VA - #A1713.45000)

The Forest Service is currently moving forward with timber sales and oil and gas leases in roadless areas. There is a long list of pending timber sales and oil and gas leases for roadless areas in Colorado and Wyoming that will likely proceed if the Roadless Rule is not implemented—a stark illustration of the need for a national rule and the inadequacy of depending on forest-by-forest planning to protect roadless areas. Furthermore, we note that, in the interim while the fate of the Roadless Rule is being decided, the three Colorado forests with recently revised plans (i.e., Routt, Rio Grande and Arapaho-Roosevelt NFs) are not even covered by Forest Service Chief Dale Bosworth's August 22nd directive to regional forest managers that would, at the very least, afford protection for roadless areas during this 60-day comment period. (Organization, Denver, CO - #A21367.12440)

**TO PROTECT AREAS THAT CANNOT BE ACTIVELY MANAGED DURING THE CURRENT PLANNING CYCLE**

Recognize that there are areas for fiscal or other reasons, cannot be actively managed during the current planning cycle, protect them and leave their management to future planning. (Individual, Fairfield Glade, TN - #A325.25230)

**FOR SMALLER AREAS IN FORESTS THROUGH PROJECT-BY-PROJECT ANALYSIS**

We should . . . give interim protection to the smaller acreages in forests through project by project analysis as a transition to the forest planning process. (Individual, Bozeman, MT - #A31208.12450)

**IN COLLABORATION WITH OTHER AGENCIES AND AFFECTED USERS**

Interim protections for roadless areas could be put in place while local forestland and resource management plans are updated or amended. Such amendments should be the product of comprehensive collaborative planning with local and state agencies and other affected resource users. Assessments of roadless areas could be part of collaborative wilderness reviews that are conducted in association with the plan amendments. In some cases, better management and maintenance of existing roads, off-highway vehicle management and other measures could protect important values without a wilderness designation. (State Agency, Carson City, NV - #A17669.12400)

**74. Public Concern: The Forest Service should establish interim direction for mining.**

**IN GUNNISON COUNTY**

Discussion of these areas in the Forest Management Planning process is certainly appropriate. Unfortunately, this planning process can take four to six years. In many instances this time frame may be satisfactory, but in the case of the coal mines in Gunnison County the enjoined rule is already impacting the daily operations of the coal mines. There also needs to be a more immediate solution to this problem between now and the time the revised forest management plan is completed. (Elected Official, Gunnison County, CO - #A22061.12400)

**75. Public Concern: The Forest Service should establish a temporary moratorium on activities in roadless areas.**

I also urge the agency to immediately halt all development projects in roadless areas that are inconsistent with the rule. Despite President Bush's pledge to uphold the roadless policy, the Administration

mustered no defense of the plan when it was recently challenged in court. To make matters worse, the Forest Service is moving forward with destructive logging projects in some of the nation's most pristine forests, including Alaska, Oregon, California, and Idaho. For example, logging projects on the Six Rivers National Forest in northern California and on the Tongass National Forest in Alaska threaten roadless areas, imperiled fish and wildlife, and scenic and recreational values. It is fair to ask then, why as the Service asks for more input and as the President expresses his commitment to conserving wild forests—the agency is preparing and implementing logging projects in roadless areas? (Individual, Napa, CA - #A1037.12440)

#### **FOR AT LEAST 50 YEARS**

It is my professional opinion based upon my career as a logging engineer/forester with the USFS in Alaska, Montana and Idaho that the remaining biologically productive unaltered areas throughout the National Forest System, especially the Tongass should have a development moratorium of at least fifty years, the Roadless Rule of January 2001 best accomplishes this. (Individual, Sitka, AK - #A1056.12440)

#### **FOR DEVELOPMENT PROJECTS THAT ARE INCONSISTENT WITH THE ROADLESS AREA CONSERVATION RULE**

I write to support the Forest Service Roadless Area Conservation Rule and to respond to your intentions to amend this balanced approach to forest conservation. I urge the agency to immediately halt all development projects in roadless areas that are inconsistent with the rule. (Individual, Buckley, WA - #A5962.10150)

#### **WHILE THE MATTER IS BEING LITIGATED**

We believe this ANPR is a waste of time and taxpayers' precious resources. The health of our national forests and the will of the American populace would be better served if the FS recommends the following with respect to the IRAS:

Declare a complete and strict moratorium on further road building and material extraction like logging, grazing and mining, while this matter is being fought in our judicial system. While these very words are being written, new roads are being laid on the IRAS, and mature old growth trees are being felled in Alaska, California, Oregon and Utah. The protection and management of "Roadless values" cannot happen in this scenario. (Organization, Seattle, WA - #A11782.12440)

#### **UNTIL THE ENTIRE MAINTENANCE AND RECONSTRUCTION BACKLOG IS ELIMINATED**

Other Concerns. On December 17, 1999, I commented by e-mail on National Forest System Roadless Areas. I suggested that the Forest Service establish a temporary moratorium (rather than complete prohibition) on activities within the current roadless areas until such time that the Forest Service completely eliminates its entire maintenance and reconstruction backlog. In essence, this would result in a total rehabilitation of all degraded lands including erosion control, weed control and reforestation. It would put pressure on the Forest Service and Congress to provide funds to accomplish this enormous job. Then, and only then, would the Forest Service be permitted to make carefully planned entries through the Forest Planning process into the present roadless areas.

I still think this is a reasonable approach and will again offer it as a suggestion to improve environmental conditions on all National Forest lands. (Individual, Salmon, ID - #A8830.12400)

#### **UNTIL A NEW MANAGEMENT POLICY IS DEVELOPED**

I would like the Forest Service to immediately call for a moratorium on all commercial exploitation and development of roadless areas in our National Forests. This moratorium should be in place until we can develop a new policy on what constitutes responsible forestry. If I could have my wish, I would have that moratorium applied to all National Forest lands! (Individual, Washington, DC - #A27348.12440)

#### **UNTIL THE AGENCY DETERMINES WHAT TYPE OF FORESTRY SHOULD BE PRACTICED**

The Roadless Initiative presents us with a unique opportunity to address the central question at the heart of all the disputes that have mired the Forest Service in the past: What type of forestry should we practice? This question can initially be posed in the context of the roadless areas, but can and should be expanded to the entire National Forest system. Until we do that, we should act according to the

precautionary principle and institute an immediate moratorium. (Individual, Washington, DC - #A27348.12440)

**76. Public Concern: The Forest Service should clarify that the Roadless Area Conservation Rule is not in effect and that the lands will be managed according to already existing procedures and classifications.**

Clarify that during this new rulemaking period that the enjoined Roadless Area Rule (January 12, 2001) is not in effect and that the lands will be managed according to procedures and classifications in effect prior to that time. (Business, Wright, WY - #A23085.45500)

## **The Interim Directive**

### **Summary**

According to some respondents, the Forest Service should make the Interim Directive effective until forest plans are revised; some say it should be strengthened to prevent any further loss of the roadless area base. One group asserts that it would essentially return land management to its prior state by leaving the fate of roadless areas to the forest planning process. On the other hand, one business states that it is essentially an implementation of the Roadless Area Conservation Rule, and thus violates the district court ruling.

**77. Public Concern: The Forest Service should make the Interim Directive permanent.**

**UNTIL FOREST PLANS ARE REVISED**

We urge you to make permanent the interim directive dated June 6, 2001. This directive clarifies the scope of local authority to make decisions in inventoried roadless areas until Forest plans are revised. (Civic Group, Roanoke, VA - #A1713.12400)

**78. Public Concern: The Forest Service should strengthen existing interim protection of roadless areas.**

**TO PREVENT ANY FURTHER LOSS OF THE ROADLESS AREA BASE**

Our National Forest Roadless Resource is a precious one that continues to grow smaller as development activities disqualify areas from the roadless inventory. Only under the most exceptional circumstances should development activities be allowed in our roadless areas and only under the authority of the Chief. The interim protections now in place are insufficient and full of exceptions. They should be strengthened. As the U.S.F.S. takes more time to come to grips with the roadless issue, it is imperative that the finite roadless base be undiminished. This should include all National Forests including the Tongass and regardless of the status of management plans, revisions or supplements. (Organization, Cave Junction, OR - #A17235.12450)

**BY ADOPTING THE ROADLESS AREA CONSERVATION RULE UNTIL FEDERAL OFFICERS ARE CONVINCED OF ITS NEED**

Please push for the adoption of the Roadless Rule! At least for some interim period until federal officers are convinced of absolute need! (Individual, Meeker, CO - #A6184.12400)

**79. Public Concern: The Forest Service should consider that the Interim Directive would return land management to its prior state.**

**BY LEAVING THE FATE OF ROADLESS AREAS TO THE FOREST PLANNING PROCESS**

We are troubled by the Interim Directive on the Roadless Rule, which essentially returns us to the situation that existed prior to the creation of the Roadless Rule, that is, with the fate of roadless areas being left to the forest planning process. (Organization, Washington, DC - #A18031.12400)

**80. Public Concern: The Forest Service should recognize that the interim direction outlined in the June 7, 2001, memo to staff is an implementation of the Roadless Area Conservation Rule.**

**WHICH IS A VIOLATION OF THE DISTRICT COURT RULING**

I have recently reviewed a copy of your letter of June 7, 2001 to the Regional Foresters, Station directors, Area Directors, and WO Staff. This letter, in effect stops all planned actions within existing Inventoried Roadless Areas by reserving to yourself the decision authority for timber harvest and road construction.

I, and my clients, are interested in your response to the following comments . . . :

Although you could argue that your action does not, in effect, stop activities within inventoried areas, it is clear to us that in the real world of Forest Service operations this action has the same effect as the Roadless Area Conservation Rule of May 12, 2001. Why shouldn't we consider this an implementation action of the above Rule which is a violation of the District Court Ruling? (Business, Colville, WA - #A2593.12400)

## Other Policy Concerns

This section includes two subsections: Other Policy Concerns General and Other Policy Concerns – Specific Policies.

### Other Policy Concerns General

#### Summary

Foremost among general policy comments is the comment that the Forest Service should evaluate the cumulative effects of multiple management proposals and policies. Suggested proposals and policies to evaluate include the Roadless Area Conservation Rule, the Planning Regulations, and the Roads Policy; and other withdrawals of National Forest System lands; multiple use mandates, and the fire plan, etc. Likewise, respondents ask the Forest Service to address related policies and regulations concurrently, in order to understand the cumulative impacts of these proposals. They believe a piecemeal approach will create additional confusion and will never get to the heart of the issues associated with the Roadless Actions. One individual requests that the Forest Service withdraw the Roadless Initiative, the revised Transportation Plan and the revised Forest Planning Rules and work towards a “fair use plan”. In particular, people wonder how the roadless rule and the topic of unroaded areas will be integrated into the Planning Regulations and the Forest Service Manual and Handbook.

#### **81. Public Concern: The Forest Service should evaluate the cumulative effects of multiple management proposals.**

##### **THE ROADLESS AREA CONSERVATION RULE, THE PLANNING REGULATIONS, AND THE ROADS POLICY**

The Forest Service must address the cumulative impact of three related, yet uncoordinated rulemakings, regarding Planning, Inventoried Roadless Area Management, and the Forest Transportation System. (Individual, Des Moines, IA - #A12587.16100)

##### **THE ROADLESS AREA CONSERVATION RULE AND OTHER WITHDRAWALS OF NATIONAL FOREST SYSTEM LANDS**

**The DEIS fails to adequately consider cumulative impacts.** The CEQ regulations specify that direct, indirect and cumulative impacts, both adverse and beneficial, must be considered in a NEPA analysis. The USFS has not considered the cumulative impacts of the various USFS pending environmental initiatives. There is no recognition at all of the cumulative impact of the proposed Roadless Areas program with other withdrawals of National Forest Lands including those for wilderness areas, wild and scenic river areas, Forest Service natural areas, and others. (Business or Association, Juneau, AK - #A23080.10141)

##### **THE ROADLESS AREA CONSERVATION RULE, MULTIPLE USE MANDATES, AND THE FIRE PLAN, ETC.**

Over-arching policies such as multiple use, the fire plan, etc. must be clearly described and their interrelationships and mandates impacting the roadless proposal must be clearly stated. This will permit an evaluation by interested parties as to the strength of the justifications used to rationalize local and regional decisions with national policies. (Business or Association, Sacramento, CA - #A15787.16000)

## **82. Public Concern: The Forest Service should concurrently address related policies and regulations.**

### **THE ROADLESS AREA CONSERVATION RULE, PLANNING REGULATIONS, AND ROAD MANAGEMENT POLICIES**

The United States Forest Service (USFS) has issued three Interim Directives related to National Forest management and the transportation system. The USFS has now requested comments regarding those interim directives (*see* Volume 66, Number 163, pp. 44111-44114; and Volume 66, Number 165, pp. 44590-44591). The first two interim directives related to “approval of activities in roadless areas—one to Forest Service Manual (FSM) 2400 Chapter Zero Code, which covers timber harvest decisions, and another to FSM Chapter 7710, which governs decisions on road construction and reconstruction in roadless areas [the Transportation Policy].” 66 F.R. 163, 44112. The third interim directive relates to the Road Management Rule and portions of the Forest Service Manual associated with forest-scale roads analyses. *See* 66 F.R. 165, 44590. The interim directives and the ten questions . . . are interrelated and interdependent. For those reasons, the State of Wyoming believes that all of these matters and issues should be addressed concurrently using one comprehensive process that will allow the States and the impacted parties to fully assess the cumulative impact of the Roadless initiative, Planning Regulations, Transportation Policy, and Road Management Rule. A piecemeal approach will only create additional confusion and will never get to the heart of the issues associated with the Roadless Actions. (State Agency, Cheyenne, WY - #A22608.10120)

## **83. Public Concern: The Forest Service should withdraw the Roadless Area Conservation Rule, the revised Roads Policy, and the revised Planning Regulations.**

Please withdraw the Roadless Initiative, the revised Transportation Plan and the revised Forest Planning Rules and work with all involved for a fair use plan. (Individual, Buckley, WA - #A6702.10130)

## **84. Public Concern: The Forest Service should clarify how the topic of unroaded areas will be integrated into the Planning Regulations and the Forest Service Manual and Handbook.**

In initial scoping for the roadless conservation rule, a key component of the proposed rule was identification and development of appropriate management direction of unroaded areas smaller than inventoried roadless areas. This component has been dropped from the roadless conservation rule and placed in the planning process. Brief note of unroaded areas was made in the 2000 revision of the planning regulations. However, these regulations are currently being revised further and it is unclear how the topic of unroaded areas will be integrated into these planning regulations and the implementing language in the Forest Service Manual and Handbook. We advocate attention to the delineation of and appropriate management direction for unroaded areas in the revised planning process. (Civic Group, Roanoke, VA - #A1713.45000)

## **Other Policy and Project Concerns – Specific Policies**

### **Summary**

Some respondents suggest that the Forest Service should review its own manual. According to one, roadless area management is already laid out in the Forest Service Manual, section 7703.1. Another respondent suggests the Forest Service coordinate review of the Roadless Area Conservation Rule with review of the Forest Service Manual 7710 revision because they have complementary direction.

The other specific policy most often mentioned is the Roads Policy. Some simply ask that the Forest Service support the Roads Policy. Several respondents, however, suggest the Forest

Service address the cumulative effects of the Roads Policy in combination with the Roadless Rule. Likewise, one individual suggests the Agency inform the public regarding the impact of the Roads Policy on management of inventoried roadless areas. Others assert that the Forest Service should coordinate the Roads Policy with the Rule, and that roadless area management should be decided only after completion of the Roads analysis. These respondent is would be helpful to have a clear definition of roads and road policies before revisiting the Roadless Inventory issue.

### *Forest Service Manual*

#### **85. Public Concern: The Forest Service should consult the 7703.1 Forest Service Manual for roadless area management direction.**

Roadless area management direction is specifically laid out for the FS in Forest Service Manual 7703.1, "Make road construction and reconstruction decisions locally, with public involvement and based on thorough analysis considering the latest scientific information on the adverse effects of roads on ecosystems." (State Agency, Las Cruces, NM - #A18061.20500)

#### **86. Public Concern: The Forest Service should coordinate review of the Roadless Area Conservation Rule with review of the Forest Service Manual 7710 revision.**

##### **BECAUSE THEY HAVE COMPLEMENTARY DIRECTION**

Your review of the roadless rule should coincide with reexamination of the manual policy governing road management (FSM 7710), which was recently put in place. This policy reversed or seriously constrained the management decisions in many forest plans and their extensive public involvement. The roadless rule and the FSM 7710 revision have complementary direction.

Changing only one of them will result in ambiguous direction. The road policy, which precludes all road construction and most road maintenance in uninventoried roadless areas, irrespective of size or shape, preempts any land management decision in forest plans that would require constructing and maintaining a road system in these areas. The road policy effectively would drive the land management decisions—a perversion not only of NFMA but also of fundamental management principles. (Individual, Lawrenceville, GA - #A6196.16000)

### *Quincy Library Group*

#### **87. Public Concern: The Forest Service should support the Quincy Library Group legislation.**

Though the QLG land base classification will sunset with the term of the pilot project, considerable acreage of productive forest lands are not being rehabilitated or reforested. The ultimate resolution to the classification of the various unroaded areas will hopefully be resolved through local participation in the land management revision process. The QLG legislation directs the three forests to commence the appropriate forest revisions within two years of the signing of the Act and I urge your support of that effort. If the national environmental crisis industry desires to dictate the management policies for a particular parcel of land in one of the affected eight counties, then let them come to the community meetings and express their opinions like the rest of us. (Professional Society, Chico, CA - #A29719.16100)

## Recreation Agenda

### **88. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule conforms to the Recreation Agenda.**

The roadless rule also conforms to the tenets outlined in the Forest Service's Recreation Agenda, released less than one year ago. The Agenda highlights the need to maintain the integrity of the landscape setting and protect natural character for ecological sustainability and the recreation experience. (Organization, Silver Spring, MD - #A13495.16000)

## Roads Policy

### **89. Public Concern: The Forest Service should support the Roads Policy.**

I am writing to express my full support for the three primary actions identified in the proposed road management strategy. This type of management approach will allow the Forest Service to retire the most environmentally damaging roads and at the same time allow the public better access to our national forests with better constructed and maintained roads. (Individual, Mount Shasta, CA - #A8360.10157)

### **90. Public Concern: The Forest Service should consider the cumulative effects of the Roads Policy in combination with the Roadless Area Conservation Rule.**

When combined with the Forest Service transportation policy that limits the amount of roads in the national forests, this rule creates a minimalist road system that cannot adequately respond to changing transportation needs. (Individual, Eagle, ID - #A17754.16110)

When this initiative is combined with the new transportation policy, it creates a permanently shrunken road system at a time when Forest Service data indicates the most popular use on service land is recreational driving (and it's increasing rapidly). (Business or Association, Alturas, CA - #A17770.30200)

### **91. Public Concern: The Forest Service should inform the public regarding the impact of the Roads Policy on management of inventoried roadless areas.**

It is important for the public to be given information by the agency on the impact that conformance with the Roads Policy will have on management decisions made for Inventoried Roadless Areas. (Individual, Moab, UT - #A15790.14120)

### **92. Public Concern: The Forest Service should coordinate the Roads Policy with the Roadless Area Conservation Rule.**

#### **Clearwater National Forest:**

#### **North Fork Country**

Closure of a few, unnecessary dirt roads could unite the large roadless areas in the North Fork into one whole of over 1,000,000 acres. These areas should be prioritized for obliteration as the roadless policy and the roads policy work together at restoring the destruction that has taken place on our national forests. (Organization, Moscow, ID - #A22654.16110)

It is believed that the proposed Roads Policy will have an impact on the availability of recreation opportunities, but is unclear how the roads and roadless policies will interact. In reevaluating the Roadless Area Conservation Rule the Forest Service must consider the context of other recent initiatives such as the Roads Policy. The Forest Service should present an overview that explains the interaction of the separate regulatory acts. (Individual, Victoria, KS - #A2874.16110)

### **93. Public Concern: The Forest Service should decide roadless area management only after completion of the Roads Policy.**

The primary characteristic that should be evaluated is whether or not roads exist in the so-called roadless areas. It is inconceivable that the roadless area initiative would go forward when the definition and standards for roads, road construction and maintenance are being reviewed. The Road Rules will not even be out for public review until 2002. How can one determine what constitutes a roadless area and propose management of roadless areas when the definition and rules for roads has not been finalized. The first step should be to complete the Road Rules and then revisit the roadless areas to determine whether the definition still fits. (Organization, Murphy, ID - #A18024.45200)

The entire inventoried roadless area should be shelved and reviewed only when the Road Rules have been completed and a determination can be made as to whether the inventoried area even conforms to the definitions to be developed in the Road Rule. . . . The roadless inventory is now more than 20 years old. The USFS is currently in the process of developing new rules for roads including definitions, construction standards and reconstruction standards etc. The process is operating backwards by trying to establish designated roadless areas and determine the management of those areas without first completing the Road Rules. The USFS should complete the Road Rules, consider public input as to road definitions and then re-visit the roadless areas to determine their status with regard to the new definitions. If the roadless areas are finalized with specific dictated management schemes, it will be meaningless for the public to participate in the Road Rules. Alternatively, the Road Rules may change to the point that current roadless areas would no longer qualify but would already be anchored to a roadless management scheme. (Organization, Murphy, ID - #A18024.14421)

## *Sierra Nevada Framework*

### **94. Public Concern: The Forest Service should support the Sierra Nevada Framework decision.**

As elected officials concerned about the Sierra Nevada region from various counties throughout California, we are writing to urge your continued support of the Sierra Nevada Framework Decision. The national forests are an important part of our public lands legacy that should be managed wisely for the benefit of this and future generations.

We believe that the recent Sierra Nevada Framework provides a comprehensive, scientifically sound and balanced approach to addressing the region's priorities. Our constituents, both urban and rural, rely on national forests for a number of benefits including clean water and air, wildlife, plants, recreation, community safety, sustainable timber production, and the region's high quality of life.

Due to past forest management practices, there are thousands of acres in the Sierra Nevada that now have forest conditions that heighten the risk of catastrophic wild fires. We support the Framework's strategic focus on reducing the small trees, brush, and ground fuels that contribute to wild fire risk.

We also support the Framework's protection of tourism and recreation which are the main economic engines of the Sierra Nevada. Over a ten-year frame, the Framework Decision will support more than 137,000 jobs based upon recreation spending. The amount of wages paid in recreation-related employment is estimated at \$2.66 billion (in 1997 dollars).

For the first time, the Framework establishes a comprehensive aquatic and riparian habitat conservation strategy which includes riparian buffer zones and special protection for critical areas near streams, meadows and lakes. We are very interested in maintaining a healthy ecosystem to support wildlife and to help ensure a continuing supply of clean water for the many beneficial uses for the people of California.

We strongly urge you to support the Sierra Nevada Framework as it stands. Revision of this decision could diminish the forests, watersheds and Sierra communities that rely on them. It is time to move away from past conflict and embrace the Forest Service decision as a positive step forward for all Californians. (Elected Official, Placer County, CA - #A12069.16000)

*Other*

**95. Public Concern: The Forest Service should incorporate rulemaking 65 FR 11680m 11682 into future planning efforts.**

**WITH RESPECT TO THE REQUIREMENT TO CONSULT WITH AFFECTED STATE, TRIBAL, AND LOCAL GOVERNMENTS IN IDENTIFYING TRANSPORTATION NEEDS**

The Proposed Rules failed to incorporate the requirement for “consultation with affected State, tribal, and local governments in identifying transportation needs” as set forth in the companion rulemaking (65 FR 11680m 11682). We suggest that in any future planning efforts that this consulting provision be closely followed. (Elected Official, Douglas County, OR - #A11811.15000)

**96. Public Concern: The Forest Service should manage the forests with the pre-1994 direction.**

The only acceptable choice for your multiple-choice initiative is Alternative A. Do Nothing. Please with draw your environmental takeover rule and get back to managing the Federal Forests and Forestland with the pre 1994 policy. (Individual, Salmon, ID - #A22536.10130)

## Appeals and Litigation

This section includes two subsections: Appeals and Litigation General and Appeals and Litigation – Specific Cases.

### Appeals and Litigation General

#### Summary

Respondents assert that endless appeals are interfering with forest management and preventing the implementation of plans which were themselves years in the making. People suggest that time limitations be imposed on the appeals process and that litigants be required to submit to arbitration before their cases can proceed to court. Some suggest that the Forest Service should not make settlement agreements with groups who bring ‘citizen lawsuits’ to curtail activities. One individual suggests employing a land-use clearing house, an ombudsman to sort out the issues before it goes to court.

#### **97. Public Concern: The appeals process should be limited.**

District Rangers and Forest Service Supervisors must be empowered to make decisions affecting National Forests. There should be one level of administrative appeal to decisions and no appeal should go higher than the Regional Forester level. Administrative appeals should be addressed promptly to avoid unnecessary delays. Appeals taken to the judicial level should be bonded and the appellant should be required to pay financial damages that result from frivolous appeals. Financial damages should include administrative costs by the federal government and costs incurred by third parties affected by the appeal. (Governor, State of South Dakota, - #A23354.12125)

#### **REGARDING IMPLEMENTATION OF NEW POLICIES AT THE LOCAL LEVEL**

The current processes of redress of Forest Service decisions (appeals and litigation) needs a major overhaul or special provisions made for policy related to roadless areas (Q10). I suspect that any policy changes that this process results in that are different from the protections provided by the last administration’s proposal will be vigorously challenged through the legal system. This is acceptable and necessary on a national scale. Endless appeals and litigation of every decision to implement new policy on the local level by extremists on either side of the issue needs to have limits. The gridlock over activities we are experiencing today and the repeated hardships imposed on rural western communities (near to where most of the “roadless areas” are located) by current administrative/legal review processes is not beneficial to the people of this nation. (Individual, Challis, ID - #A28346.10139)

#### **REQUIRE LITIGANTS TO SUBMIT TO ARBITRATION BEFORE THEIR CASES CAN PROCEED TO COURT**

I get really frustrated by law suits that are meant to tie up money, land and personal over picky little things.

I think that such suits should go to arbitration first before they end up in court. Let a judge determine if the case merits a trial, leave room for an appeal, then let it go to court if it makes it that far.

Too many special interest groups are abusing the system to get what they want at great cost to public interests. (Individual, Centerfield, UT - #A27645.10139)

#### **RESTRICT LITIGATION TO ENTIRE MANAGEMENT PLANS, NOT INDIVIDUAL SALES OR ASPECTS THEREOF**

Lawsuits by environmental groups need to be curtailed or contained somehow. When every sale or 80% of all sales are taken to court, it is an abuse of the power to litigate. I suggest that the management plan for the whole be challengeable, but not each individual sale or aspect. Perhaps have the forest service present a year’s plan as a whole. If they wanted to challenge the proposed sales they would have to show the whole plan to be flawed, not the pieces, and not just flawed possibly, but hard science to show that

the plan would cause significant irreparable harm to the forest. The possibility of harm should not be cause to prevent public use of the resource. (Individual, Boseman, MT - #A59.20000)

**98. Public Concern: Time limitations should be imposed on litigation.**

Limitation should be placed on the time required to settle a lawsuit, this may require an act of Congress to establish or pay local judges to adjudicate matters on a rapid timetable. Taxpayers should be freed from payment for any lawsuit and the cost associated therefrom should be borne by the parties involved, i.e., if the forest Service is being sued, and they lose the lawsuit, the cost thereof awarded by the judge should come from the Forest Service already approved budget and lawsuits should not be part of an approved budget. (Individual, Kalispell, MT - #A3380.12000)

**99. Public Concern: The Forest Service should not allow litigation to sidetrack the legitimate forest planning process as defined by the National Forest Management Act.**

The appropriate role of forest planning in resolving the roadless issue was well defined in settlements of RARE II lawsuits. Unfortunately, attempts to resolve the issue through forest planning as defined by the National Forest Management Act of 1976 have failed due to the appeal process and lawsuits. The forest planning process should be allowed to work as intended by the 1976 act. IWIT has invested considerable effort in the forest planning process only to see forest plans not implemented because of the effort of outside groups. (Business or Association, Moscow, ID - #A5428.20201)

**100. Public Concern: The Forest Service should not make settlement agreements with groups who bring 'citizen lawsuits' to curtail activities.**

On the Shawnee NF in Southern Illinois, the residents were dependent on recreation and tourism using trails into the Shawnee. Alleging "trail erosion" conservation groups were successful in closing trails into half of the areas used by customers and clients of the local residents. Grapefruit-sized stones were placed on the horse-trails to make sure horses could [not] use them. Even hiking was prohibited. This sort of closure is totally inappropriate. They nearly destroyed the tourist-dependent businesses. In "citizens lawsuits" to close national forests, the FS should not make "settlement agreements" with those groups. They should force the issue into higher courts on the basis of Acts of Congress. Congress never intended for these abuses to take place by closing the national forests to public use. (Organization, Three Rivers, CA - #A28739.90410)

**101. Public Concern: The Forest Service should develop a land-use clearinghouse to sort out issues before litigation.**

The Departments of Agriculture and Interior should not have to go to court to defend every decision they make. You guys are overworked and the courts are overworked. What this country needs is a land-use clearing house, an ombudsman, someone or something, to sort out the issues before it goes to court. And those decisions should be based on a realistic, non-political point of view that prioritizes, and re-prioritizes, the current needs of the country. (Individual, No Address - #A8879.15160)

**102. Public Concern: The Forest Service should not allow Environmental Protection Agency data in court.**

**AS IT POINTS TO A LACK OF DUE PROCESS**

In no way should EPA studies be allowed as data in court, this points to a lack of due process. We need to allow the people of the United States of America the chance to life, liberty and happiness. Please allow the citizens to make these joint decisions by working with the Forest Service and BLM. (Individual, Sandy, UT - #A6747.15110)

## Appeals and Litigation – Specific Cases

### Summary

A number of respondents discuss appeals and litigation with specific reference to the Roadless Area Conservation Rule. According to some, litigation frequently arises because of polarization of the public regarding cumulative effects and access issues. These respondents conclude that implementation of a national policy would cut down on both litigation and appeals during local decisionmaking.

One individual asserts that any attempt to modify the Rule through settlement of litigation would be illegal. Others suggest that the only reason the Rule is tied up in litigation now is because the Forest Service did not pay sufficient heed to public concerns expressed during the previous comment periods. These people say the Agency should delay any decision on the Rule until judicial review so that the impacts of proposed management can be appropriately analyzed.

Some respondents assert that the Forest Service should meet the stated objectives presented in its review of the Roadless Area Conservation Rule to the U.S. District Court. Additionally, others call on the Forest Service to address specific issues related to the legal challenge to the Rule brought by North Dakota interests.

### *Roadless Area Conservation Rule*

#### **103. Public Concern: The Forest Service should implement the existing Roadless Area Conservation Rule.**

##### **TO ELIMINATE PROLONGED AND COSTLY LEGAL BATTLES**

The implementation of the existing rule will eliminate prolonged and costly legal battles that have been the history of the “local decision process.” The local decision making process usually results in battles between extractive industries and environmentalists on issues of roads and cumulative impacts. (Individual, Juneau, AK - #A11676.10159)

The Roadless Rule deals with specific issues that the Forest Service determined were inadequately considered and handled in forest-specific planning processes for many years. As written, it takes a targeted, balanced, and fiscally responsible approach to these issues. It addresses only two management categories, logging and roads (and only in areas long since identified and mapped by individual national forests, as corrected during the Rule’s public comment period). These are activities that the Forest Service found had costs—both ecological and economic—and cumulative national-level significance that were not reflected in local planning processes. The essence of the Rule, and its promise to lead your agency into a more responsible and less contentious future, lies in barring most logging and road-building in previously inventoried roadless areas, and in foreclosing reconsideration of that decision at the local level. (Organization, Olympia, WA - #A20145.10111)

#### **104. Public Concern: The Forest Service should recognize that any attempt to modify the Roadless Area Conservation Rule through settlement of litigation would be illegal.**

Merely being in litigation on the rule in a Federal Courtroom (far removed from public scrutiny) does not relieve the administration of its duties to the Congress and the public they represent. It is my firm belief that any attempt to modify the rule through settlement of litigation would be illegal under current law and certainly a breach of public trust in their elected officials. (Individual, Broomfield, CO - #A211.10159)

## 105. Public Concern: The Forest Service should pay greater heed to public comment.

### TO AVOID LITIGATION

The material enclosed with this letter is on account of Forest Service Roadless Area Conservation Plan Final EIS volume 3 response, p. 2, #5 - *“The public submitted a large number of suggestions about national forest and grassland management in general, rather than roadless area conservation in specific . . . . In most cases, Volume 3 explained that these were outside the scope of the analysis.”* [emphasis mine] This attitude forced states and organizations into litigation. The USFS basically told those Americans, “So what? Sue us!”—and they did. Such attitude gives rise to question the reasons for over 40 firefighters killed over the last two fire seasons.

Nonetheless, as you state on page four of your advance notice of proposed rulemaking, request for comment (36 CFR Parts 219 and 294), “Eight lawsuits, involving seven states in six judicial districts of four federal circuits have been filed against the January 12, 2001, rule.” Had the former Chief and down-line Washington D.C. officials in CEQ and USFS environmental who collaborated together in ignoring comments pertaining to the resultant lawsuits reviewed the comments and questions of the day equally, you would not now be wasting taxpayer dollars pleasing the courts. (Individual, Rock Springs, WY - #A15658.10139)

## 106. Public Concern: The Forest Service should delay any decision on the Roadless Area Conservation Rule until judicial review.

It would be inefficient, and may not be in the public interest, for the Forest Service to proceed with any rulemaking proposal that tinkers at the margins with the January 2001 roadless area rules, (e.g., by transforming them from permanent rules into rules which govern only until a revised forest plan has been issued) before the legal constraints on nationwide roadless area rules are resolved in the roadless area cases. If the Forest Service initiates rulemaking now, the agency’s NEPA, NFMA, and Regulatory Flexibility Act (RFA) compliance documents would likely assume that the 2001 roadless area rules are in effect under the “no action” alternative, and would compare the incremental impacts of the new proposal to that baseline. If a final court order in the roadless cases later sets aside the roadless area rules, then (at the very least) the NEPA, NFMA, and RFA documents on the proposed revised rules will have used the wrong baseline for calculating the incremental impacts of the proposal. New documents would have to be prepared that analyze impacts from a “no action” baseline that consists of the protection of, and uses allowed in, individual unroaded areas under the governing forest plans. The agency’s time and money in preparing the draft documents will have been wasted. The public comments on draft NEPA and RFA documents will have been for naught, and the public would be asked to comment on revised documents. (Business or Association, Terra Bella, CA - #A15588.10139)

### SO THAT THE IMPACTS OF PROPOSED MANAGEMENT CAN BE ANALYZED AGAINST THE APPROPRIATE BASELINE

**The Forest Service should defer further Roadless Rulemaking until the Roadless Area Cases resolve the legal constraints on national roadless rules.** . . . If the Forest Service initiates rulemaking now, the agency’s NEPA, NFMA, and Regulatory Flexibility Act (“RFA”) compliance documents would likely assume that the 2001 roadless area rules are in effect under the “no action” alternative, and would compare the incremental impacts of the new proposal to that baseline. If a final court order in the roadless cases later sets aside the roadless area rules, then (at the very least) the NEPA, NFMA and RFA documents on the proposed revised rules will have used the wrong baseline for calculating the incremental impacts of the proposal. New documents would have to be prepared that analyze impacts from a “no action” baseline that consists of the protection of, and uses allowed in, individual unroaded areas under the governing forest plans. The agency’s time and money in preparing the draft documents will have been wasted. The public comments on draft NEPA and RFA documents will have been for naught, and the public would be asked to comment on revised documents.

Further, a finding that the 2001 roadless area rules are invalid could change the type of roadless area proposal that this Administration chooses to advocate and adopt. If the Administration’s roadless area initiative is compared against the baseline of the roadless area uses allowed under the controlling forest

plans (rather than the baseline level of protection under the invalid January 2001 roadless area rules), the Forest Service may have more room to adopt measures that include greater preservation of roadless areas than the forest plans provide for: but which allow for more forest health protection and developmental uses than under the January 2001 roadless area rules. The Forest Service and this Administration would be exposed to greater public criticism: (1) if it starts with one roadless regulatory proposal, then shifts course after the roadless area rules have been invalidated in court; and (2) requests public comment several times on different rulemaking proposals, and NEPA, NFMA, and RFA compliance documents. Thus, the public interests in efficient government, in not wasting the public's time in commenting on likely-unlawful proposals, and in legal certainty all favor obtaining judicial resolution of the roadless cases before the Forest Service proceeds too far on another roadless rulemaking proposal. (Business or Association, Rockville, MD - #A13306.20200)

### **107. Public Concern: The Forest Service should meet stated objectives presented in its review of the Roadless Area Conservation Rule to the U.S. District Court.**

#### **Forest Service Position in *Kootenai Tribe of Idaho v. Veneman*] (Consolidated)**

The Forest Service identified the following objectives in its review of the roadless regulation to the Idaho U.S. District Court and in the ANPR: (1) protect roadless area values and characteristics; (2) remedy procedural concerns, including but not limited to (a) lack of site-specific identification of the areas; (b) exclusion of actual roaded areas; (c) assure that any amendment responds to local information and conforms to NEPA and NFMA; and (3) protect communities, homes, and property under a good neighbor policy. Declaration of Dale N. Bosworth, May 3, 2001. The Forest Service also represented to the federal court that it has adopted a more formal policy to implement the above objectives, including protecting access to property. 66 Fed. Reg. at 35919. To date that has not occurred in North Dakota. (Organization, Denver, CO - #A21358.10131)

### **108. Public Concern: The Forest Service should address issues related to the legal challenge brought by North Dakota interests.**

The National Grasslands were acquired for specific purposes, which are established in the complaints in condemnation. The United States chose to specify the public purposes and they were incorporated and adopted in the judgment of condemnation. Thus, the United States is still subject to the terms and conditions. These have been fully described and discussed in the HAND [Heritage Alliance of North Dakota] comments and the chapter on roads.

Furthermore, the county royalty rights and state lands further limit the Forest Service ability to restrict land uses. The lands should remain in agriculture use, available for mineral development and recreation. Even the artificial constraints like prohibiting hunters from cross-country access to retrieve their big game are unwarranted and should be repealed. (Elected Official, McKenzie County, ND - #A27737.90100)

#### **STATE-GRANTED PUBLIC RIGHTS-OF-WAY ALONG SECTION LINES**

The roadless rule does not take into account North Dakota laws that allow for public right-of-way along section lines throughout the National Grasslands. North Dakota's previous Attorney General issued an opinion which supported this local right-of-way access, and our current Attorney General has just announced that the state of North Dakota will join the legal challenge to this roadless rule submitted by North Dakota interests earlier this year. (United States Representative, North Dakota, - #A23212.20400)

The access and private property rights issue has been controversial in North Dakota for some time. Several counties have filed lawsuits, as has the State of North Dakota. The North Dakota suit claims the roadless areas and road-building ban are contrary to a law created by the Dakota Territorial Legislature in 1871. The law designated all section lines in the state as public highways, regardless of whether a road actually existed. The state suit claims any Forest Service proposal that would deprive the state of its right to develop section lines would be illegal. (Business or Association, Bismarck, ND - #A30187.20400)

**DESCRIPTION OF THE ROADLESS ISSUE AS IT APPLIES TO THE NORTH DAKOTA LITIGATION IS INACCURATE**

The Forest Service's description of the roadless issue as it applies to the North Dakota litigation is . . . inaccurate. The Forest Service notes that there are 8 lawsuits in six different jurisdictions and all express a common theme of inadequate public comment and review. *Id.* The North Dakota case takes the position that countless comments on the Dakota Prairie Grasslands Draft Plan Revision, the roadless rule and forest road transportation regulations that North Dakota lands managed by the Forest Service are not subject to the same laws and roadless management is both without legal authority and not feasible given the extensive network of roads and rights-of-way which run through each and everyone of the "roadless conservation areas" in North Dakota. The North Dakota situation is also different because the final plan revision converts the proposed wilderness areas to roadless conservation areas, while purporting to make site-specific determinations that these areas have "roadless values" which were actually "wilderness values." The decisions in the forest plan are no more accurate or valid than the roadless regulation now so heavily criticized throughout the country. (Elected Official, McKenzie County, ND - #A27737.10139)

**ROADLESS AREAS RECOMMENDED AS WILDERNESS IN THE NORTH DAKOTA DRAFT PLAN REVISION WERE ALSO RECOMMENDED AS ROADLESS AREAS IN THE ROADLESS AREA CONSERVATION RULE**

The Idaho litigation specifically took the national roadless regulation process to task for the failure to do a site specific inventory, to provide accurate maps, or to provide sufficient information and time for the affected interests and state and local governmental entities to comment. *See Kootenai Tribe of Idaho v. Glickman*, No. 01-10, Complaint [sections] 71-72; *Kemphorne v. U.S. Forest Service*, Complaint [sections] 163-66. However, additional notice and comment will not address the legal deficiencies of the FEIS in North Dakota where the underlying legal and factual assumptions are wrong.

The roadless conservation areas in North Dakota were first proposed as recommended wilderness areas in the draft plan revision released in July 1999. Northern Great Plains Plan Revision, DEIS, App. C. The comment period for the draft plan revision overlapped with the initiation of the roadless conservation rule and the areas designated in the regulation are identical to those proposed for wilderness in the draft plan revision. (Organization, Denver, CO - #A21358.10130)

**THE ROADLESS AREA CONSERVATION RULE FAILED TO RECOGNIZE THE EXTENSIVE ROAD SYSTEM IN AREAS IN NORTH DAKOTA IDENTIFIED AS ROADLESS**

One of the major issues regarding proposed wilderness and now roadless conservation areas in North Dakota is the fact that these areas have extensive road systems. This fact is admitted in the 1987 Custer Forest Plan. *See* Appendix C, FEIS. The 1999 draft plan revision, which preceded the roadless rulemaking by a few months, omits any enumeration of roads, although these roads still exist. The 2001 final plan revision and FEIS do not address the specific comments made about each unit, especially the roads found throughout these units. Thus, the record shows a specific failure of the agency to deal with the material information, that these units are not roadless, but in fact are "roaded areas".

The ANPR does not correct this failure because it incorrectly assumes that all of these roadless conservation areas are in fact roadless. Unless and until the Forest Service addresses this issue, no amount of process will undo the harm to North Dakota communities and governmental interests. (Elected Official, McKenzie County, Watford City, ND - #A27737.45514)

## Other Cases

### 109. Public Concern: The Forest Service should disclose its role in the Luppi case.

As an inholder myself I have been trying to get some response to the following article in the New American. Could you, please comment on the Luppi case and the Forest Service's part in it. (Individual, No Address - #A26701.14140)

## Other Legal Concerns

This section includes three subsections: Other Legal Concerns General; The U.S. Constitution; and Federal Laws, Acts, and Policies.

### Other Legal Concerns General

#### Summary

Most general comments regarding legal issues revolve around the Forest Service's legal authority to enact regulations such as the Roadless Area Conservation Rule and the legal adequacy of the Rule in general. One organization responds that the USFS has only as much authority to make law as may be delegated to it by Congress under Congress's constitutional authority to make law. This respondent believe that agencies cannot create legitimate regulations in, what they consider, defiance of Congress by calling inherent regulatory components such as definitions 'policy'. Some respondents assert that the Forest Service should not implement the Roadless Area Conservation Rule because it fails to adhere to existing laws, regulations, and policies.

Other respondents urge the Agency to develop a new national roadless rule that is fully compliant with the law and suggest that the fair way to address the concerns raised by interested parties is to urge the Administration to develop a new rule that is fully compliant with the law, including the National Environmental Policy Act and the National Forest Management Act.”

Another individual comments more broadly that legal criteria must be developed which strictly defines what government agencies and private corporations can and cannot do on public land because, this respondent goes on, both the Forest Service and the Bureau of Land Management have shown themselves incapable of protecting the environment. A state agency urges the Forest Service to support the consolidation of existing federal legislation and rules because they believe there are too many statutes and regulations pulling the USDA Forest Service in too many directions. At the same time, one individual says the Forest Service should stop trying to enact legislation through changing rules and regulations in the Federal Register. Finally, one respondent suggests that foresters be required to review their assigned territory annually and make management recommendations to their supervisors for the purpose of reviewing and updating relevant laws, regulations, and policies.

#### **110. Public Concern: The Forest Service should recognize that it has only as much authority to make law as may be delegated to it by Congress.**

##### **TO MAINTAIN ITS LEGITIMACY WITH THE PUBLIC**

The USFS has only as much authority to make law as may be delegated to it by Congress under Congress's constitutional authority to make law. The agencies cannot create legitimate regulations in defiance of Congress by calling inherent regulatory components such as definitions “policy.”

The matter of legitimacy arises when a government is perceived by those it governs to act outside the bounds of its authority. The reason the Soviet Union lost its hold over its constitutive nations and fell apart was not because the Soviet Union ran out of machine guns, jack booted thugs, barbed wire, dogs, hydrogen bombs, or KGB agents. It was because the Soviet government lost legitimacy in the eyes of its citizens.

The USFS may believe that, no matter how unlawful its rules and no matter how much these rules are hated by those upon whom they are imposed, all USFS needs is a large enough army of armed enforcers to get its way. But the perception of a certain degree of legitimacy is necessary, even in a totalitarian state such as the Soviet Union. To many westerners, USFS must obey the law or suffer the consequences that will inevitably occur as you erode your own legitimacy. (Organization, Tonopah, NV - #A20337.12230)

### **111. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.**

#### **BECAUSE IT FAILS TO ADHERE TO EXISTING LAWS, REGULATIONS, AND POLICIES**

Our opposition to the Rule is based on our belief that the Rule violates numerous existing national laws, including the National Forest Management Act (NFMA), the National Environmental Policy Act (NEPA), the Alaska National Interest Lands Conservation Act (ANILCA), the Tongass Timber Reform Act (TTRA), the Organic Administration Act (OAA), and the Multiple-use Sustained Yield Act (MUSYA). Alaska would be irreparably harmed by the failure to follow these existing laws and by the arbitrary amendments to the revised Tongass Land Management Plan (TLUMP) that implementation of the Roadless Rule would create. (Elected Official, Petersburg, AK - #A23084.20200)

In my judgment the entire Roadless area Conservation Rule effort should be dropped. The Roadless Area Conservation Rule is illegal because it was conducted without adequate information about the affected areas; it was pre-decisional; it was based on new Planning Regulations (36 CFR 219) that have been withdrawn; it is illegal under the Washington State Wilderness Acts; it amends or revises individual Forest Plans without compliance with the National Forest Management Act; the EIS did not have an adequate array of alternatives; and the analysis ignored substantial concerns raised by the public. (Business or Association, Colville, WA - #A3091.20000)

The January rules violated the National Forest Management Act (NFMA), the Multiple Use Sustained Yield Act (MUSYA), the Acts of Congress designation Wilderness areas in a State and releasing remaining roadless areas for the multiple uses prescribed in forest plans, (Statewide Wilderness Acts), and other laws, as we allege in the lawsuit brought by AF and PA and 16 other plaintiffs, American Forest and Paper Association v. Veneman, No. 01-CV-00871 (D.D.C.) and in our comments on the proposed roadless area regulations. We have attached copies of our July 14, 2000 comments and our Second Amendment Complaint. We incorporate those documents by reference.

In brief, the January 2001 roadless area rules unlawfully attempt to override and ignore the forest plans and the multiple use allocation process mandated by the NFMA and Statewide Wilderness Acts.

In AF and PA v. Veneman, AF and PA's position is that national level rulemaking on roadless areas is unlawful unless the Forest Service conducts the rulemaking in a manner that also complies with the constraints in the NFMA, MUSYA, the Statewide Wilderness Acts, and other laws. We believe that the January 2001 roadless area rules are unlawful and must be set aside. (Business or Association, Terra Bella, CA - #A15588.20200)

### **112. Public Concern: The Forest Service should develop a new national roadless rule that is fully compliant with the law.**

I believe that the only fair way to address the concerns raised by interested parties is to urge the Bush administration to develop a new rule that is fully compliant with the law, including the National Environmental Policy Act and the National Forest Management Act. This may include a determination that some roadless areas be recommended for permanent wilderness designation; some roadless areas be identified for protection of their outstanding roadless characteristics in the National Forest Plan; and some existing roadless areas be allocated to allow roads to be built for management of the resources and to allow public vehicle access. (Individual, McMinnville, OR - #A3714.10130)

**113. Public Concern: The Forest Service should comply with existing federal laws, acts, and regulations.****SO STATES, COMMUNITIES, ORGANIZATIONS, AND INDIVIDUALS MAY BENEFIT FROM THE ENTIRE RANGE OF USES**

The Roadless Area Conservation Rule, published January 12, 2001 was challenged by the State of Alaska's Complaint filed in District Court January 31, 2001. At least five other states, tribes and various interested parties have also challenged this rule. The Facts and Claims of the Alaska Complaint enumerates specific violations of the National Forest Management Act (NFMA), National Environmental Policy Act (NEPA), Alaska National Interest Lands Conservation Act (ANILCA), Tongass Timber Reform Act (TTRA), The Organic Administration Act (OAA) and the Multiple-Use Sustained-Yield Act (MUSYA). Alaska has been irreparably harmed by the failure to follow these laws and by the arbitrary and capricious amendments to the revised Tongass and Chugach National Forest Land Management Plans.

The Ketchikan Chamber of Commerce supports Alaska's Complaint and endorses the Forest Service's decision to re-examine the Roadless Area Conservation Rule.

It is imperative that National Forests be managed in accord with the above statutes, so states, communities, organizations and individuals may benefit from the entire range of uses including intensive commodity and recreation use: dispersed and remote backcountry experiences as well as Wilderness Areas designated by Congress. Management plans and action programs must be science-based. (Business, Ketchikan, AK - #A8066.20200)

**114. Public Concern: Legal criteria must be developed which strictly defines what government agencies and private corporations can and cannot do on public land.****BECAUSE BOTH THE FOREST SERVICE AND THE BUREAU OF LAND MANAGEMENT HAVE SHOWN THEMSELVES INCAPABLE OF PROTECTING THE ENVIRONMENT**

I live surrounded by heavily-roaded National Forest Service Land, and have seen USFS land that is roadless. The latter surpasses the former in terms of habitat, watershed, and ecosystem quality. Historically the USFS and its companion agencies (BLM, etc.) have shown absolutely no capability to manage for ecosystem health, watershed quality or habitat protection, nor should any reasonable citizen expect those agencies to protect limited resources in the near future. The full letter of the law must be brought to bear in order to define what government agencies and private corporations can and cannot do on public land. (Individual, Missoula, MT - #A21345.13100)

**115. Public Concern: The Forest Service should support the consolidation of existing federal legislation and rules.**

National Forest planning processes and land management decisions would benefit from a consolidation of existing federal legislation and rules (i.e., there are too many statutes and regulations pulling the USDA Forest Service in too many directions). (State Agency, Saint Paul, MN - #A30025.20000)

**116. Public Concern: The Forest Service should stop trying to enact legislation through changing rules and regulations in the Federal Register.**

I believe that the Forest Service and other Federal agencies need to stop trying to enact legislation through changing rules and regulations in the Federal Register. The Federal Register was never meant to be a vehicle to bypass Congress and due process of law. If scientific studies show that an area has wilderness value or is too sensitive to have roads then propose it as wilderness and work through Congress for the proper designation. There should not be a separate designation as "Roadless" which amounts to de facto Wilderness. (Individual, Elko, NV - #A30690.20000)

**117. Public Concern: The Forest Service should require foresters to review their assigned territory annually and make management recommendations to their supervisors.**

**FOR THE PURPOSE OF REVIEWING AND UPDATING RELEVANT LAWS, REGULATIONS, AND POLICIES**

The forest service has undertaken a project that is long over due. To dig deep into the regulations, laws, policies. They sure need a thorough re-reading for the purpose of updating each set of rules, polices, regulations, and even updated laws that need re-writing. From year to year each forester should be required to review the territory that he or she is assigned to. After this review each should write a thorough report of his findings in his territory. Also make recommendations to his supervisor. Remember this should have in mind that these changes mentioned above will have to be programs through your congressman, so that funds are appropriated for the job. (Individual, Celina, TN - #A11902.13212)

**118. Public Concern: The Forest Service should avoid extreme interpretations of environmental laws.**

Stop giving Environmentalists the benefit of the doubt.

Work to the short sides of the environmental laws instead of pushing their extreme limits. (Individual, Greeley, CO - #A28995.20000)

## The U.S. Constitution

### Summary

The constitutional issue most frequently mentioned by respondents is the doctrine of states' sovereignty. Some respondents assert that the Roadless Area Conservation Rule is a violation of states' sovereignty inasmuch as it seeks to control land within state borders. According to one individual, the only land the government should manage for is forts, post offices, and other conceived legitimate needs. According to others, the claim that federally owned lands within a state are illegally occupied, and a violation of that state's sovereignty, is false and believe that these lands are owned in common by all Americans, and should not be managed for the benefit of local residents and landowners.

One association asserts that the Rule seeks to protect spiritual values of the land which are associated with, they believe, religious connotations which they conclude, if the Roadless Rule is implemented would constitute a violation of the establishment clause of the First Amendment. Another respondent urges the Forest Service to comply with the commerce clause of the Constitution by avoiding any policy that would make it easier to remove timber in one state than in another. Others advise compliance with the Second and Tenth Amendments; and according to one respondent, the Forest Service should consider the constitutional impacts of one administration summarily dismissing the previous administration's rulings.

**119. Public Concern: The Forest Service should ensure that the Roadless Area Conservation Rule is in line with the U.S. Constitution.**

I challenge the authority of the [Executive] Branch of government to make rules and regulations of this nature. I challenge any act of Congress that violates our Constitution. The Roadless Initiative and ESA do indeed violate our Constitution. Marbury vs: Madison says any act, rule, regulation, or law that is repugnant to the Constitution does not have to be obeyed and no court is bound to enforce it. The roadless initiative is repugnant to the Constitution and I will not obey it. The roadless initiative and the ESA has led to the death of four fighters this year. Our acts and initiatives are now killing citizens. Do away with them. (Individual, Seiad Valley, CA - #A5092.20100)

**120. Public Concern: The Forest Service should recognize the U.S. Constitution's doctrine of states' sovereignty.**

I oppose former President Clinton's 58 million acre Roadless plan. President Clinton exceeded delegated powers defined in Article 2, Section 2 of the U.S. Constitution. There is no power granted which allows the President power to control sovereign State lands beyond those designated by Article 1, Section 8, which limits lands controlled by the United States "not to exceed ten mile square", within the District of Columbia and lands purchased and delegated by State governments voting approval of such land occupation by the federal government.

As such, President Clinton violated the Constitution and his oath of office as sworn to in Article 2, section 2. All such Presidential declarations, by whatever means, are null, void and of no effect.

Given the above violations, Presidential designation of road closure or controls in sovereign State territory contrary to the Constitution and laws of the sovereign States, are unenforceable and must be vacated immediately. (Individual, No Address - #A27381.20100)

The sovereignty of the states in which these areas lie is another casualty of Clinton's orders. Local input and local decisions are completely eliminated by a de facto closing of large tracks of forestland. It is outrageous that in the United States of America we still have to remind elected officials about constitutional principles. Among them (in this instance) the strict limits the Constitution places on the federal government. Even though this land is ostensibly federal lands, it resides within the borders of sovereign states and must give, at a minimum, respect to the local authorities and citizens and allow them a much greater role in the process. (Organization, Brattleboro, VT - #A27756.20100)

Lands within the States, which were not purchased by the Federal Government, belong to the States (Article 1, Sec.8, Clause 17, US Constitution). We believe this and therefore any claim by the Federal Government and Forest Service as its agent, is void, as pertains to the roadless issue. It is reserved to the States themselves. (Individual, Hawthorne, NV - #A736.20100)

**121. Public Concern: The Forest Service should review the U.S. Constitution's doctrine of states' rights before considering any actions affecting Revised Statute 2477 roads.**

Please note these facts before any further rule making and before any further actions are taken by any federal agency regarding: 'Public Lands', the forest and RS2477 Roads.

The 10th Amendment to the Constitution (Bill of Rights) plainly states: "Those powers not granted to the federal government within the Constitution are reserved to the States and their people respectively." (Individual, No Address - #A783.20100)

**122. Public Concern: The Forest Service should recognize that, under the U.S. Constitution, the government may only own land for forts, post offices, and other legitimate needs.**

Follow the basic constitution that states the only land the government should have is for forts, post offices, and other legitimate needs. (Individual, Fallon, NV - #A21953.20100)

**123. Public Concern: The Forest Service should acknowledge that federal ownership of land is not a violation of the U.S. Constitution's doctrine of states' sovereignty.**

There is a belief that the federally owned lands within a state are somehow illegally occupied, and a violation of that state's sovereignty. That is completely false—those lands are owned in common by all Americans, and should not be managed for the financial benefit of a few loggers or ranchers, any more than I should be compelled to allow a logging company to clear cut my backyard, and then pay them for their costs. (Individual, No Address - #A470.12300)

## **124. Public Concern: The Forest Service should comply with the establishment clause of the First Amendment.**

### **BY AVOIDING MANAGEMENT BASED ON RELIGIOUS VALUES**

To our knowledge, the Clinton Administration did not properly review one aspect of the [Roadless] Initiative, its compliance with the Establishment Clause of the First Amendment of the Federal Constitution. We ask that you suspend the Rule providing for the Roadless Initiative until compliance has been sustained as a matter of law. We believe the Roadless Initiative violates the Constitution because it favors a narrow set of religious beliefs. The purpose as stated within the Final Environmental Impact Statement (FEIS) of the Roadless Initiative does not rest on scientific necessity, but rather on value-based concepts regarding humans' relationship to nature, an ideology. Page ES-1 states that the purpose and need for the Roadless Initiative is to "stop activities that pose the greatest risk to the social and ecological values of inventoried Roadless areas." Those activities are human activities. To stop them implies a value judgment being made about human activities. On what justification does such a value judgment rest?

Pages ES-5 and 3-17 of the FEIS clarifies what value the United States Forest Service feels are put at risk and would be protected by a prohibition on road building and timber cutting. Page ES-5 states that road building and timber cutting could "lead to a loss of non-commodity values such as ecological values, solitude, and personal renewal in wild areas."

Page 3-17 Spiritual and aesthetic values towards forests include the belief that NFS lands have intrinsic value, and a right to exist; that current generations have an obligation to pass on healthy wild lands to future generations; that forests are sacred; that forests have spiritual values. This is the language of religion, not science. The FEIS clearly states protecting values as a management objective. Whose spiritual values? The religious beliefs and values of all the citizens protected by the Constitution?

This spiritual value, which is a management objective of the proposed Roadless Initiative, parallels the religious ideology known as Deep Ecology and other religions who worship nature. (Business or Association, Tower, MN - #A17499.20100)

## **125. Public Concern: The Forest Service should comply with the commerce clause in the U.S. Constitution.**

### **BY AVOIDING ANY POLICY THAT WOULD MAKE IT EASIER TO HARVEST TIMBER IN ONE STATE THAN IN ANOTHER**

Lumber is obviously an article of interstate commerce. Consequently, it would seem violative of the commerce clause to permit logging more easily in one state than in another. It does not seem that this issue has been adequately addressed, but it should be violative to allow a lumber company to cut national forest trees more easily in one state than another. In any event, it would certainly not appear the exercise of responsible stewardship to permit that to happen. (Organization, Birmingham, AL - #A21582.20200)

## **126. Public Concern: The Forest Service should honor the Second Amendment.**

Let's keep the second amendment and manage our wildlife and waters for the future. (Individual, Edmore, MI - #A7313.50000)

Please don't let down in the 2nd Amend. Keep the areas for the hunters and fishermen. This country needs to get back to the founding fathers plans for the statement by the people and for the people. Don't become a dictator nation. (Individual, McCook, NE - #A11142.20100)

## **127. Public Concern: The Forest Service should abide by the Tenth Amendment.**

We must adhere to the 10<sup>th</sup> amendment to the US Constitution. There is no place for the man in the biosphere now should any entity of the United Nations have any say so whatsoever! (Individual, Mount Ida, AR - #A13372.20100)

## 128. Public Concern: The Forest Service should consider the constitutional impacts of one administration summarily dismissing the previous administration's rulings.

I am writing you concerning the call for 'written comments before September 10th' about the Clinton Administration's ban on logging and road construction, and the Bush Admin's taking issue with this ban. I am very much afraid of what the indiscriminate shredding of one administration's rulings by the next does constitutionally for this country. (Individual, Seattle, WA - #A11712.12111)

## Federal Laws, Acts, and Policies

Respondents comment about the legality of the Roadless Area Conservation Rule specifically as it relates to certain federal laws, acts and policies. Following are major topics associated with some of the more frequently cited acts.

**Alaska National Interest Land Conservation Act (ANILCA)** – Respondents urge the Forest Service to comply with ANILCA by providing reasonable and timely access to inholdings (see also Chapter 6: Protecting Access to Property (Question 5): Legal Considerations); by excluding the Tongass National Forest from the final rule (see also Chapter 5: Designating Areas (Question 8): Inclusion/Exclusion of Specific Areas from a National Roadless Rule: *Exclusion*); and by, in general, foregoing sweeping national level withdrawals such as the Roadless Area Conservation Rule. On the other hand, at least one respondent suggests that ANILCA needs to be revised to allow ownership of private inholdings within roadless areas without the accompanying obligation to allow roaded access to them.

**Americans with Disabilities Act (ADA)** – ADA comments arise most frequently in connection to access. Some respondents comment that roadless protection will seriously impact the ability of elderly or physically impaired forest visitors to access roadless areas, and claim that, per the ADA, the Forest Service has a legal obligation to maintain roaded access or allow such access to be developed. Others, however, say there is already sufficient access and that the preservation of access for the elderly and handicapped should not be used as an excuse to build roads. (See also Chapter 4: Social Environment and Values: Social Values of Roadless Areas; *Access for Special Populations*.)

**Clean Water Act (CWA)** – Respondents urge the Forest Service to comply with the CWA by including in management plans roads that cross streams or wetlands, and by obtaining the necessary permits and exemptions for closing forest system roads. One respondent reminds the Forest Service of their legal obligations to follow the law. Some suggest that the CWA and the Endangered species Act should be integrated early in the forest planning process.

**Endangered Species Act (ESA)** – Comments regarding the ESA are mixed. Some respondents urge the Forest Service to comply with the Act. Others advocate eliminating the ESA in its present form because of its impact on private property rights, because of its perceived role in closing roads, and because of its use in litigation. Some assert that groups are unfairly using the ESA as a weapon against traditional uses of forest lands, and that the Forest Service should support legislation which would prevent litigation over the ESA and reimbursement of legal fees. (See also Chapter 4: Environmental Values: Threatened and Endangered Species.)

**Mining Laws** – One association lays out the history of multiple laws and regulatory acts which, this association concludes, obligates the Forest Service to maintain roaded access for mineral exploration and development. Generally, respondents urge the Forest Service to comply with the

Mining Law of 1872 and the Mining and Mineral Policy Act to ensure access to mineral deposits in National Forest System lands that they believe would enable this country to remain free of foreign dependence on raw materials. Others suggest such laws should be repealed. (See also Chapter 4: Economic Environment and Values: Economic Effects: *Effects on the Mining, Oil, and Gas Industries*; and Chapter 5: Activities (Question 7): Mining, Oil, and Gas Development.)

**Multiple Use and Sustained Yield Act (MUSYA)** – Respondents frequently comment that a national roadless rule would effectively eliminate multiple use management of roadless areas. A number of respondents suggest that, under MUSYA, public lands must remain open to such uses as extraction activities and motorized recreation. Others, however, assert that multiple use does not mean that every use must be accommodated in every part of the forest and that protection of roadless areas is fully in keeping with MUSYA. Further, some say, the congressional mandate to provide sustained yield of renewable resources ought to be reevaluated inasmuch that they conclude that forest management has not successfully provided sustained yield. (See also Chapter 4: Environmental Values: Management: *Multiple Use Management, Allow Multiple Use Management, and Do Not Allow/Reconsider Multiple Use Management*.)

**Regulatory Flexibility Act (RFA)** – Some respondents assert that the Forest Service should comply with the RFA by completing a regulatory flexibility analysis for the Roadless rule that would show no direct or indirect financial impact on small businesses. They believe that only then, after certifying no significant economic impact on a substantial number of small entities, should the Agency go forward with a national policy. Likewise, one respondent points out that each IRFA [Initial Regulatory Flexibility Analysis] contain a description of any significant alternatives to the January 12 Rule which accomplish the stated objectives of applicable statutes and which minimize any significant economic impact of the January 12 Rule on small entities. This respondent believes that the IRFA prepared by the USFS was devoid of any attempt to satisfy this requirement. (See also Chapter 4: Economic Environment and Values: Adequacy of Analysis.)

**Revised Statute 2477 (RS 2477)** – Some assert that the Forest Service should comply with RS 2477 with respect to road closures. A number of people say that a national roadless rule would result in the closure of many roads whose status as public rights-of-way, they claim, is protected under RS 2477. A typical belief, regarding this issue, is that it is illegal to close many of these roads under RS 2477 and the Roadless Rule seeks to decrease public access to the back country. At the same time, one respondent states that the Forest Service currently has no policy in place to recognize or deal with RS2477 roads, and asks the Agency to clarify its position on this issue, especially as it relates to roadless areas. (See also Chapter 5: Activities (Question 7): Travel Management General: *Roads*.)

**Tongass Timber Reform Act (TTRA)** – Some respondents urge the Forest Service to comply with the TTRA by excluding the Tongass National Forest from a national roadless rule. According to respondents, by including the Tongass in the final Rule prohibits the Forest Service from complying with the Tongass Timber Reform Act (TTRA) and the Alaska National Interest Lands Conservation Act (ANILCA). These respondents do not see how the Forest Service will be able to supply an adequate volume of timber to meet the needs of Alaska resource dependant businesses and residents.

Other respondents assert that, per multiple legal rulings, the TTRA does not require unconditional timber sale offerings; thus the TTRA cannot be used as a rationale for excluding the Tongass from national roadless protection. (See also Chapter 5: Designating Areas (Question 8): Inclusion/Exclusion of Specific Areas from a National Roadless Rule.)

**Wilderness Act** – A number of respondents state that the Roadless Area Conservation Rule violates the Wilderness Act. They assert that by imposing special restrictions on roadless areas, the Forest Service is in effect creating de facto wilderness areas without benefit of congressional approval. Others, however, assert that the Rule does not constitute a violation of the Act. Beyond that, many comments regarding the Wilderness Act are made in reference to procedures for wilderness recommendation. (See also Chapter 5: Designating Areas (Question 8): Wilderness Recommendations.)

### *Administrative Procedures Act*

#### **129. Public Concern: The Administration should comply with the Administrative Procedures Act.**

This is a ‘desk drawer’ rule in violation of the Administrative Procedures Act. (Individual, Gold Bar, WA - #A28501.20209)

##### **BY PROVIDING ADEQUATE INFORMATION AND TIME TO COMMENT**

The Administrative Procedures Act (APA) requires that a Federal agency shall give notice of a proposed rulemaking in the Federal Register, and thereafter provide interested persons an opportunity to participate in that rulemaking by submitting comments. 5 U.S.C.A., Chapter 5 [section] 553. Furthermore, the agency must consider all of the comments received before finalizing the rule, *Id.* The time provided by the Forest Service for public comments was insufficient due to the breadth and complexity of both the proposed rule and the Draft EIS prepared by the agency. Additionally, there were vital aspects of the Roadless policy that were added into the final rule, but not available for public comment in the proposed rule. Both of these deficiencies are a violation of the APA by the Forest Service. (Business or Association, Washington, DC - #A28689.20209)

The time period provided by the Forest Service was inadequate and the agency did not fulfill its requirements under the APA to provide the public with sufficient opportunity to comment. (Business or Association, Washington, DC - #A28689.20209)

##### **BY PROVIDING EFFECTIVE PUBLIC PROCESS IN PROMULGATING RULES**

It is also the responsibility of any administration to follow the dictates of Congress in exercising their authorities. In this case, that particularly implicates the Administrative Procedures Act’s requirements for an effective public process in promulgating these rules. (Individual, Broomfield, CO - #A211.20209)

### *Alaska National Interest Land Conservation Act*

#### **130. Public Concern: The Forest Service should comply with the Alaska National Interest Lands Conservation Act.**

##### **BY ADEQUATELY ANALYZING IMPACTS OF A NATIONAL ROADLESS RULE ON ALASKA’S NATIONAL FORESTS**

The USFS lands in Alaska, representing over 25 % of lands affected by the roadless rule (14.8 million acres), are subject to federal laws unique to Alaska. The Alaska National Interest Lands Conservation Act (ANILCA) of 1980 established regulatory framework for all federal lands in Alaska and laws specific to the conservation system units established by ANILCA. Preservation of access rights are central to ANILCA and must be preserved in administrative or forest plan level decisions. The Roadless

FEIS claims to have addressed the unique characteristics of federal lands and socioeconomic needs in Alaska in the section devoted specifically to the Tongass National Forest, but in fact failed to identify many provisions of ANILCA.

The FEIS, in its analysis of unique characteristics in Alaska, essentially ignored the 5.6 million acre CNF [Chugach National Forest]. The CNF, with an astonishing 98.9% of its land base classified as roadless, is by far the most affected national forest in the nation. The immense impact that the roadless rule, as presently written, will have on the CNF was not analyzed in the FEIS in even the most rudimentary fashion. For instance, national forests in Alaska were not analyzed for fire risk because “of the low fire hazard and fire occurrence associated with their temperate rain forests” (p. 3-409 Roadless Area Conservation FEIS). (Professional Society, Anchorage, AK - #A21707.20207)

#### **BY EXCLUDING THE TONGASS NATIONAL FOREST FROM THE FINAL RULE**

Including the Tongass in the final rule prohibits the Forest Service from complying with the Tongass Timber Reform Act (TTRA) and the Alaska National Interest Lands Conservation Act (ANILCA). (Elected Official, Haines, AK - #A18063.20400)

#### **BY FOREGOING SWEEPING NATIONAL LEVEL WITHDRAWALS SUCH AS THE ROADLESS AREA CONSERVATION RULE**

With respect to national forests in Alaska, sweeping national level withdrawals such as the Roadless Rule promulgated by the previous administration are contrary to the provisions of subsections 101 (d), 708 and 1326 of the Alaska National Interest Land Conservation Act (ANILCA). (Ketchikan Gateway Borough, AK - #A17476.20201)

All areas of a national forest should be managed in accordance with local land management plans rather than through nationally directed land set-asides. With respect to national forests in Alaska, Section 708 and 1326 of ANILCA prohibit nationally directed agency land set-asides because as found in Section 101(d) of ANILCA, Congress had already set aside enough land in Alaska:

“(d) This act provides sufficient protection of the national interest in the scenic, natural, cultural and environmental values on the public lands in Alaska and at the same time provides adequate opportunity for satisfaction of the economic and social needs of the State of Alaska and its people; accordingly, the designation and disposition of the public lands in Alaska pursuant in this Act are found to present a proper balance between the preservation of national conservation system units and those public lands necessary and appropriate for more intensive use and disposition and thus Congress believes that the need for future legislation designating new conservation units, new national conservation areas or new national recreation areas has been obviated thereby.” (Tribal Corporation, Seattle, WA - #A20468.20207)

#### **BY FOREGOING ANY ATTEMPT TO SET ASIDE LANDS IN ALASKA OUTSIDE THE NATIONAL FOREST MANAGEMENT ACT PLANNING REGULATIONS**

With respect to National Forests in Alaska, Section 708 and 1326 of ANILCA prohibit nationally directed agency land set-asides because, as Congress found in Section 101(d) of ANILCA, Congress had already set aside enough lands in Alaska:

“(d) This act provides sufficient protection of the national interest in the scenic, natural, cultural and environmental values of the public lands in Alaska and at the same time provides adequate opportunity for satisfaction of the economic and social needs of the State of Alaska and its people; accordingly, the designation and disposition of the public lands in Alaska pursuant in this Act are found to present a proper balance between the preservation of national conservation system units and those public lands necessary and appropriate for more intensive use and disposition and thus Congress believes that the need for future legislation designating new conservation units, new national conservation areas or new national recreation areas has been obviated thereby.”

The National Forest Management Act (NFMA) was in existence at the time that ANILCA passed and was not explicitly changed thereby. This means that land planning through National Forest System Planning regulations remain in place as the method by which land management should be formulated on the National Forests in Alaska. Efforts by the bureaucracy to set aside lands in Alaska outside these

planning regulations are illegal under Section 708 and Section 1326 of ANILCA. (Business or Association, Ketchikan, AK - #A20443.20200)

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 authorization has not been given. (Professional Society, Anchorage, AK - #A20340.20207)

#### **BY NOT RECOMMENDING ANYMORE AREAS FOR WILDERNESS DESIGNATION IN ALASKA**

In Alaska, new wilderness designations would be in violation of the "no more" clause of ANILCA. (Organization, Anchorage, AK - #A15542.20207)

#### **BY FOREGOING ANY FURTHER ROADLESS AREA REVIEW AND EVALUATION IN ALASKA**

Section 708 of ANILCA, when combined with Section 1326 of ANILCA, can only be read to direct the Forest Service to conduct no further roadless area reviews and evaluations on the Tongass. In Section 708(a)(2) of ANILCA, Congress stated that it had made its own review and examination of the National Forest Roadless Areas in Alaska and "of the environmental impacts associated with alternative allocations of such areas". Congress further found in Section 708(b)(2), that the 1979 roadless area review and evaluation "was an adequate consideration of suitability of such lands for inclusion in the National wilderness Preservation system". In Section 708(b)(4), ANILCA specifically directs that there will be no "further statewide roadless areas review and evaluation of the National Forest System Lands in the State of Alaska for the purpose of determining their suitability for inclusion in the National Wilderness Preservation System". Clearly the "no timber harvest" uses and "no road building" uses to which the roadless rule would subject these lands is de facto wilderness and thus the roadless rule should not apply to National Forests in Alaska. Finally, Section 1326(b) of ANILCA states as follows:

"(b) no further studies of federal lands in the State of Alaska for the single purpose of considering the establishment of a conservation system unit, national recreation area, national conservation area or for related or similar purposes shall be conducted unless authorized by this Act or further act of Congress."

Clearly the proposed Roadless Rule is a review and study of roadless areas on the Tongass and Chugach. To set these areas aside as "roadless areas" is similar to the establishment of a conservation unit, national recreation area or national conservation area. Thus is prohibited by 1326(b) of ANILCA. The State of Alaska's lawsuit against the roadless rule is based in part on this point. (Business or Association, Ketchikan, AK - #A20443.20207)

#### **BY FOREGOING ANY FURTHER ROADLESS REVIEWS ON THE TONGASS NATIONAL FOREST**

With respect to the Tongass, Congress had determined in ANILCA that the proper balance between preservation and development has been struck. It is also clear under Sections 708 and 1326 of ANILCA that the Forest Service is not to conduct further roadless reviews on the Tongass for the purpose of managing such areas as wilderness or for similar purposes. (Manager, City of Wrangell, AK - #A17670.20200)

#### **BY NOT CLOSING AREAS OF MORE THAN 5,000 ACRES WITHOUT CONGRESSIONAL APPROVAL**

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. (Tribal Corporation, Anchorage, AK - #A20340.20207)

**BY PROVIDING REASONABLE AND TIMELY ACCESS TO INHOLDINGS**

The Forest Service must provide reasonable and timely access to inholdings as required by the Alaska National Interest Lands Conservation Act. If access is limited or if the effects of federal policies preclude owners from effectively managing their lands, land exchange may be necessary. (State Agency, Saint Paul, MN - #A6063.20207)

In Minnesota, we have over forty parcels of state owned land contained within these new roadless areas. The rights of private citizens, states and counties to access their land-as required by the Alaska National Interest Lands Conservation Act-must be provided in a reasonable and timely manner. (Elected Official, State of Minnesota - #A15541.40100)

**131. Public Concern: The Alaska National Interest Land Conservation Act should be amended.****TO ALLOW OWNERSHIP IN INVENTORIED ROADLESS AREAS WITHOUT ROADED ACCESS**

Some states, tribes, organizations, and private citizens do own property within inventoried roadless areas. The Alaska National Interest Land Conservation Act should be changed to allow ownership in such areas without roaded access. (Individual, Grangeville, ID - #A830.20207)

**132. Public Concern: The Forest Service should not use the Alaska National Interest Land Conservation Act as an excuse to grant access.**

USFS needs to stop hiding inappropriately and illegally behind ANILCA in granting access. (Organization, Columbia Falls, MT - #A17951.20207)

*Alaska Native Claims Settlement Act***133. Public Concern: The Forest Service should comply with the Alaska Native Claims Settlement Act.****BY ALLOWING ACCESS TO AMERICAN INDIAN LAND INHOLDINGS**

The proposed policy violates the provisions of the Alaska Native Claims Settlement Act, ANCSA, which guarantees access to native land inholdings. This access problem is readily evident in the Chugach National Forest and the difficulties which Chugach Alaska Natives have had in securing access to their Carbon Mountain land holdings. (Individual, Anchorage, AK - #A11831.20200)

**134. Public Concern: The Forest Service should clarify the rights specified to Alaska Native Claims Settlement Act corporations.**

The national forests in Alaska are different than other national forests in the U.S. in a number of ways, including the passage of the Alaska Native Claims Settlement Act (ANCSA) of 1971. With the passage of ANCSA, 44 million acres of federal lands were made available in 12 regions of the state. Large tracts within both the Tongass and the Chugach National Forests were made available to satisfy the ANCSA mandate, causing ANCSA corporations to be effectively joined at the hip with the USFS in these regions. Despite the spirit and intent of ANCSA, access to their lands continues to be one of the largest obstacles Alaska Native Corporations face in Alaska. The roadless rule, while providing for "valid and existing rights", does little to clarify those rights specified to ANCSA corporations as provided for in ANILCA. (Professional Society, Anchorage, AK - #A21707.20207)

## *Americans with Disabilities Act*

### **135. Public Concern: The Forest Service should comply with the Americans with Disabilities Act.**

I am a disabled American citizens. I fall under the Americans With Disabilities Act. Legislators have made access for me in my business and public places but you have failed in the area that I need access to the most, the Federally Controlled lands of this nation. When you close access to the roads in our National Forests, you lock me out. I cannot hike or back pack and I want the same access as the more healthy and younger people of this county have. I want to be able to drive to good fishing spots, good camping areas away from the crowds, I want to see nature at its best just as do the hikers and back packers. I want the old roads, trails and 4x4 access road left open for me, the elderly, handicapped, infirm, and the young. Do not close them. (Individual, Seiad Valley, CA - #A5092.20210)

#### **BY PROVIDING ADEQUATE ACCESS**

All forms of recreation must be allowed. I believe the roadless policy violates the Americans With Disability's Act. How can old and feeble people enjoy the forests if they don't have motorized access? How can crippled people enjoy their favorite park or stream if they can't drive to it? (Individual, Miami, AZ - #A880.20210)

Making our forests only accessible to hikers is against the disabilities act! The old, frail, young and disabled enjoy access to forests via 4-wheel drive vehicles. Close off these roads and they are being denied access! (Individual, No Address - #A296.20210)

Remember the American's with disability act requires accommodations, and just what is a handicap? My hip limits how far I can walk to 3-4 miles and an ATV would give me access to a greater amount of land. (Individual, No Address - #A917.20210)

I agree that roads should not be built for the sole satisfaction of transportation, but I do not agree that any roads that have already been built should be closed. These roads provide a way for people who enjoy the outdoors to reach those sites and sounds. Why not park and walk in? Well what about our commitment to our disabled persons of this land who can't walk, or can't walk very far. As I recall there is an act in place that provides for these citizens, the Americans with Disabilities Act (ADA). These people need some sort of transportation to get there so they are not discriminated against. (Individual, No Address - #A10448.20210)

I am almost 80 years old and in my later years I have resorted to traveling the mountain jeep trails in my 4 wheel Jimmy. The roads have been there for centuries and seem none the worse for wear. Many are logging and mining roads and without travel will take hundreds of years to cover over (remains of the Santa Fe and Oregon Trails are obvious). Many people like me have dedicated much of their spare time to the mountains and have been good stewards of the land and now we are being eliminated because of our age (which seems to me is a violation of the Disabilities Act). (Individual, Longmont, CO - #A17891.20210)

The Americans With Disabilities Act passed in 1990 has provisions requiring equal access for all Americans. If there are no roads into the National Forests, there is no access. If the existing roads are destroyed, as they have been under the previous administration, existing access into National Forests is reduced. If restrictions on motorized transport into federal lands are levied by bureaucratic fiat, access is reduced. If logging has been systematically shut down in the National Forests, no new roads will be cut, and no new access into those forests for the disabled will be created. The actions that limit the access of all Americans into federal lands also limit disabled access, and are therefore illegal under federal law. (Individual, No Address - #A26180.20210)

### TO AVOID THE THREAT OF LITIGATION

I realize that law suits and threat of law suit have forced you to manage the forest by court rather than by what is learned in training. But, if the money is spent for the few that use the wilderness with the exclusion of the old and infirm, maybe a new set of law suits are in order. (Individual, No Address - #A4560.10159)

## Clean Air Act

### 136. Public Concern: The Forest Service should comply with the Clean Air Act.

In some cases, the Forest Service has legal obligations in management decisions (e.g., in those touching the Endangered Species Act, and the Clean Air Act and Water Acts, in addition to relevant local laws and ordinances). (Individual, Bozeman, MT - #A20412.20200)

## Clean Water Act

### 137. Public Concern: The Forest Service should comply with the Clean Water Act.

#### BY INCLUDING IN MANAGEMENT PLANS ROADS THAT CROSS STREAMS OR WETLANDS

The Clean Water Act (copy of their acknowledgement included) was completely ignored. No permits were even applied for. Roads that cross streams or wetlands have to be included in the management plan. It would be very difficult to consider closing or opening any of the roads remaining without considering that water is involved. If permits are to be issued for new road construction, including the wilderness, or any reason then the laws that apply should be enforced on an even playing field. (Individual, Rock Springs, WY - #A5695.20221)

#### BY OBTAINING THE NECESSARY PERMITS AND EXEMPTIONS FOR CLOSING FOREST SYSTEM ROADS

Of the road systems closed wholesale in the Bridger Teton, Medicine Bow-Routt, and Wasatch-Cache National Forests over an extended number of years, no record can be found of a national permit, exemption, or state permit filed for or extended from the Corps of Engineers for stream channel work. Hundreds of access ways (thousands nationally) were closed using ground disturbance methods in or near navigable waters simultaneously—especially between June 1996 and October 1999.

According to Jim Furnish (May 14, 2001), the USFS “did not obtain, nor is required to obtain a permit” mainly because the long-term effect is an increase in water quality (never stating exactly by what authority). Region 8 EPA (July 11, 2001) states that “we are not aware of laws that authorize non-compliance with the Clean Water Act”.

This was followed (July 19, 2001) from EPA with, “Section 404(f) of the Clean Water Act addresses exemptions for forest roads and the regulations at 40 CFR 232.3 may be relevant as well. 40 CFR 232.3 (c)(6) in particular, deals with construction and maintenance of forest roads and might be useful. I would also like to point out that Section 404 (r) of the Clean Water Act provides that certain Congressionally authorized projects do not need a permit if certain conditions are met.” The USFS has never expressly stated what authorities they operated under as it concerns Jim Furnish’s statement of May 14, 2001.

Then (August 3, 2001) the Corps of Engineers, Omaha District stated, “Omaha District has searched its records and does not have any record indicating that Bridger Teton National Forest applied for and/or was issued exemptions or national permits...” And finally on August 30, 2001, in response to “copies of all documents for and issues showing **exemptions** or national permits issued to the Bridger Teton National Forest beginning from Jan. 1, 1984 to Jan 1, 2001 showing authorization for non-compliance of the Clean Water Act”, the Forest Service, Region 4, responded with “...we are providing you with a no records determination.” The August 30, 2001 letter was stated as the final word, subject to a “right of appeal”.

It is true that records regarded are primarily from the Medicine Bow-Routt, Bridger-Teton, and Wasatch-Cache national forests, however, this probably runs true throughout all 58.5 million acres of inventoried “roadless” areas and other areas of approximately 192 million acres comprising the National Forest

System. The point being, the Clean Water Act is a law for everyone to abide by, not just the private sector of business or landowner. Competing values aside, the USFS is not above the law. (Individual, Rock Springs, WY - #A15658.20221)

**138. Public Concern: The Forest Service should comply with the Clean Water Act and the Endangered Species Act.**

**BY NOT REMOVING TIMBER OR BUILDING ROADS**

The 10 questions listed as part of the Public Comment for Roadless Area Conservation avoided mentioning Federal Laws such as the CWA and the ESA. In order to meet the CWA requirement to maintain the physical and biological integrity of the Nation's waters that are in the roadless area watersheds, and to meet all ESA requirements, logging and road building should not be allowed in the roadless areas. (Organization, Coeur d'Alene, ID - #A17112.20200)

**139. Public Concern: The Forest Service should integrate the Clean Water Act and the Endangered Species Act early in the forest planning process.**

In addition to the traditional multiple use values that have guided national forest planning since before NFMA was enacted, I believe we would be well served by a constructive integration of ESA and CWA into the early forest planning process. (Individual, Spokane, WA - #A17819.20200)

**140. Public Concern: The Forest Service should not use the Clean Water Action Plan as a guideline for roadless area management.**

**UNTIL CURRENT LITIGATION OVER ITS IMPLEMENTATION HAS BEEN SETTLED AND ITS IMPACTS HAVE BEEN ANALYZED UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT**

The Clean Water Action Plan (CWAP) has been cited as a reason 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 they 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. (Organization, Albuquerque, NM - #A8813.20203)

*Conservation and Reinvestment Act*

**141. Public Concern: The Forest Service should encourage the Senate to pass the Conservation and Reinvestment Act.**

**IF STAKEHOLDERS ARE NOT ALLOWED TO REMOVE TIMBER**

If private or Tribal forest surrounding or inside U.S. State and Federal Forest remain dead locked to the extent the owner/tribe will more than likely never be allowed to harvest their timber, which presently continues to be reality, even though the loss of 7-million-acres in the west is looming in the eyes of us who still have some common sense left, and in the future other private forest will more than likely burn, because USDA CLAIMS no one wants roads, helicopters, cable systems, etc. in the "ROADLESS AREAS;" then by all means, encourage the Senate to PASS CARA, encourage Americans who own private forest to sell to the government, compensate the Indian Tribes for the loss of timber harvest or farmers due to the lack of water as is the case of Klamath basin, allow counties to exchange funding they're entitled to, without the consideration of the county or states local economy, adjustment for inflation, federal spending, governmental control and monopolization of all privately owned forest or "SO CALLED SENSITIVE AREAS" in the 11 Western States, which by the way, CARA affects more than eastern states. (Individual, Jefferson, OR - #A775.30200)

**142. Public Concern: The Forest Service should delay any decisions regarding the Roadless Area Conservation Rule until the Senate votes on its version of the Conservation and Reinvestment Act.**

Endangered Species Act was never intended as the United States Department of Agriculture Forest Service, DEO [Department of Energy], BLM [Bureau of Land Management], DOI [Department of Interior] Fish and Wildlife Service, IUCN [International Union for Conservation of Nature and Natural Resources], Groups, Associations, Societies or individuals private tool in order to control the forest, farms or grasslands in the U.S. Therefore, ESA [Endangered Species Act] has direct relationship to past and present policies regarding roadless wilderness. CARA [Conservation And Reinvestment Act] as the funding mechanism for “new” property acquisition is passed into law will directly affect present roadless wilderness areas and future designations of “new” lands because private lands within the national forest could be purchased, thereby eliminating existing roads and shelving the construction of new roads in order to gain access to those forest previously privately owned. Yet without access to all national forest “wilderness areas,” in order to thin the forest, wildfires will continue to deplete wildlife sustainable habitat, and natural resources, i.e., lumber. CARA has passed the house of Representatives with a comfortable margin of victory, and appears headed for passage in the Senate. Until the Senate passes its version of CARA and once and for all either ratifies or reinforces the present ESA, roadless wilderness decisions, including former President Clinton’s roadless wilderness decisions announced in January 2001, any or all decisions should be postponed. (Individual, Jefferson, OR - #A775.20000)

*Enabling Act*

**143. Public Concern: The Forest Service should comply with the Enabling Act.**

**BY PROVIDING A CONTINUOUS SUPPLY OF TIMBER AND PRESERVING THE WATERSHED**

The primary purposes of the USFS as stated in the Enabling Act are: (1) to provide a continuous supply of timber to the American people and (2) to preserve the watershed. These two purposes were confirmed by the US Supreme Court as the primary purposes of the USFS and that all other purposes are secondary and of less importance. (Individual, Ruidoso, NM - #A17775.20200)

*Endangered Species Act*

**144. Public Concern: The Forest Service should comply with the Endangered Species Act.**

Local forest planning is important for specific management decisions but it should be strictly subject to national policy, especially compliance with NEPA [National Environmental Policy Act] and the ESA [Endangered Species Act]. (Individual, Black Mountain, NC - #A707.20000)

**145. Public Concern: The Forest Service should consider that the Roadless Area Conservation Rule will jeopardize compliance with the Endangered Species Act.**

**BECAUSE IT WILL REDUCE ACCESS FOR REGULAR INSPECTION FOR DISEASES AND PESTS**

It is clear that the ESA is seriously jeopardized by the current roadless policy because access to the interior of the roadless areas compromises regular inspection for diseases and pests that may destroy endangered or threatened species. (Individual, South Royalton, VT - #A13393.20222)

**146. Public Concern: The Forest Service should clarify the relationship of the Endangered Species Act to international environmental legislation.**

Endangered Species Act is a concrete example of the authoritarian power of international treaties over Americans’ rights and property.

Read U.S. Code 16, Sec. 1531 (a)(4) Congressional Findings and Declaration of Purposes and Policy. You will find that the Endangered Species Act is conformable to and in accordance with: (A) migratory bird treaties with Canada and Mexico; (B) the Migratory and Endangered Bird Treaty with Japan; (C) the Convention on Nature Protection and Wildlife Preservation in the Western Hemisphere; (D) the International Convention for the Northwest Atlantic Fisheries; (E) the International Convention for the High Seas Fisheries of the North Pacific Ocean; (F) the Convention on International Trade in Endangered Species of Wild Fauna and Flora; and (G) other international agreements in a mockery of the “advice and consent” responsibility placed upon the Senate by our constitution, the U.S. Senate ratified 34 international treaties without debate, without a vote, and almost without notice during the 106th Congress. (Individual, Jefferson, OR - #A775.20222)

## **147. Public Concern: The Endangered Species Act should be revised.**

### **BECAUSE IT DOES NOT STOP EVOLUTION**

Obviously, this would require a complex answer and I would hope that the Forest Service knows this in greater detail than I do, but common sense tells me that this entails balancing the needs of humans with those of other animals on U.S. Forest lands. The gauges for making this balance are difficult to come by, but I suspect that the Endangered Species Act is one gauge that has been used to protect the interests of the other animals. The problem with using such narrow gauges, as has been applied extensively in Klamath County, is that there likely have been more extinct species in the “history” of this planet only in the last 200,000 years than the total number of species that exist now, not to mention the previous 3.8 billion years of this planet’s “history”. What is fallaciously presumed in the Endangered Species Act and by radical environmentalists that interpret this Act is that evolution of all animal species stopped on the date of the inception of this Act. What we are witnessing before our eyes is survival of the fittest and evolution itself. I see this everyday as bacteria develop resistance to antibiotics that they are presented when humans are being invaded by them and I treat these humans. This is not to say that the U.S. Forest should be cut and plowed down because there is a basic human need to seek solace in the wilderness, and there needs to be a basic respect for other animals and organisms. Nevertheless, there is only so much that human interaction can do to stop evolution. (Individual, Klamath Falls, OR - #A6931.53200)

### **BECAUSE IT HARMS RESOURCE INDUSTRIES, RECREATION, AND AGRICULTURE**

CARA [Conservation And Reinvestment Act], if it passes, will be the mechanism providing USDA Forest Service funding for forest/land acquisition, Endangered Species Act gives USDA Forest Service the license to designate any area sensitive if an endangered species is found on any particular lands. With 1,243 species on the endangered list and an additional 2,000 under consideration, the future of private forests, farms and grasslands are uncertain. I would not encourage USDA to visit my rural community or my local privately owned forest, many that allow hunting, off road, etc., a benefit to the National and State Forest of the 11 western states. Yet more forests managed by USDA Forest Service are sought after. USDA Forest Service presently has not the funding to adequately manage the national forest at present. There has to be a balance. The government cannot own everything. Corporate America and international entities already have a big piece of America. Is it the intention of the USDA Forest Service in association with U.S. DOE [Department of Energy] (EIS No. 010222, Fish and Wildlife Mitigation and Recovery Draft, DOE [Department of Energy], Fish and Wildlife Implementation Plan) BLM [Bureau of Land Management], International Union for Conservation of Nature and Natural Resources (IUCN) . . . , Switzerland and Department of Interior Fish and Wildlife Service to continue using the Endangered Species Act to systematically deplete resources privately owned forests, farms and grasslands represent for the economy by declaring areas in the west sensitive for habitat or the home of one of the 1,243 species? While endangered species are being protected, is the death of other species now acceptable or destruction of entire farming communities as is the present situation in Klamath Basin? (Individual, Jefferson, OR - #A775.20222)

ESA has not been authorized since 1992 but Congress has been making appropriations for ESA every year. Forests have been closed, farms have been threatened by wildlife refuges. All of this without being officially reauthorized.

The Klamath Basin is the result of an ESA citizen’s lawsuit.

Somebody needs to be held accountable for economic, social, and cultural damages and human suffering caused by ESA actions.

Rural America is out of work, and thousands of farmers, loggers, miners, ranchers and people working in related businesses have been put out of work due to ESA Actions and ESA protections.

Our economic way of life is being destroyed. Natural Resources need to be used not just for oil energy, but mining, logging, grazing, etc. We need to work the land to produce raw materials for American industries and to produce food for our tables. (Individual, Eckert, CO - #A28671.20222)

#### **BECAUSE IT IS BEING USED BY GROUPS AS A TOOL AGAINST TRADITIONAL USES OF FOREST LANDS**

Congress passed the Endangered Species Act of 1973 into law in an effort to ensure the long-term solution, which satisfied the needs of both man and his surroundings. The Endangered Species Act was a noble endeavor in both concept and theory. Provide protection to the plant and animal species threatened with extinction, or endangered by the spread of the human population throughout the country. On its face the Endangered Species Act appeared to be a “common sense” piece of legislation. The idea was that there was more than enough room to go around and that man could easily coexist with his natural surroundings. America is a big place after all. Yet things are rarely what they seem. Over the years the Endangered Species Act, like the species it purports to “protect,” continued to “evolve.” At the behest of the Green Advocacy Groups, amendments to the original legislation along with creative interpretation by an activist judiciary have turned the law into little more than a weapon to be used against business, development interest, property owners and recreational groups...to name but a few. Today, once the Endangered Species Act is invoked in a land use battle, the battle is almost always over. How many among us can afford to go up against the near-limitless resources of the federal government, the GAGs [Green Advocacy Groups], and often complicit media effort combined? (Individual, Jefferson, OR - #A775.20222)

Property rights advocates have long contended environmentalists use the Endangered Species Act (ESA) to further such unrelated interests as limiting population sprawl, restricting natural resources recovery, and restricting the construction of new roads, airports, and dams. The National Wilderness Institute (NWI) notes no species have ever been removed from the endangered species list due to actions taken under the Endangered Species Act. Although NWI has filed many court actions and has fought diligently for the protection of endangered species, it recognizes that many species that are not threatened have been improperly added to the list. (Individual, Jefferson, OR - #A775.20222)

The most insidious weapon in the environmentalists’ hands is the Endangered Species Act. It is destroying farmers, ranchers, commercial fisherman, loggers, the petroleum industry, motorized recreation industry, and other recreational pursuits. Thousands upon thousands of people are losing their farms, ranches and jobs. This again is an underlying attempt by the Globalists to destroy our ability to produce in order to make us dependent on the U.N. (Individual, Sedona, AZ - #A1566.20222)

#### **BECAUSE IT HAS NOT BEEN ESTABLISHED LONG ENOUGH TO OBTAIN THE NECESSARY DATA TO DECLARE SOME SPECIES ENDANGERED**

The Endangered Species Act may be correct and needed but the management of the intent is wrong. Every species has its cycle from maximum population to minimum population. The ESA has not been established long enough to obtain the necessary data to declare some of these species endangered. Some of these declarations may affect forest health. (Individual, Klamath Falls, OR - #A8809.20222)

#### **TO ELIMINATE THE PRINCIPLE THAT HABITAT IS MORE IMPORTANT THAN USE**

Join the people in demanding hearty revision of the ESA.

Eliminate the goal, concept, or operational principle that habitat is more important than use. They are both important. (Individual, Greeley, CO - #A28995.53100)

#### **TO ALLOW AN AUTOMATIC EXEMPTION TO PROTECT LIFE AND PROPERTY**

ESA should be reformed or repealed the worst ESA travesty yet is the death of the four young firefighters in Washington. Due to endangered fish in the Chewick River the Forest Service) delayed for

several hours to take water from the river to drop on the fire. If Congress cannot reform the ESA to protect human life they should repeal it. This should never have happened, and who is to be held accountable? There should be an automatic exemption to protect human life and property. (Individual, Eckert, CO - #A28671.20222)

The ESA should be reformed or repealed. The worst ESA travesty yet is the death of the four young fire fighters in Washington due to endangered fish and Chewuk River. The Forest Service delayed several hours to deliver water on the fire, thus causing the death of these four fire fighters. (Individual, Cedaredge, CO - #A21879.20222)

**148. Public Concern: The Endangered Species Act should be eliminated in its current form.**

**BECAUSE OF ITS IMPACT ON PRIVATE PROPERTY RIGHTS**

ESA [Endangered Species Act] and International ESA policies combine together in a manner that allows others to decide the fate of your private property if someone trespassing discovers an endangered species, which by the way, may increase to 3,243 species from the present 1,243 critters and varmints since ESA's inception and only nine species have been taken off due to their recovery. The reality of the ESA today is not about protection. It is about control of a population through the use of its land and natural resources.

In short, proposals by both Democratic and Republican officials are all over the boards everywhere but where they need to be-De-finding and eliminating the ESA in its current form from the law books of the American judicial system. When people are forced by our government to eradicate what could very well be truly endangered species from their own property in order to protect both their rights and its value, you have a problem that runs far deeper than a piece of legislation. You have a government and related NGOs (non-governmental organizations) that are acting against the will of the people they serve, to the detriment of the species they purport to protect. (Individual, Jefferson, OR - #A777.20222)

**BECAUSE OF ITS ROLE IN CLOSING ROADS**

We already have millions of acres locked up in wilderness Areas, National Parks, Refuges, study areas etc. and far too many roads locked up because of the Endangered Species Act. (Individual, Kalispell, MT - #A1071.20222)

**BECAUSE THE SCIENCE IS FLAWED**

Also, the Endangered Species Act is flawed, and many land closures are based on "junk" science, with no scientific proof that certain areas should be closed to human access. (Individual, San Diego, CA - #A6766.20222)

**149. Public Concern: The Forest Service should support legislation that prevents litigation over the Endangered Species Act and reimbursement of legal fees.**

Remove the weapon used by our "Environmental Extortionist". Have legislation to prevent any lawsuits in regard to the Endangered Species Act or from these groups collecting reimbursement of legal fees or damages from the USFS. (Individual, Lawrenceville, GA - #A6196.15000)

Seek reform of the endangered species act so we can save our forests instead of litigate. (Individual, Canby, OR - #A15507.20222)

Reductions in the use of even-age and other habitat management practices on National Forests are due primarily to obstructionist legal challenges. These legal challenges are commonly based on existing Forest Service Land and Resource Management Planning Regulations. The wording of some of these regulations and judicial interpretation thereof can place sometimes-unreasonable requirements on the agency, thereby exacerbating efforts to implement needed habitat management projects.

Specifically, many suits allege that the Forest Service hasn't adequately monitored populations of certain species to ascertain whether or not these populations are viable, a requirement under the current interpretation of existing planning regulations. Given that these lists of species, which vary by National Forest, can include several dozen to almost 1,000 species, the population monitoring necessary to meet this viability requirement can be both technically and fiscally impractical, if not impossible. I would even go as far as to suggest that legislation be introduced to prevent such groups from collecting damages of legal fees in association with any endangered species. If our concerned environmentalists had to pay their own fees I wonder how often we would see a suit brought against USFS? Maybe Chief Bosworth you should lobby for legislation to save the taxpayers and the budget of USFS some money. (Individual, Lawrenceville, GA - #A6256.16120)

**ENCOURAGE THE REPEAL OF THE CITIZEN SUIT PROVISION OF THE ENDANGERED SPECIES ACT**

**Repeal the "citizen suit" provision** of the Endangered Species Act, and then **repeal the Endangered Species Act**. When regulations are issued and enforced as a result of bureaucratic interpretation which is inconsistent with law, or which result from a lawsuit filed against a government agency by an environmental extremist organization or any of its members, the persons and organization involved need to receive a large fine and considerable time in prison. Personal and organizational responsibility in following the law will go a long way toward protecting access to, and unfettered use of, private property. (Individual, Fredericktown, MO - #A11981.20222)

**150. Public Concern: The Forest Service should consider that protection of unroaded areas on federal lands has provided state and private lands more latitude for management under the Endangered Species Act.**

I would also point out that protection of unroaded areas on federal lands has provided state and private lands more latitude for management under the Endangered Species Act. Protection of federal lands has consistently been cited by the U.S. Fish and Wildlife Service and the Department of Interior as a reason to have less stringent protections of habitats of Threatened and Endangered species on nonfederal ownerships in Washington State. Thus private individuals and state trustees (beneficiaries of Washington DNR-managed lands) benefit directly from habitat conserved on federal lands. (Individual, Olympia, WA - #A30305.20222)

*Federal Advisory Committee Act*

**151. Public Concern: The Forest Service should comply with the Federal Advisory Committee Act.**

**BY AVOIDING CLOSED-DOOR SESSIONS WITH TARGETED GROUPS**

This Initiative was constructed, we believe, in closed-door sessions with radical environmentalists—a FACA violation. It violates the mandate of the USFS—to provide the greatest use for the greatest number—and probably the ADA. It shuts a huge percentage of our 'public' lands off to the public. (Individual, Cedaredge, CO - #A10364.20000)

**152. Public Concern: The Forest Service should seek removal of the bureaucratic requirements of the Federal Advisory Committee Act.**

**TO FACILITATE FORMATION OF FOREST-LEVEL ADVISORY COMMITTEES**

The most effective, proven tool for working with various groups to ensure that concerns about roadless values are heard and addressed through a fair and open process is the NFMA-mandated forest land and resource management planning process. The Forest Service must allow all interested parties to offer their views and to help define the issues without being constrained by this input.

Establishing forest-level advisory committees as envisioned by NFMA can strengthen this process. Removing the bureaucratic, straitjacket requirements of the Federal Advisory Committee Act would facilitate this approach. Meaningful, productive relationships evolve from the contacts on the individual National Forests. This is where specifics can best be applied on the ground to work to the benefits of

local individuals, the community, the state and the nation. (Business or Association, Portland, OR - #A19004.20201)

## *Forest and Rangeland Renewable Resource Planning Act*

### **153. Public Concern: The Forest Service should comply with the Forest and Rangeland Renewable Resource Planning Act.**

#### **BY ADDRESSING ROADLESS AREA MANAGEMENT IN THE FOREST PLANNING PROCESS**

To be consistent with the Forest and Rangeland Renewable Resource Planning Act of 1974 as amended (hereafter "RPA"); the National Forest Management Act (hereafter "NFMA"); and, the Multiple Use Sustained Yield Act (hereafter "MUSY"), the Forest Service should address the roadless management issues through the comprehensive planning process of the Land and Resource Management Plans (hereafter "LRMPS") process. By examining one issue (roadless management) in isolation, the resulting management policies will not provide for multiple use and sustained yield in a coordinated and consistent manner.

The LRMP process was designed to guide all natural resources management activities and in turn determine resource management activities in turn determining resource management practices, levels of resource production and management, and suitability of lands, all in a comprehensive approach that was responsible to changing social and economic demands.

The nationwide approach to roadless management runs counter to the goal of a coordinated, integrated, and consistent planning process. It is our recommendation that the roadless issue be addressed in the LRMP process wherein all resources outputs are balanced to determine the maximum long term net public benefits. (Elected Official, Douglas County, OR - #A11811.13110)

#### **BY NOT MANAGING ROADLESS AREAS AS DE FACTO WILDERNESS**

We note that the adoption of the proposed rule to temporarily suspend road construction and reconstruction within National Forest System roadless areas is viewed as critical to preserve land and resource management options. (63 F.R. 9980-02). However, this preservation of management option for the roadless areas is in direct contradiction to the Congressional intent relative to roadless areas as expressed during the 1981 designation of wilderness in California. We note the following statement in the Committee Report:

The fact that the wilderness option for the roadless areas will be considered in future planning raises the hypothetical argument that the areas therefore must be managed so as to preserve their wilderness attributes so that these may be considered in the future. Such an interpretation, however, would result in all roadless areas being kept in de facto wilderness for a succession of future planning processes. SUCH AN INTERPRETATION IS OBVIOUSLY INCORRECT, AND IF APPLIED, WOULD COMPLETELY FRUSTRATE THE ORDERLY MANAGEMENT OF NONWILDERNESS LANDS AND THE GOALS OF THE FOREST AND RANGELAND RENEWABLE RESOURCE PLANNING ACT. (Committee on Interior and Insular Affairs, 97th Cong. 1st Sess. Report No. 97-181, p.45) (emphasis added). SEE ALSO Committee on Energy and Natural Resource, 96th Cong. 2d Sess., Report No. 96-914, p. 26.

As noted above, the preservation of roadless areas to maintain options for future plans is inconsistent with the Forest and Rangeland Renewable Resources Planning Act as well as the various wilderness acts. (Elected Official, Douglas County, OR - #A11811.12460)

## *Knutson-Vandenberg Act*

### **154. Public Concern: The Knutson-Vandenberg Act should be repealed.**

#### **BECAUSE IT AGGRAVATES CONFLICTING INTERESTS**

The conflicting interests that are mentioned in several of the questions are, in part, due to the way the Knutson-Vandenberg Act has intermeshed local incentives with profits from national lands. This

outdated law creates many of these conflicts. It allows the best interest of the forest to be weighed against local county needs for bridges and schools, local businesses who are partly supported by the harvest of forests, and the numerous support functions that go along with logging and milling.

Consider for a moment if the Knutson-Vandenberg Act were repealed, that ALL revenue generated off of national lands was sent to the general treasury to benefit everyone (not just the local county), and that any harvest or extraction from national lands was strictly a forest service function, using forest service equipment, then I think you would get a picture of how differently this issue would become. . . . The repeal of the Knutson-Vandenberg Act is likely 'wishful' thinking, but I fail to see the logic that allows one county to benefit over another, simply because national land happens to be in its borders. Perhaps some compromise of locking in a fee that the federal government would pay to offset local county revenue that would be a flat fee per acre could be worked out. I am pessimistic however as I believe as long as there remains a financial incentive to cut trees, that no forest will ever be truly safe. (Individual, No Address - #A3649.20200)

## *Mining Laws General*

### **155. Public Concern: The Forest Service should recognize its legal obligation to maintain roaded access for mineral exploration and development.**

#### **AS REQUIRED BY MULTIPLE LAWS AND REGULATORY ACTS**

Apart from the general inadequacies of the rulemakings related to roadless areas, e.g., Land and Resource Management Planning Rule, 65 Fed. Reg. 67514, (November 9, 2000); Road Management and Transportation System Rule, 66 Fed. Reg. 3206 (January 12, 2001); Forest Transportation System Administrative Policy, 66 Fed. Reg. 3218 (January 12, 2001); and Roadless Area Conservation Rule, 66 Fed. Reg. 3244 (January 12, 2001), as applied to both federal and private minerals located within or nearby the National Forest System, these rules fail to properly consider and account for the public laws that specifically control access and development of minerals on public lands. Whatever mandate, or authority, the Forest Service believes it can derive from the laws it administers generally for activities that affect surface resources within the National Forest Service System, they do not supercede, or override, the more specific mandates and requirements of the mineral laws. For example, the Mining Law of 1872, 30 U.S.C. 22 et seq., establishes the right to access public lands to explore and develop locatable minerals on public lands, and the Forest Service cannot materially interfere with prospecting, mining, and other incidental uses on those lands in the course of its management of surface resources. Likewise, the disposition of solid minerals subject to the leasing laws cannot be impaired by unilateral action by the Forest Service under the guise of its general authority to manage surface resources within the National Forest System.

Again, by way of example, the disposition and development of federal coal under National Forest Lands is subject to the Mineral Leasing Act of 1920, as amended, 30 U.S.C. 181 et seq., and the Surface Mining Control and Reclamation Act of 1977 (SMCRA), 30 U.S.C. 1201 et seq. These laws establish specific land use planning considerations for the availability of federal coal resources. These specific provisions control and cannot be superceded by Forest Service edicts or rules purportedly taken pursuant to the National Forest Management Act (NFMA), 16 U.S.C. "1601-1614, Multiple Use and Sustained-Yield Act of 1960 (MUSYA), 16 U.S.C. " 528-531, or the Organic Administration Act of 1897, 30 Stat. 11 (June 4, 1897). Rather, the Forest Service's obligation, and the Secretary of Interior's as well for that matter, is to assure that the Forest Service's actions conform to the specific laws providing for access and development of the mineral resources within the National Forest System.

Our review of the records developed to support the Forest Service's rules for roadless areas are shockingly devoid of any indication that these considerations were part of its decision making. Similarly, there is no indication that the Bureau of Land Management performed its obligations in assuring that these rules comport, and not interfere, with the Secretary of the Interior's obligations under our Nation's mineral laws. The National Mining Association was prepared to bring legal action to obtain appropriate relief to bar the application of the rules to mineral activities in light of these specific, as well as other general, infirmities with the rules. However, NMA decided to refrain from such action in light of the agency's announcement to review the rules.

We see this as an opportunity for the Forest Service to cure the unlawfulness of these rules as applied to mineral development within the National Forest System. In the meantime, we request that the Forest Service refrain from applying the rules in a manner that interferes with the exploration and development activities that are the subject of the mineral laws.

Mining is unique, because federally owned minerals are primarily managed by the Department of Interior not the Forest Service. As such, the Forest Service has a limited role in the regulation of mineral resources. For mineral activity on Forest Service lands, the appropriate role of the local forest planning in evaluating protection and management of inventoried roadless areas is defined not only by NFMA but also other statutes particular to mineral development. Among those statutes upon which the agency must rely in the course of its planning process are: SMCRA; Federal Coal Leasing Amendments Act of 1975 (FCLAA) Pub.L.No. 94377, 90 Stat. 1083 (1976); Mining and Minerals Act of 1970 (30 U.S.C. 21a); Mining Law of 1872.

#### The Forest Service Only Has Limited Authority Over Minerals Governed by the 1872 Mining Law

The Forest Service only has limited regulatory authority over mineral resources governed by the 1872 Mining Law, as amended. This limited authority simply does not permit designation of roadless areas in a manner that unreasonably interferes with exploration for and development of minerals.

The Mining Law allows for “A free and open exploration and purchase” of “all valuable mineral deposits in lands belonging to the United States.” 30 U.S.C. [section] 22. Congress established the National Forests through the Organic Administration Act of 1897, 30 Stat. 11 (Jun. 4, 1897), with administrative authority originally vested in the Department of the Interior. In 1905, Congress transferred from the Interior Department to the Department of Agriculture the power to execute or cause to be executed all laws affecting public lands in the National Forests, but the 1905 Act limited that authority by excepting such laws as affect the surveying, prospecting, locating, appropriating, entering, relinquishing, reconveying, certifying, or patenting of any such lands.” 16 U.S.C. [section] 472; 30 Stat. 628 (Feb. 1, 1905). For decades, this qualification has been construed consistently as withholding administrative power over locatable mineral exploration and mining activity on National Forest lands from the Department of Agriculture. See, e.g., H.H. Yard, 38 Pub. Lands Dec. 59, 61-65, 1909 WL 936 (D.O.I. July 3, 1909) (stating that the Transfer Act of 1905 recognized the right, authority, power, and jurisdiction [over surveying, entering, patenting, prospecting, and appropriating] as already existent and vested and declares that such power and authority shall remain where now seated, viz: with the Interior Department.”); Apex and Extralateral Rights Issues Raised By The Stillwater Mineral Patent, 93 Interior Dec. 369, 384 n. 2, 1986 WL 222959 (D.O.I. Apr. 18, 1986) (The Interior Department has the statutory responsibility to administer the Mining Law of 1872 . . . on National Forest lands.”).

Even without consideration of the 1905 Act transfer provisions, the Organic Administration Act of 1897, which remains a central statutory authority for the Forest Service today, does not provide the authority to limit locatable mineral exploration and mining on National Forest Lands. To the contrary, the Act explicitly warns: “nor shall anything herein prohibit any person from entering . . . national forests for all proper and lawful purposes, including that of prospecting, locating and developing mineral resources . . . “ 16 U.S.C. [section] 478. Interpreting the Forest Service’s Organic Act, the U.S. Court of Appeals for the Ninth Circuit recently stated:

The 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)). In addition, the court emphasized that the 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.” Id. Roads are most certainly legitimate uses incident to mining and mill site claims and the prohibition of roads in inventoried roadless areas would be a material interference with mining that is certainly an unreasonable and impermissible encroachment on legitimate uses.

Not only have courts and administrative adjudicatory bodies consistently interpreted the Organic Act of 1897 regarding locatable minerals, but also the Congress, in subsequent grants of authority to the Forest Service, has uniformly done so too. Thus, in 1960, Congress passed MUSYA, which directed the Forest Service to manage the National Forests according to the principles of “multiple use” and “sustained

yield.” Significantly, in the MUSYA, as in the Forest Service’s Organic Act, Congress warned that “nothing” in the Act “shall be construed so as to affect the use or administration of the mineral resources of national forest lands . . . .” 16 U.S.C. [section] 531(a) . . . . Similarly, Congress defined the term “sustained yield” to exclusively refer to the output of the various renewable resources of the national forests . . . .” 16 U.S.C. [section] 531(b) . . . . The Act’s legislative history demonstrates a deliberate effort by Congress to limit Forest Service authority over mineral resources. The House of Representatives Interior Committee Report on the Act states:

It is made clear that nothing in the bill would affect the authority which the Secretary of the Interior has with respect to the mineral resources in the national forest lands. Thus, the bill would not impair mining operations and activities under the authorities which the Secretary of the Interior has with respect to such mineral resources. House Report No. 1551, 1960 U.S.C.C.A.N. 2377 (Apr. 25, 1960).

In 1974, Congress spoke to this principle again when it enacted the Forest and Rangeland Renewable Resources Planning Act, (1974 Renewable Resources Act) 16 U.S.C. [section] 1600-1614.

While authorizing the Forest Service’s land use planning functions, Congress once again made clear, beginning with the 1974 Act’s title (“Renewable Resources”), that minerals were beyond the scope of Forest Service jurisdiction. Significantly, the term “renewable resources” is defined by the 1974 Act “to involve those matters within the scope of responsibilities and authorities of the Forest Service on the date of this Act . . . .” 16 U.S.C. [section] 1610 (emphasis added). Thus, the Act relates back to the MUSYA, which in turn specifically and deliberately exempted minerals from the Forest Service’s discretionary planning and management authority.

In 1976, the NFMA made significant amendments to the 1974 Renewable Resources Act. As in the original 1974 Act, however, the NFMA relates back to the principals of multiple use and sustained yield—applicable only to renewable resources—used by Congress in the MUSYA. See 16 U.S.C. [section] 472a(c). In the 1976 Act’s statement of policy, Congress stated:

To serve the national interest, the renewable resource program must be based on a comprehensive assessment of present and anticipated uses, demand for, and supply of renewable resources from the Nation’s public and private forests and rangelands, through analysis of environmental and economic impacts, coordination of multiple use and sustained yield opportunities as provided in the Multiple-Use Sustained-Yield Act of 1960 . . . . 16 U.S.C. [section] 1600(3) . . . .

Thus, Congress repeatedly has acknowledged through legislation and legislative history that the Forest Service does not have discretionary planning authority over mineral resources on National Forest lands.

The Forest Service’s own regulations recognize this limitation on the Agency’s authority over locatable minerals. Thus, the regulations found at 36 C.F.R. Part 228, promulgated by the Forest Service in 1974 immediately after enactment of the 1974 Renewable Resources Act correctly set the boundaries of the Forest Service’s limited authority over locatable mineral resources and mining activities. 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:

Set 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 . . . . Surely, restrictions on the construction of roads for mineral exploration and 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 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 to roadless areas. See, e.g., 36 C.F.R. [section] 228.4, 228.5. It is important to note that mining roads constructed pursuant to the Part 228 regulations do not become part of the National Forest Road System. Instead, as discussed below, the Part 228 regulations requires that such roads be reclaimed by the operator when they are no longer needed.

In the preamble to the Part 228 regulations, the Forest Service specifically and correctly recognized that it may not adopt surface regulations that impede upon the statutory mining rights:

The Forest Service recognizes that prospectors and miners have a statutory right, not mere privilege, under the 1872 mining law and the Act of June 4, 1897, to go upon and use the open public domain lands of the National Forest System for the purposes of mineral exploration, development and production. Exercise of that right may not be unreasonably restricted. Specific provision has been made in the operating plan approval section of the regulations charging Forest Service administrators with the responsibility to consider the economics of operations, along with the other factors, in determining the reasonableness of the requirements for surface resource protection. 39 Fed. Reg. 31317 (Aug. 28, 1974) (emphasis added).

The Forest Service lacks the authority to designate roadless areas in a manner that impedes longstanding statutory rights to explore the public lands for minerals and develop minerals discovered. The limitations on Forest Service authority with regard to minerals have been recognized and applied consistently.

#### Land Use Planning and The Federal Coal Management Program

In 1979, the Department of Interior (DOI) formally implemented by regulation the Federal Coal Management Program (Coal Program), after the completion of a Programmatic Environmental Impact Statement in which the Forest Service participated. The new Coal Program implemented three newly enacted statutes, the Federal Lands Policy Management Act (FLPMA), FCLAA and SMCRA. See Final Environmental Impact Statement for Federal Coal Management Program at pp.1-15-1-17. The Bureau of Land Management (BLM) has the primary responsibility for administering the Coal Program.

A major component of the Coal Program is comprehensive land use planning, which must be prepared and continually updated. It is only through such planning that federal coal suitable for further leasing consideration is identified. While general land use planning is conducted by BLM under FLPMA or by the Forest Service under NFMA (if National Forest lands are involved), as to coal leasing, both agencies must comply with FCLAA's more specific land use planning requirements. Specifically, section (3)(A)(i) of FCLAA mandates that "no lease sale shall be held unless the lands containing the coal deposits have been included in a comprehensive land use plan and such sale is compatible with such plan." Additional review of federal lands is required by section 522(b) of SMCRA which states the Secretary of the Interior must "review federal lands to determine whether they contain areas unsuitable for all or certain types of certain coal mining."

The FCLAA and SMCRA planning and review requirements are implemented through the Coal Program. See e.g., 43 C.F.R. 3420.1-4(a) (implementing Section (3)(A)(i) of FCLAA, "The Secretary [of Interior] may not hold a lease sale under this part unless the lands containing the coal deposits are included in a comprehensive land use plan or land use analysis.") and 43 C.F.R. 3420.1-4(b)(2) (also implementing Section (3)(A)(i) by specifying that in the case where the surface overlying the subject coal is managed by an agency other than the DOI, that department or agency has responsibility to prepare the land use plan. "The Department of Agriculture or any other agency with surface management authority shall prepare comprehensive land use plans or land use analysis for lands it administers.").

As to SMCRA's unsuitability review, the Coal Program developed specific unsuitability criteria that must be used by BLM or any other surface managing agency conducting the land use planning process. See 43 CFR 3420.1-4(e)(2) ("the Bureau of Land Management or the surface management agency conducting the land use planning **shall, using the unsuitability criteria and procedures** set out in part 3461 of this title, review Federal lands to assess where there are areas unsuitable for all or certain stipulated methods of mining."). The Coal Program regulations, based on SMCRA's unsuitability provisions, establish 20 specific unsuitability screening criteria for making such a determination.

The Forest Service agreed with the Department of the Interior—as a condition of the Memorandum of Understanding (MOU) by which the Secretary delegated the SMCRA federal lands unsuitability review for national forest lands to the Forest Service—to employ the unsuitability criteria and procedures adopted by Interior, by regulation, as parts of the Coal Program. Specifically, the MOU states:

The Secretary of the Interior and the Secretary of Agriculture will review Federal lands under their respective jurisdictions to determine which are unsuitable for all or certain types of surface coal mining operations. Such reviews shall be conducted and such assessments shall be made by the FS and BLM using [the 20 unsuitability] **criteria which have been promulgated as regulations by the Secretary of the Interior as part of the Federal coal management program** (43 CFR part 3400). May 20, 1980 Memorandum of Understanding between the Department of Agriculture and the Department of the

Interior Providing for Coordination of Activities Pursuant to the Federal Coal Management Program. No. 80-SIE-001 (Emphasis added.) More broadly, the MOU is intended to “establish a system for coordination between the BLM and FS on the Federal coal management program.” Id. As far as NMA can establish, the Forest Service has not coordinated with BLM on the interaction of the roadless rule with the Coal Program. NMA submitted Freedom of Information Act requests to both agencies to determine if there was any communication amongst the agencies as to such interaction or more broadly if there were any communications about the impacts of the roadless rule on any mining activities. The response received by NMA indicates no such communications took place. This lack of active consultation conflicts directly with the requirements of the Coal Program. See generally, 43 CFR 3420; 3461.

Thus, the Coal Program implements the planning and review requirements of FCLAA and SMCRA, by establishing a comprehensive federal system for identifying federal coal suitable for further leasing consideration. The Forest Service has no authority to ignore, as it did in the January 12, 2001 final rule, the Coal 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.

In addition, the Coal Program establishes that the local forest planning plays an essential role in determining areas unsuitable for mining, including the construction, reconstruction and maintenance of roads constructed in support of mining operations. In fact, it is the only procedure for determining whether Forest Service lands are suitable for mining. The local forest planning process is the common thread that holds together the three statutes that authorize and regulate coal mining on Forest System lands. These forest plans include reports on the application of the unsuitability criteria. See 43 CFR 3461. If the local forest planning process were bypassed in whole or in part, the Coal Program collapses. Without a predictable mechanism to lease and recover coal underlying Forest Service lands, the Nation’s energy supply could be significantly and seriously affected.

#### Leasable Solid Minerals other than Coal

The role of local forest planning is equally important in the leasing of solid minerals other than coal. 43 C.F.R. 3501.17(a) provides that ABLM will not issue you a permit or lease unless it conforms with the decisions, terms and conditions of an applicable land use plan@ 43 C.F.R. 3501.17(c) states that ABLM will issue permits and leases consistent with any unsuitability designations under part 1600 of this title.@ 43 C.F.R. 1610.7-1(b)(1) declares, The resource management planning process is the chief process by which public land is reviewed for designation as areas unsuitable [for] entry or leasing for mining operations for minerals and materials other than coal under section 601 of the Surface Mining Control and Reclamation Act of 1977.@ 30 U.S.C. 1281. Together these three planning provisions in conjunction with section 601 of SMCRA affirm that the local forest planning process plays an essential role in the evaluation protection and management of inventoried roadless areas on Forest Service lands.

#### January 12, 2001 Rule Not Explicit Enough in Exempting Mineral Activities from its Purview

Section 294.12 of the January 12, 2001 rule prohibits road construction and reconstruction in inventoried roadless areas. One of the exceptions to the general prohibition on roads is contained at section 2914.12 (b)(3) which allows roads “needed pursuant to reserved or outstanding rights or as provided for by statute or treaty.” This vague exception may be intended to address access for mineral exploration and development pursuant to the Mining Law of 1872, the Mineral Leasing Act and other laws, but the rule’s preamble provides little explanation of the exception’s scope. Indeed, statements in the preamble undermine the mining industry’s confidence that this exception will ensure access **via roads**. Specifically, the preamble states:

Access for the exploration of locatable minerals pursuant to the General Mining Law of 1872 is not prohibited by this rule. Nor is reasonable access for the development of valid claims pursuant to the General Mining Law of 1872 prohibited. **In some cases, access other than roads may be adequate for mineral activities. This access may include, but is not limited to, helicopter, road construction or reconstruction, or non-motorized transport.** 66 Fed. Reg. 3253. (Emphasis added.) While aerial access may not be prohibitive in connection with some exploration, we submit that aerial access will be prohibitive, i.e., unreasonable, with respect to essentially all mining activities. While the Forest Service may have more discretion over leasable mineral activities, the exception to the road prohibition would still apply to provide access for such activities to fulfill existing contracts. 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 the 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 of the U.S. Constitution, and any denial or restriction on access for a leasable mineral activity may also constitute a violation of the Contracts Clause of the U.S. Constitution.

The Forest Service must allow road construction for mineral exploration and development as guaranteed by statutory right in the various federal mining and mineral leasing laws. (Business or Association, Washington, D.C. - #A29622.20223)

## *Mining Law of 1872*

### **156. Public Concern: The Forest Service should comply with the Mining Law of 1872.**

The Forest Service should rely on local control and input to determine the best use of forest resources, while conforming to the Mining Law of 1872. (Individual, Aptos, CA - #A16303.20223)

#### **TO REMAIN FREE OF FOREIGN DEPENDENCE ON RAW MATERIALS**

The Mining Law of 1872 should be of prime concern, as our ability to remain free of foreign dependence on raw materials is of utmost importance. (Individual, Aptos, CA - #A16303.20223)

The Forest Service should rely on local control and input to determine the best use of forest resources, while conforming to the Mining Law of 1872. . . . The Forest Service must consider economic factors by law. The Mining Law of 1872 should be of prime concern, as our ability to remain free of foreign dependence on raw materials is of utmost importance. The Forest Service should allow local jurisdictions to make their own decisions on how best to use forest lands because local citizens are affected the most by these decisions. (Individual, Albuquerque, NM - #A10497.15111)

#### **BY MAINTAINING ACCESS FOR MINERAL EXPLORATION AND DEVELOPMENT**

Rights provided under the 1872 Mining Law to explore for and develop minerals cannot be abridged by the adoption of an administrative regulation in the absence of other Congressionally enacted statute granting such specific authority. No such Congressionally-granted authority can be found among the plethora of laws governing the management of federal lands. To the contrary, Congress granted specific protection for the exercise of valid mining rights, as set forth in:

Surface Resources and Multiple Use Act of 1955 30 U.S.C. 612

Multiple-Use Sustained Yield Act of 1960 16 U.S.C. 528

Wilderness Act of 1964 16 U.S.C. 1134

National Forest Management Act 16 U.S.C. 1601-1614

Access to Forest Service lands containing minerals under federal lease is also protected, since the contractually granted right given by the federal government to develop those minerals is dependent upon access necessary to conduct the operation in a safe and prudent manner in accordance with applicable laws, including requirements of OSM [Office of Surface Mining], MSHA [Mine Safety and Health Administration], and other agencies. Subsequent administrative inclusion within a defined roadless area cannot, and should not, infringe on existing rights. (Business or Association, Denver, CO - #A20676.20200)

First and foremost, the Forest Service must review its statutory authority as to whether it can prohibit any specific activities. For example . . . the Forest Service has no statutory authority to prevent access to federal lands pursuant to the Mining Law of 1872. Therefore, arguably, roaded access for mineral development should be expressly allowed. (Business or Association, Spokane, WA - #A17351.20000)

**BY ALLOWING UNRESTRICTED MODES OF TRANSPORTATION**

Mineral entry to public lands, as guaranteed by the 1872 Mining Act, is an act of Congress. The Act is a complete bundle of rights that includes, among other things the construction of access roads for exploration and development, the removal of bulk samples for test milling, and unrestricted modes of transportation to gain access to lands subject to the Act.

This bundle of rights to explore and develop federal minerals cannot be partially extinguished by administratively limiting modes of access, or any other valid rights granted by Congress when it enacted the 1872 Mining Act. (Business or Association, Reno, NV - #A15364.20223)

**BY NOT MATERIALLY INTERFERING WITH PROSPECTING, MINING, OR MINERAL PROCESSING**

Certain other federally owned minerals, e.g., gold and silver, are governed by the laws of location as set forth in the 1872 Mining Law, which predates the establishment of the National Forests (1897). The Mining Law allows for “free and open exploration and purchase” of all valuable mineral deposits in lands belonging to the United States.” 30 U.S.C. [Section] 22. Thus, while the Forest Service may have statutory authority to regulate surface use of the National Forests by holders of unpatented mining claims, that regulation must be reasonable and may not materially interfere with prospecting, mining or mineral processing as guaranteed under the Mining Law on lands open to the public. For a more comprehensive treatment of this issue, we refer you to and hereby incorporate by reference the comments of the National Mining Association. (Business or Association, Denver, CO - #A20676.20223)

**157. Public Concern: The Mining Act of 1872 should be revised.****TO GRANT ROYALTIES AND LEASING FEES TO GOVERNMENT MANAGERS COMMENSURATE WITH THOSE RECEIVED FROM PRIVATELY OWNED LAND**

Mining and the exploitation of non-renewable resources can impose major permanent impacts upon the land. Often these impacts can be localized; but none-the-less should be restrained. The 1872 Mining Act as well as grazing privileges need to be revised to result in the government managers receiving royalties and leasing fees commensurate to if the land was privately owned. National Forests are not intended for being tree farms, mines or cattle pastures. (Individual, Geneva, NE - #A15512.90110)

**158. Public Concern: The Mining Act of 1872 should be repealed.**

The 1872 Mining Act needs to be thrown out as well. (Individual, Boise, ID - #A8715.90720)

*Mining and Mineral Policy Act***159. Public Concern: The Forest Service should comply with the Mining and Mineral Policy Act.****BY MAINTAINING ACCESS TO MINERAL DEPOSITS IN NATIONAL FOREST SYSTEM LANDS**

Creation of vast “roadless” areas is in direct conflict with the Congressional mandate established in the Mining and mineral Policy Act of 1970 (MMPA). MMPA states the following: “The Congress declares that it is the continuing policy of the Federal government in the national interest to foster and encourage private enterprise in: (1) the development of economically sound and stable domestic mining, minerals, metal and mineral reclamation industries; (2) the orderly and economic development of domestic mineral resources, reserves, and reclamation of metals and minerals to help assure satisfaction of industrial, security and environmental needs.” Clearly, maintaining access to mineral deposits in the national forest system is essential to complying with the MMPA’s directive. (Individual, Reno, NV - #A21755.20223)

Compliance with the Mining and Mineral Policy Act of 1970—Creation of vast roadless areas is in direct conflict with the Congressional mandate established in the Mining and Mineral Policy Act of 1970 (MMPA). MMPA states the following: “The Congress declares that it is the continuing policy of the Federal Government in the national interest to foster and encourage private enterprise in: (1) the development of economically sound and stable domestic mining, minerals, metal and mineral

reclamation industries; (2) the orderly and economic development of domestic mineral resources, reserves, and reclamation of metals and minerals to help assure satisfaction of industries, security and environmental needs.” Clearly, maintaining access to mineral deposits in the National Forest System is essential to complying with the MMPA’s directive. (Individual, Reno, NV - #A21377.20200)

## *Multiple Use and Sustained Yield Act*

### **160. Public Concern: The Forest Service should comply with the Multiple Use and Sustained Yield Act.**

#### **BY ENSURING THAT FOREST PLANS ARE IN COMPLIANCE**

The plans must provide for multiple use as provided in The Multiple Use Sustained Yield Act of 1960, taking into account the “coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness”. (Individual, El Dorado, KS - #A5117.20202)

#### **BY MAINTAINING ACCESS**

I am writing to support the Forest Service’s Multiple Use Act. The public lands belong to the public, that’s you and me, not to the federal government. We want access to what is legally ours. (Individual, Seiad Valley, CA - #A1150.20202)

#### **BY PROVIDING FOR A COMBINATION OF USES IN WHATEVER MATRIX WILL BEST MEET THE NEEDS OF THE AMERICAN PEOPLE**

The Multiple Use and Sustained Yield Act of 1960 (16 U.S.C. sec. 528 to 531) provides that our public lands shall be “utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources and related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions, that some land will be for less than all of the resources...”

Your public pronouncements suggest that the new leadership at the Forest Service has lost sight of this legal principle. It is not legally necessary to provide for every use on every acre of our national forests. Rather, it is your legal obligation to meet the needs of the American people, applying whatever combination of uses in whatever matrix is necessary. (Organization, Titusville, NJ - #A6288.20202)

The BLM Strategic Plan FY 2000 to 2005 states that: “To achieve this mission, the Bureau of Land Management follows these principles: Manage natural resources for multiple use and long-term value, recognizing that the mix of permitted and allowable uses will vary from area to area and over time.”

Multiple-use management goals are the only goals that will “best meet the needs” of the public and provide for equal program delivery to all citizens including motorized visitors. All of us have a responsibility to accept and promote diversity of recreation on our public lands. Diversity of recreation opportunities can only be accomplished through management for multiple-uses and reasonable coexistence among visitors.

The significant closing of roads and motorized trails in the project area is not consistent with meeting the needs of the public and the goals of Multiple-Use Management as directed under Federal Land Policy and Management Act of 1976 (FLPMA), Multiple Use Sustained Yield Act of 1960 and P.L. 88-657. The proposed rulemaking combined with the cumulative effects of other proposed and enacted federal land management policies have resulted in a significant reduction of multiple-use and OHV recreation opportunities. We request further evaluation of compliance with multiple-use policies and laws and that the decision support these policies and laws. (Organization, Helena, MT - #A13226.20200)

#### **BY USING MULTIPLE-USE SUSTAINABILITY AS THE STANDARD RATHER THAN ECOSYSTEM SUSTAINABILITY**

The Forest Service asks what characteristic, environment values, social and economic considerations they should consider as it evaluates inventoried roadless areas. ABATE of Illinois asks that the Forest Service return to the 1960 Multiple-Use Sustained Yield Act. This act outlines multi-use sustainability as opposed to the current standard of “ecosystem sustainability”.

The “ecosystem sustainability” standard currently being used could eliminate access of the forest to almost all recreationists, including motorcycles. (Organization, Naperville, IL - #A20342.20202)

**BY GIVING EQUAL CONSIDERATION TO ALL RESOURCES**

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. In explaining the Act’s multiple-use directive, the House Report discusses the “relative values” analysis as follows:

One of the basic concepts of multiple use is that all of these resources in general are entitled to equal consideration, but in particular . . . 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 the range by domestic livestock; in another outdoor recreation or wildlife might dominate. Thus, in particular localities the various resource uses might be given priorities because of particular circumstances. This is the meaning of the last sentence of section 2 of the bill. But no resource would be given a statutory priority over the others. The bill would neither upgrade nor downgrade any resource.

H.R. Rep. No. 1551, 86th Cong., 2d Sess.—(1960), reprinted in 1960 U.S.C.C.A.N. 2377, 2379. Thus, the Forest Service may [not] “upgrade” one resource use, i.e. roadless areas, over all others. (Business or Association, Washington, DC - #A29622.20202)

**161. Public Concern: The Forest Service should clarify how the Roadless Area Conservation Rule complies with the Multiple Use and Sustained Yield Act.**

Modifications to the revised Rule must clearly reflect how the new Rule will provide needed access for congressionally mandated multiple uses. (Business, Colville, WA - #A3362.20202)

**162. Public Concern: The Forest Service should analyze how many wild fires in 2000 occurred in study areas and whether the Multiple Use and Sustained Yield Act has been suspended.**

Check how many of the wild fires of 2000 started in study areas and whether the Multiple Use Act of 1960 has been suspended. (Individual, Corvallis MT - #A8081.20202)

**163. Public Concern: The Forest Service should reevaluate the legal mandate to provide sustained yield of renewable resources.**

I believe it is time to reevaluate the congressional mandate for the Forest Service to provide sustained yield of renewable resources. Past forest management has NOT provided sustained yield as required by the 1960 MUSYA Act, and public forests have been decimated over the past 40 years. (Individual, Olympia, WA - #A4929.20202)

I believe it is time to reevaluate the congressional mandate for the Forest Service to provide sustained yield of renewable resources. Past forest management has not provided sustained yield as required by the 1960 MUSYA Act, and public forests have been decimated over the past 40 years. (Individual, Olympia, WA - #A6262.20202)

***National Forest Protection and Restoration Act***

**164. Public Concern: The Forest Service should comply with the proposed National Forest Protection and Restoration Act.**

**BY ELIMINATING COMMERCIAL LOGGING AND DIVERTING SUBSIDIES TO TRUE RESTORATION**

The ultimate solution lies in the National Forest Protection and Restoration Act, which eliminates commercial logging and diverts subsidies towards true restoration. Only by fully protecting roadless

areas from commercial logging will we manage for “healthy” forests, in the true ecological sense. (Individual, Pullman, WA - #A6234.20200)

#### **TO ELIMINATE FUTURE MANAGEMENT ERRORS**

To eliminate the possibility of future management errors such as this proposal, I have introduced the National Forest Protection and Restoration Act. This Act would eliminate the commercial timber program, and neutralize the commercial incentives that are clearly at work in this reverse-rulemaking proposal. While the Forest Service may feel the need to hand our National Forests over to special interests, I do not share this vision, and will resist your efforts until you move in a new direction. (United States Representative, Georgia, - #A693.20000)

### *Northern Rockies Ecosystem Protection Act*

#### **165. Public Concern: The Forest Service should support the Northern Rockies Ecosystem Protection Act, HR 488.**

##### **TO PROTECT REMAINING PRISTINE LANDS**

I am writing to please urge you to support the Northern Rockies Ecosystem Protection Act, HR 488. With all of the opposition you must be receiving against the act, I’m sure this puts you in a difficult position. But the very few pristine lands we have left in our country deserve to be left alone. (Individual, Alberton, MT - #A11755.20200)

### *Organic Act*

#### **166. Public Concern: The Forest Service should comply with the Organic Act.**

I am more concerned about the trend of the Forest Service in management of the rest of the national forests. I think it is time for the Forest Service to re-examine its origin and purpose. The Organic Act of 1897 affirmed that the forests’ reservations are “for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of the citizens of the United States.”

A plethora of policy and management legislation has confused and complicated administration of the national forests, but none has repealed the basic premise so well stated in 1897. (Individual, Missoula, MT - #A4987.20204)

Before replying specifically to the 10 questions you pose, I believe it is essential first to refer back to the Organic Administration Act.

While the Multiple Use-Sustained Yield Act, Wilderness Act, Forest and Rangeland Renewable Resources Planning Act and National Forest Management Act, among others, modify the Organic act, and while the Clean Water Act, National Environmental Policy Act and Endangered Species Act, among others, affect its implementation, the core provisions of the Organic Act remain controlling law.

In 1978 the U.S. Supreme Court, after reciting the familiar language in the Organic Administration Act setting out the reasons why the national forests were created, added: “They are not parks set aside for nonuse” (United States v. New Mexico), the Wilderness Act did not change this. Quite the opposite, it recognized that to convert national forest land to “nonuse” required a specific act of Congress.

While the Forest Service’s ANPR does a good job summarizing the legal history of the roadless dispute since 1972, I raise the issue of the Organic Administration Act because it remains an essential legal context for any policy decisions about the national forests. (Individual, Spokane, WA - #A17819.20204)

##### **BY MANAGING FOR MULTIPLE USES**

The proposed policy is contrary to the Forest Service’s Organic Act which requires multiple use management of the National Forests. The policy would create de-facto wilderness covering 50-60 million acres. (Individual, Anchorage, AK - #A11831.20204)

## Regulatory Flexibility Act

### 167. Public Concern: The Forest Service should comply with the Regulatory Flexibility Act.

As part of the revised rulemaking process on the Roadless Area Conservation Plan, the Forest Service must comply with regulations under the Regulatory Flexibility Act, Small Business Regulatory Enforcement Fairness Act, and the Benefit Cost Analysis/Unfunded Mandated Reform Act in promulgating the rules under this process. (Business or Association, Salt Lake City, UT - #A28991.20000)

#### BY PROVIDING A REGULATORY FLEXIBILITY ANALYSIS

The Final Rule was issued without benefit of a regulatory flexibility analysis. *66 Fed. Reg. at 3270*. The Department of Agriculture asserted that “Because the roadless rule does not directly regulate small entities, the Department does not believe the Regulatory Flexibility Act applies to this rule.” *Id.* HAI believes that this conclusion is grossly in error. The civil helicopter operators that provide aerial fire suppression and other services to federal land management agencies are all small business organizations, based on Small Business Administration criteria. Because helicopter operations in remote areas are dependent upon ground support teams and vehicles, the Final Rule will have a substantial negative impact on the ability of these small businesses to conduct operations in fulfillment of their contracts with federal land management agencies and others. This rulemaking is incomplete without a regulatory flexibility analysis of its potential economic impact on civil helicopter operators and related small businesses. (Business, Alexandria, VA - #A30200.20217)

The rules should be considered in light of the Regulatory Flexibility Act (5 USC 601 et seq). Under this law which guides broad planning principles and management of the Forest Service road system, this proposed rule must be shown to have no direct or indirect financial or other impact on small businesses. The Forest Service is required to certify that this action will not have a significant economic impact on a substantial number of small entities as defined by the Act. (State Agency, Cheyenne, WY - #A22609.20217)

The Forest Service previously claimed in its proposed rule, “*This proposed rule has been considered in light of the Regulatory Flexibility Act.*” It was further stated that “*the proposed rule primarily involves agency terminology and board principles to guide the planning and management of the Forest Service road system and has no direct or indirect financial or other impact on small businesses. Therefore, it is hereby certified that this action will not have a significant economic impact on a substantial number of small entities as defined by the Act.*” However, the FS also stated that a road constructed into a roadless or unroaded area automatically constitutes a significant impact, requiring an EIS. In other words, any road required for mineral exploration or development will also require an EIS, which could cost millions of dollars. In view of the agency’s purported budgetary woes, we are extremely concerned that the FS will force project proponents to pay for these NEPA analyses. It is unquestionable that the cost of a small exploration program would increase exponentially in conjunction with the required analyses. When one considers the number of mining claims, leases, or prospecting permits within the roadless areas, it is clear that the rule would definitely pose a significant economic impact on a sizable number of small companies. Consequently, we dispute the FS’s finding that its proposed rule would have no significant impact on small business and formally request the agency to conduct a specific analysis to clearly illustrate the genuine impacts of the proposed rule on small business. (Business, Denver, CO - #A29112.20217)

I request that the Forest Service conduct a detailed Regulatory Impact Analysis, including cost-benefit analysis, of any changes to the RACR as required by the Administration Procedures Act and the several Executive Orders and acts of Congress concerning cost-benefit analysis. These analyses must evaluate the net impact of any changes to the rule, and a draft analysis must be made available concurrent with the publication of the Notice of Proposed Rulemaking. I request that these analyses include the value of

ecosystem services provided by intact roadless areas. (Individual, Huntington Woods, MI - #A7706.20209)

Neither the Cost-Benefit analysis nor the Initial Regulatory Flexibility Analysis (IRFA) met the letter or intent of the Regulatory Flexibility Act (RFA), the Small Business Regulatory Enforcement Fairness Act (SBREFA), and the Benefit-Cost Analysis/Unfunded Mandates Reform Act. While much of the IRFA is couched in the proper terms and tone expected of an objective analysis, a knowledgeable reviewer quickly perceives that the document is seriously flawed in many respects. The overall credibility of IRFA is seriously diminished by the notable absence of hard data or facts substantiating the many assumptions used throughout the Final EIS and the January 12 Rule. The full range of management alternatives cannot be determined without a proper IRFA or Cost-Benefit Analysis.

As a result, the USFS has failed to analyze adequately the impact of the January 12 Rule on small entities and did not fairly consider regulatory alternatives that would minimize significant economic impacts to small entities. 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.” (emphasis added) *Southern Offshore Fishing Association v Daley*, 55F. Supp> 2d 1336 (D. FL 1999). (Business or Association, Spokane, WA - #A17351.75900)

#### **BY STATING THE LEGAL BASIS FOR THE PROPOSED ACTION AND DESCRIBING ALTERNATIVES WHICH MINIMIZE THE ECONOMIC IMPACT ON SMALL BUSINESSES**

The IRFA [Initial Regulatory Flexibility Analysis] is deficient in a number of 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 was devoid of any attempt to satisfy either of these statutory requirements. The IRFA did not contain a statement of the legal basis for the proposed action. *The reason is simple: the agency lacked statutory authority for this rulemaking and was fully aware of this fact.*

The RFA further requires that each IRFA contain a description of any significant alternatives to the January 12 Rule which accomplish the stated objectives of applicable statutes and which minimize any significant economic impact of the January 12 Rule on small entities. Again, the IRFA prepared by the USFS was devoid of any attempt to satisfy this requirement.

The alternatives discussed in the preamble to the January 12 Rule are not “alternatives that minimize any significant economic impact of the rule on small entities.” Compliance with the RFA is not achieved by consideration of alternatives that do not meet the requirements of the Act. Accordingly, when the USFS considers alternatives that are more burdensome to small business, they are not valid for RFA purposes. In addition, the USFS did not consider several other obvious alternatives that would accomplish the objectives of the statute but would have protected small entities. These are temporary roads; well-maintained roads; privately maintained roads; and recognized RS 2477 roads. (Business or Association, Spokane, WA - #A17351.20217)

Our members have asked, “Did the USFS avoid the RFA mandated economic impact analysis because it knew that the impact to small businesses and rural communities would be large and devastating?” The USFS use of an all-or-nothing approach in developing the January 12 Rule, when experience, the laws written by Congress, and just plain common sense, dictated a middle ground, make their question pertinent. We believe the courts would agree.

One purpose of the RFA is to make sure reasonable alternatives are considered that avoid economic dislocation to small entities, while still accomplishing the stated regulatory goal. The technical and management capabilities exist to provide for continued judicious use of both new and existing roads on those tracts of land that remain largely unroaded. Middle-ground alternatives should have been considered, and their economic impacts evaluated and compared to the January 12 Rule. This nation has the means to avoid adverse environmental impacts to the land without essentially having to stop all resource-based economic activities. Not only was the absence of other reasonable alternatives inconsistent with RFA, but NEPA requirements as well. (Business or Association, Spokane, WA - #A17351.20217)

## Revised Statute 2477

### 168. Public Concern: The Forest Service should comply with Revised Statute 2477.

#### WITH RESPECT TO ROAD CLOSURES

I am disgusted by the very prospect of the roadless initiative. For starters, it is illegal to close many of these roads under RS 2477. It seeks to decrease public access to the back country, eventually corralling the citizens of the US into small urban areas. (Individual, Anoka, MN - #A359.20208)

If you so much as touch an RS-2477 you will be trying to defend yourself before a judge. (Individual, No Address - #A6724.20208)

Most of the motorized trails have served as important public access routes since the turn of the century. This significance is clearly demonstrated by the number of historic mines and structures that are located along these routes. We have observed that these travelways are currently significant recreation resources for motorized visitors in the area including ATV, motorcycle, and four-wheel drive enthusiasts. Many of these travelways have right-of-ways as provided for under the provisions of Revised Statute 2477. These roads are shown on many older mapping sources including: aerial photographs, 15-minute USGS quadrangle sheets, and older county maps. The cut and fill sections and obvious roadbed indicate that these roads were constructed and used by the public for access to the forest. RS 2477 was created to provide adequate public access to our public lands. Now this public access is being eliminated. These travelways must remain open based on; (1) their history of public access, (2) the access that they provide to interesting historical sites, and (3) their significance to public access. The document must evaluate all of the issues surrounding RS 2477 including the cumulative impact of all past closures of RS 2477 routes. (Organization, Helena, MT - #A13226.20208)

All of the routes proposed for closure by the Forest Service were in existence before 1976 and, therefore, have RS 2477 rights-of-way to provide the public with access to public lands. (Organization, Helena, MT - #A13226.20208)

The rule ignores state law that reserves to the public, access to all section lines. In 1866 Congress provided rights of way for the public to federal lands, commonly known as R.S. 2477 grants. The State accepted the R.S. 2477 grant upon statehood, by declaring all section lines open to the public. (Governor, State of North Dakota - #A22065.20208)

A major concern of Catron County Commission is the RS 2477 Roads that lace the Gila and Cibola national forests in Catron County, including the proposed Roadless areas. The Catron County RS 2477 Roads are property of the County and its citizens. Yet the County Commission is concerned that the Roadless Initiative would usurp County jurisdiction with the federal government illegally "taking property" that belongs to the County. Catron County Commission has notified the national forest of its RS 2477 Roads has been done in the current Roadless EIS. The County has also requested to be a partner in joint environmental analyses of any Forest Service initiatives that could impact Catron County and its citizens' private properties. The County was not properly notified for early consultation, given the number of RS 2477 Roads on the national forests in Catron County. (Elected Official, Catron County, NM - #A15538.20208)

#### BY ACKNOWLEDGING ALL IDENTIFIED REVISED STATUTE 2477 RIGHTS-OF WAY AS ROADS

The proposed roadless policy must acknowledge the existence of Revised Statute 2477 rights-of-way (R.S. 2477) which allow access to lands owned by the State of Alaska and other private property. All identified RS 2477 rights-of-way in Alaska's and in the Lower 48 states, must be acknowledged as

“roads” for purposes of this regulation, regardless of the width of the roadway and its current condition. Otherwise, the proposed policy would violate RS 2477 and the Alaska Statehood Act. (Individual, Anchorage, AK - #A11831.20208)

**169. Public Concern: The federal government should issue easement deeds that title insurance companies will insure.**

**INCLUDING REVISED STATUTE 2477 ROUTES**

The Federal Government should issue easement deeds that Title Insurance Companies will insure including RS2477 routes. Enforcement jurisdiction lies within the counties. The Federal government may be obstructing justice by interfering with access guaranteed by Congress under RS2477, exempted by FLPMA and the National Preservation Act.

California Civil code 15:66 provides that the owner of an easement has the right to maintain and repair the easement, and the duty extends to the city or other public agency on a public easement so as to prevent injury. (Individual, Santa Ysabel, CA - #A26392.20000)

**170. Public Concern: The Forest Service should defer action on roadless area management until local communities complete studies of Revised Statute 2477 claims.**

The Forest Service is forcing local communities to begin costly and time consuming RS 2477 claims and studies since this appears to be the only avenue local communities have in maintaining local access to their public lands. These studies must be completed prior to any Forest Service roadless area designations or restrictions. (Individual, Alturas, CA - #A28581.20208)

**171. Public Concern: The Forest Service should clarify its position on Revised Statute 2477 roads.**

**WITH RESPECT TO ROADLESS AREAS**

We have one other concern that we did not see expressed here. That concern is: How is the Forest Service going to deal with RS 2477 roads, and how do those roads fit into the roadless area discussion?

Currently the Forest Service has no position on RS 2477 roads. There is no policy in place to recognize or deal with such roads. If a county asserts RS 2477 routes they are met with silence by the agency. If the county then pushes the issue the routes are grudgingly recognized (maybe), subject to unilateral action on the part of the agency to cancel that recognition if it (the agency) so decides.

This question can have an impact on a roadless area. If a county asserts an RS 2477 right-of-way for a road through a roadless area, and the agency refuses to accept that assertion, what happens to the roadless area until that disagreement is settled, and what process is used to settle the disagreement?

We would like to see this issue addressed at some point. It may have to be addressed in a separate regulation or policy statement, but we believe it ties in with the roadless issue. (Elected Official, Fremont County, ID - #A4942.20208)

**172. Public Concern: The Forest Service should consult with counties regarding Revised Statute 2477 roads.**

**SIERRA COUNTY**

The Gila National Forest in Sierra County already has substantial non-multiple use (Roadless, restricted and wilderness) areas. In addition, Sierra County RS 2477 Roads could be in jeopardy unless there is proper Forest Service consultation with the County Commission. (Manager, Sierra County, NM - #A22059.20208)

A major concern of Sierra County Commission is the RS 2477 Roads that lace the Gila National Forest in Sierra County, including the proposed Roadless areas. The Sierra County RS 2477 Roads are property

of the County and its citizens. Yet the County Commission is concerned that the Roadless Initiative would usurp County jurisdiction with the federal government illegally “taking property” that belongs to the County. Sierra County Commission has notified the national forest of its RS 2477 properties on the forest. Yet no proper consideration of the RS 2477 Roads has been done in the current Roadless EIS. The County has also requested to be a partner in joint environmental analyses of any Forest Service initiatives that could impact Sierra County and its citizens’ private properties. The County was not properly notified for early consultation, given the number of RS 2477 Roads on the national forest in Sierra County.

It should also be noted that federal agencies couldn’t extinguish or adversely impact RS 2477 Roads. Only the affected county of US Congress can extinguish, change or abandon RS 2477 Roads. The 1997 omnibus act, section 108, states that no final rule or regulation of any agency of the federal government pertaining to the recognition, management or validity of a right-of-way pursuant to RS 2477 shall take effect unless expressly authorized by an act of Congress. (Manager, Sierra County, NM - #A22059.20208)

**173. Public Concern: The Forest Service should comply with the Revised Statute 2477 (RS 2477) savings provisions and the Section 108 prohibition against redefining what an RS 2477 road is.**

First and foremost, the Forest Service must obey the law, most particularly the RS 2477 savings provisions of FLPMA and the Section 108 prohibition against redefining what an RS 2477 is. The 30,000 or so comments that you have received from eco-fanatics do not trump these laws. We doubt that Congress will change these statutes, because to do so would result in multi-billion dollar claims under the Taking clause of the US Constitution’s Fifth Amendment. This is why Congress wrote the savings provisions of FLPMA in the first place. (Organization, Tonopah, NV - #A20337.20000)

The USFS is attempting to define the terms “roadless areas” and “unroaded areas” in a way which adversely affects the recognition and validity of RS-2477 rights-of-way in a manner that has been expressly prohibited by a Congressional moratorium (Section 108). **These definitions are an inherent component of both the proposed “roadless area” moratorium rule and the ANPR.** Moreover, these definitions have been published in the Federal Register for public comment, as is required under the Administrative Procedures Act. This attempt to establish regulations through the use of a unilateral proclamation of the USFS is an illegal action, in defiance of Congress and in violation of the Administrative Procedures Act, the savings provisions of FLPMA, and Section 108.

The U.S. Constitution states that “ALL legislative powers herein granted shall be vested in a Congress of the United States, which shall consist of a Senate and House of Representatives.” (emphasis added) The executive agencies, including the USFS, have **no** constitutional authority of their own to make law. Only the Congress can do that. Hence, a unilateral act of the USFS (or any agency) to establish rules (or inherent components thereof such as definitions) by cloaking them as “policy” in defiance of the express will of Congress is unconstitutional and unlawful. (Organization, Tonopah, NV - #A20337.20000)

**BY RESPECTING ALL VALID EXISTING RIGHTS**

The Forest Service should respect ALL “valid existing rights,” as stated in the Federal Land Policy and Management Act of 1976. (Individual, Eckert, CO - #A28671.20205)

*Tongass Timber Reform Act*

**174. Public Concern: The Forest Service should comply with the Tongass Timber Reform Act.**

**BY EXCLUDING THE TONGASS NATIONAL FOREST FROM THE FINAL RULE**

Including the Tongass in the final rule prohibits the Forest Service from complying with the Tongass Timber Reform Act (TTRA) and the Alaska National Interest Lands Conservation Act (ANILCA). (Elected Official, Haines, AK - #A18063.20400)

**BY PROVIDING AN ADEQUATE VOLUME OF TIMBER**

It . . . fails to consider the Tongass Timber Reform Act's directive that the Forest Service should supply an adequate volume of timber to meet the needs of Southeast Alaska's timber industry and timber-dependent communities such as the Borough. (Ketchikan Gateway Borough, AK - #A17476.20200)

The Tongass Land and Resource Management Plan (TLMP) just completed an 11-year, \$13 million revision funded by American taxpayers, which is currently under appeal by several entities. In addition to other legal impediments to the application of the roadless proposal on the Tongass, no changes in land allocations on the Tongass can be made by the Forest Service except to correct legal errors in the TLMP revision procedures or pursuant to a forest plan amendment following NFMA procedures. Adoption of the proposed rule will lead to violation of the Tongass Timber Reform Act (TTRA) because the Forest Service will be unable to meet market demand for timber sales as called for in this statute. (Tribal Corporation, Anchorage, AK - #A20340.20400)

**175. Public Concern: The Forest Service should acknowledge legal rulings that the Tongass Timber Reform Act does not require unconditional timber sale offerings.****BY INCLUDING THE TONGASS NATIONAL FOREST FROM A NATIONAL RULE**

The Forest Service claims that the agency cannot include roadless areas of the Tongass in the policy because "use of the Tongass National Forest's inventoried roadless areas for timber production contributes to the Forest Service's effort to seek to meet (within the meaning of Section 101 of the Tongass Timber Reform Act) market demand for timber in the Tongass National Forest consistent with providing for the multiple use and sustained yield for all renewable forest resources. . . . First of all, the "seek to meet market demand" provision is subject to all other laws, consistent with providing for the multiple use and sustained yield for all renewable forest resources. Those forest resources include outdoor recreation, watersheds, wildlife and fish purposes (see Multiple Use Sustained Yield Act, 16 USC Sec. 528.)

The Ninth Circuit Court of Appeals, in *Alaska Wilderness Recreation and Tourism Association vs. Morrison* (1995), held that "TTRA envisions not an inflexible harvest level, but a balancing of the market, the law, and other uses, including preservation."

The Forest Service itself has advocated this more flexible 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.)

Finally, the Department of Agriculture formally adopted these interpretations in the decisions on the appeals of the Tongass Land Management Plan Revision:

Section 101 clearly states that this provision is "subject to appropriations, other applicable law, and the requirements of the National Forest Management Act of 1976." In addition, it also clearly states that meeting demand is subject to being "consistent with providing for multiple use and sustained yield of all renewable forest resources." (Organization, Sitka, AK - #A30486.75510)

## Weeks Act

### 176. Public Concern: The Forest Service should comply with the Weeks Act.

#### BY MANAGING FOR MULTIPLE USES

Please insist that **your** Agency manage **my** forests for multiple-use including timber production. The 1911 Weeks Act requires it. (Individual, Princeton, WV - #A18086.50200)

## Wild Horse Act

### 177. Public Concern: The Wild Horse Act should be revised.

#### DUE TO ITS ROLE IN INCREASING THE HORSE POPULATION

The Wild Horse Act must be revised. The cost is too high. The overall horse population in the United States is forced to increase when it should be decreasing. (Individual, Klamath Falls, OR - #A8809.20200)

## Wilderness Acts

### 178. Public Concern: The Forest Service should comply with the Wilderness Act.

I believe that the Roadless initiative violates the Wilderness Act. Congress should have oversight of any policy of such magnitude. (Individual, Sumter, SC - #A6210.20206)

Protection for “roadless” areas is unnecessary given the existence of the Wilderness Act. Inventoried “roadless” areas selected for future protection should be proposed to Congress for wilderness designation; there is no need for two separate processes to achieve the same goal. In addition, by proposing inventoried “roadless” areas to Congress, the Forest Service will avoid allegations that it is attempting to create de facto wilderness areas in violation of the Wilderness Act. (Business or Association, Reno, NV - #A21755.20206)

#### REGARDING LAND INVENTORY AND WILDERNESS RECOMMENDATIONS

In 1964 the Wilderness Act was passed and signed into law. The law required that the Forest Service and the Bureau of Land Management inventory the lands under their responsibility and recommend to Congress the areas that should be considered “wilderness.” (Elected Official, Gila County, AZ - #A3013.20206)

#### BY NOT CREATING DE FACTO WILDERNESS AREAS

Not only is this outcome poor public policy, but also designation of this roadless area directly flouted Congress’ intent in carefully drawing the boundaries of the Jarbidge Wilderness. The original designation of that wilderness area occurred as part of the Wilderness Act of 1964, 16 U.S.C. [section] 1132(a) (“1964 Wilderness Act”), and it was expanded in 1989, 103 Stat. 1784. The Wilderness Act and its legislative history make clear that Congress drew the boundaries carefully, and no protective perimeters outside of those boundaries were to be presumed. Instead, the remaining lands were intended to remain open to multiple use. Moreover, no further roadless area review and evaluation of National Forest lands in Nevada was to be conducted without congressional authorization. See 135 Cong.Rec. S11510-11515 (Sept. 20, 1989). Through the Roadless Rule, however, the Forest Service has acted directly contrary to congressional will by making a *de facto* extension of the Jarbidge Wilderness to include the area between AGNA’s operations at Jerritt Canyon and Big Springs as well as other “roadless” designations throughout Nevada. (Business or Association, Washington, DC - #A19636.20206)

The West Elk Mine is located a few miles from the West Elk Wilderness Area designated by Congress under the 1964 Wilderness Act. 16 U.S.C. [section] 1132. Despite its proximity to the Wilderness Area, the Mine has been able to operate successfully, largely because in 1964 Congress carefully considered the boundaries of that Wilderness and explicitly noted that “no future administrator” of the Forest Service could “make wholesale designations of additional areas in which use would be limited.” House Report No. 1538, 88th Cong. (July 2, 1964), reprinted in 1964 U.S.C.C.A.N. at 3616-17. (Business or Association, Washington, DC - #A19636.20206)

## **179. Public Concern: The Forest Service should comply with the Wyoming Wilderness Act.**

### **BY NOT CREATING DE FACTO WILDERNESS AREAS**

Be very careful road selection by the BTNF some of the roads closed violated “The Wilderness Act”. Authority to extend or reduce the wilderness boundaries is invested solely in Congress. By closing these selected roads they extended the wilderness boundary from the point of closure to the original wilderness boundary. At the very least they created many more square miles of de facto forest. This was also a violation of “The Wyoming Wilderness Act of 1984.”

This needs to be set right before any reasonable form of road management can be formulated. Many times I have asked from the Attorney General down to the local management for just one law or rule or what ever that allowed the enactors of the road plan to extend the wilderness boundary. If that information was forthcoming then we could let that old dog lie in peace. (Individual, Rock Springs, WY - #A5695.20206)

### **BY NOT ESTABLISHING BUFFER ZONES**

In the Wyoming Wilderness Act of 1984 it specifically prohibits establishment of Buffer Zones and it appears that so-called roadless areas could be constructed as Buffer Zones. (Conservation District, Sublette County, WY - #A28888.20200)

### **BY NOT CONDUCTING ANY FURTHER ROADLESS AREA REVIEW AND EVALUATION**

The advance notice of proposed rulemaking dated July 3, 2001 states “The Forest Service has been evaluating roadless areas for nearly 30 years”. While this may be true Service-wide, this effort was concluded in Wyoming with the passage of the Wyoming Wilderness Act of 1984 (Public Law 98-550).

This public law states in Title II, the Congress has made its own review and examination of the National Forest Roadless Areas in Wyoming and the environmental impacts associated with alternative allocation of such areas.

Section 401(b) On the basis of such review, the Congress hereby determines and directs that—(2) the Forest and Rangeland Renewable Resources Act of 1976 (Public Law 94-588) to be an adequate consideration of the suitability of such lands for inclusion in the National Wilderness Preservation System and the Department of Agriculture shall not be required to review the wilderness option prior to the revisions of the plan, but shall review the wilderness option when the plans are revised.

Section B(3) areas in the State of Wyoming reviewed . . . shall be managed for multiple use in accordance with the land management plan.

Section B(5) 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 Wyoming for the purpose of determining their suitability for inclusion in the National Wilderness Preservation System. (Business or Association, Cody, WY - #A41559.45400)

## **180. Public Concern: The Forest Service should comply with the Oregon-Washington Wilderness Act.**

### **BY HONORING ITS PROMISED EXCHANGE OF 86,000 ACRES OF TIMBER GROUND FOR DESIGNATED WILDERNESS AREA**

The 1984 Oregon-Washington Wilderness Act promised our community 86,000 acres of timber ground in the unroaded area in exchange for the designated wilderness we got. We're still waiting for the first mile of road to be built. (Individual, Clarkston, WA - #A6015.20206)

The roadless regulation dictated unilateral prohibitions, which illegally usurped the authority of national forest plans, violated the National Environmental Policy Act, as well as violated the 1984 Oregon Wilderness Act (OWA). National forests comprise a majority (58%) of the productive forest acreage in Oregon. The roadless regulation instituted a unilateral prohibition on 1.620 million acres of Oregon national forests—or 10 percent of the state's national forest acreage. National forest plans directed that some 931,000 acres of this acreage be managed for multiple uses, including road access. Another 2.923 million acres of national forest area [were] already in designated Wilderness and other legally withdrawals. We find the roadless regulation illegally ignored the authority of the NFMA, NEPA, and OWA. (Business or Association, Salem, OR - #A21754.20200)

## *Executive Orders*

## **181. Public Concern: The Forest Service should comply with Executive Order 12866.**

In a great many areas our schools, roads, family and community incomes have been adversely effected by this proposal. This proposal contradicts the September 1993 executive order 12866 handed down by Clinton himself. (Organization, Orofino, ID - #A8393.20300)

### **BY IDENTIFYING A NEED FOR A NEW REGULATION**

In the proposed rule that led up to the January 12, 2001, rule, the Forest Service advanced three principal reasons why the proposed rule is necessary: (1) road construction can alter the fundamental characteristics of roadless areas; (2) budget constraints limit the number of roads that can be adequately maintained; and (3) the controversy over management of roadless areas causes costs and delays. But the Forest Service did not identify a market failure or other compelling public need for the proposed rule. None of the above reasons indicate a need for a nationwide prohibition on road construction.

Executive Order 12866 requires regulatory agencies to identify a need for new regulations, stating: "Each agency shall identify the problem that it intends to address (including, where applicable, the failures of private markets or public institutions that warrant new agency action) as well as assess the significance of that problem [emphasis added]." [see Clinton 1993, Executive Order 12866, Section 1(b)(1)] The Executive Order also states: Federal agencies should promulgate only such regulations as are required by law, are necessary to interpret the law, or are made necessary by compelling public need, such as material failures of private markets to protect or improve the health and safety of the public, the environment, or the well-being of the American people. [Ibid., Section 1]

To implement the Executive Order and to comply with Section 638 of the Fiscal Year 1999 Omnibus Appropriations Act and Section 628 of the Fiscal Year 2000 Treasury and General Government Appropriations Act, the Office of Management and Budget (OMB) in March 2000 released guidelines standardizing the measurement of costs and benefits. In the Guidelines, the Director of the OMB explained to heads of departments that you should explain whether the problem arises because of a significant market failure or some other compelling public need." [See Lew, Jacob. 2000. Guidelines to Standardize Measures of Costs and benefits and the Format of Accounting Statements. Washington, D.C.: Office of Management and Budget, March 22. URL:] The Director added: If the problem is not a significant market failure, you should provide an alternative demonstration of compelling public need [emphasis added]." [Ibid]

The description of the need for the regulation provided by the Forest Service in the proposed rule that resulted in the January 12, 2001, rule fails to satisfy the Administration's requirements for economic analysis of regulations. None of the three reasons provided satisfy the requirements of Executive Order 12866 or OMB's Guidelines to Standardize Measures of Costs and Benefits. To comply with the Administration's regulatory policies, and with the well-accepted principles of good governance that they represent, the Forest Service should identify a need for the regulation before proceeding further with the development of specific regulatory proposals. (Business or Association, Washington, DC - #A29622.20300)

## **182. Public Concern: The Forest Service should comply with Executive Order 13211.**

### **BY PREPARING A STATEMENT OF ENERGY EFFECTS**

Because of the aforementioned flaws in the Forest Service's analysis of the impacts of the Roadless Rule on coal production and reserves, the Companies believe that the Agency must now undertake the preparation of a "Statement of Energy Effects," as required by President Bush's Executive Order 13211. See 66 Fed.Reg 28355 (May 22, 2001). That Executive Order recognizes (as a matter of federal policy) the need to address the sort of problem the companies have identified in the Forest Service's flawed analysis.

Section 4(b) of E.O. 13211 defines the term "significant energy action" to include agency action that "is likely to have a significant adverse effect on the supply, distribution, or use of energy..." Id. at 28356. The effects of the Roadless Rule on the Nation's coal production and reserves fall squarely within this definition. (Business or Association, Washington, DC - #A19636.20300)

The Forest Service should review the ANPR in light of Executive Order 13211, to determine if this process may constitute a "significant energy action" that may have any adverse effects on energy. The Forest Service should determine: any adverse effects on energy supply, distribution, or use (including a shortfall, price increases, and increased use of foreign supplies) should the proposal be implemented, and reasonable alternatives to the action with adverse energy effects and expected effects of such alternatives on energy supply, distribution, and use.

Among the mineral commodities that will be affected by a national roadless rule is the increasingly important reserve base of federal coal located on National Forest System lands. The Nation must use this vast supply of domestic energy to meet the growing energy requirements of an expanding economy. During the 1990s, about 350 million tons of coal was produced annually from federal coal leases. Demand for coal for affordable reliable electricity is expected to increase over 25% during the next 20 years.

Nearly 90% of this additional coal production will come from lands in the West and most of this coal will come from federal leases. The U.S. Energy Information Agency forecasts that by 2020 over 785 million tons of coal will be produced from the West. The coal underlying the National Forest System is of critical importance to our Nation's energy needs. Some 21 million acres within the System contain about 30 billion tons of recoverable reserves. Watson W.D. et al., 1995, Coal Resources in Environmentally-Sensitive Lands Under Federal Management: Reston, VA, U.S. Geological Survey, Open File Report 95-631. If this affordable coal is not available, high costs for alternative fuels will result in higher electricity costs and lower reliability. Coal resources from federal leases are vital to supplying electricity at a reasonable price and in an environmentally sound manner to American consumers both east and west of the Mississippi River.

The federal treasury, as well as state and local governments, share in the economic benefits derived from the production of America's most abundant energy resource from federal lands. The already small margin on which miners that produce federal coal operate will be shrunk further by this additional prescription on federal coal leasing. The cumulative impact of this process must be evaluated as required by EO 13211. (Business or Association, Washington, DC - #A29622.20300)

**BY ENSURING AN ADEQUATE LAND BASE IS AVAILABLE FOR LEASING WITH REASONABLE STIPULATIONS**

While we recognize that oil and gas leasing may be controversial in some parts of the NFS, we encourage the agency to take particular care in making sure that an adequate land base is available for leasing with reasonable stipulations in accordance with President Bush's Executive Order 13211. The FS must certainly recognize that industry has repeatedly demonstrated its ability to conduct oil and gas operations in a sound environmental manner, with little or no long-term disturbance. (Business, Denver, CO - #A25688.65310)

**183. Public Concern: The Forest Service should reevaluate its application of Executive Orders 11644 and 11989.**

**WITH RESPECT TO RESOLUTION OF CONFLICTS BETWEEN USERS**

Executive Order 11644 was passed on February 8, 1972 and Executive Order 11989 was passed on May 24, 1977. These Executive Orders have been used to enact thousands and thousands of motorized recreation and access closures since the 1970s. The cumulative effect of Executive Orders 11644 and 11989 has been a dramatic loss of recreation and access opportunities for motorized recreationists and a dramatic increase in recreation opportunities for non-motorized recreationists.

Executive Orders 11644 and 11989 allowed the reason "minimize conflicts among the various uses" to be used to enact motorized closures (see attached Executive Orders). It did not state "minimize conflict with other users". However, the implementation of Executive Orders 11644 and 11989 has been largely based on the incorrect usage of "minimize conflict with other users". The crux here is that "use" conflict is rather different from "user" conflict. There are certainly "uses" that are incompatible from an objective standpoint. For example, a ski run and a mine cannot operate in the same place at the same time . . . it is physically impossible and therefore a clear "use conflict." But there could be a case where a mine is located next to a ski hill and both can operate without interference, with no genuine use conflict. Whether there is a "user conflict" or not depends primarily on user attitudes. (Organization, Helena, MT - #A13226.20300)

**184. Public Concern: The Forest Service should comply with executive orders directing federal agencies to expedite permitting and to reduce impediments to energy development.**

We also believe the Roadless Initiative is in direct contrast to the President's Executive orders directing federal agencies to expedite permitting and to reduce impediments to energy development. (Business, Bismarck, ND - #A19270.20300)

*Other*

**185. Public Concern: The Forest Service should comply with Public Law 96-550.**

**BY RESCINDING THE ROADLESS AREA CONSERVATION RULE**

An Executive Order on the Roadless initiative will:

1. Overturn the Public Law 96-550 enacted by the 96th Congress December 1980
2. Be contrary to the 1986 Carson National Forest Plan concerning Sipapu Ski Area
3. Negate 15 years of work and expense by the Forest Service and Sipapu in developing an EIS for ski area expansion
4. Be an environmental injustice by creating economic and social hardships on the poorest counties in northern New Mexico
5. Circumvent the right for appeal

Public Law 96-550 enacted by the 96th Congress December 1980

The purpose of the act is very specific with its main points:

1. Designate certain National Forest lands to be included in the National Wilderness Preservation System.
2. **Insure certain other National Forest System lands in NM be promptly available for non-wilderness uses including but not limited to campground and other recreation site development, timber harvesting, intensive range management, mineral development and watershed and vegetation manipulation.**
3. Designate certain other National forest System land in NM for further study in furtherance of the purposes of the Wilderness Act.

The land surrounding the ski area was not included as wilderness lands, not included for further study and **was included in other lands promptly available for non-wilderness uses.**

The EIS for the Carson National Forest Plan, completed in 1986, is in accordance with Public Law 96-550 and designated management area 15 for ski area expansion. (Permit Holder, Vadito, NM - #A20142.10140)

### **186. Public Concern: The Forest Service should comply with Public Law 105-359.**

#### **BY PROVIDING RECREATION AND OUTDOOR OPPORTUNITIES FOR THE HANDICAPPED, ELDERLY, AND PHYSICALLY IMPAIRED**

Handicapped, elderly, or physically impaired, can only recreate on motorized roads and trails and recreation opportunities must be considered for them. On November 10th, 1998, President Clinton signed Public Law 105-359, requiring the Secretary of Agriculture and the Secretary of the Interior to conduct a study to improve access for persons with disabilities to outdoor recreation opportunities made available to the public.

The Study prepared to address P.L. 105-359 (Improving Access to Outdoor Recreational Activities on Federal Land, prepared by Wilderness Inquiry, June 27, 2000) found and recommended the following areas of action:

- 1) Agencies must re-dedicate their efforts to achieve the goal of equal opportunities for access to outdoor recreation by persons with disabilities.
- 2) Agencies should conduct baseline assessments of existing facility and programmatic accessibility, and develop and implement transition plans for facilities and programs that are not now accessible to bring them into compliance.
- 3) Increase accessibility related awareness and educational opportunities for agency personnel, service providers, and partners.
- 4) Increase funding to federal land management agencies for accessibility.
- 5) Increase accountability and oversight in implementing accessibility initiatives.
- 6) Improve communications about opportunities for outdoor recreation to persons with disabilities.
- 7) Clarify the balance between resource protection and accessibility.

The document and decision must adequately address and comply with the recommendations of the Study conducted to address P.L. 105-359 including items 1 and 7. (Organization, Helena, MT - #A13226.20200)

### **187. Public Concern: The Forest Service should comply with the 1997 guidance document by the Council on Environmental Quality regarding environmental justice.**

#### **AS IT RELATES TO EQUAL TREATMENT AND ACCESS TO PUBLIC LANDS**

The document and decision must comply with the requirements of Environmental Justice as presented in the 1997 guidance document by the Council on Environmental Quality. These requirements must be evaluated as they relate to equal treatment and access to public lands for all people including disabled and motorized visitors. One example of unequal treatment can be seen demonstrated by the number of publications and web site information pages that each forest provides for non-motorized visitors versus

the publications and web site information pages provided for motorized recreationalists. Non-motorized recreation opportunities are easy to find using agency web sites and printed information. Often very little information is provided about motorized recreation opportunities. (Organization, Helena, MT - #A13226.20300)

## Chapter 3

# Public Involvement

This chapter includes three main sections: Informed Decisionmaking (Question 1), Working Together (Question 2), and Competing Values/Limited Resources (Question 9).

### Informed Decisionmaking (*Question 1*)

***Question 1: Informed Decisionmaking. What is the appropriate role of local forest planning as required by NFMA in evaluating protection and management of inventoried roadless areas?***

This section includes four subsections: Informed Decisionmaking General, Decisionmaking Authority, Local vs. National Decisionmaking, and The Forest Planning Process.

#### Informed Decisionmaking General

##### Summary

The most persistent general remark regarding informed decisionmaking is that the Roadless Area Conservation Rule, in the form in which it was signed in January, 2001, represents informed decisionmaking at its best. This remark follows a recurring theme in comment on the Advance Notice of Proposed Rulemaking—the Rule, respondents state, is the result of more than 600 public hearings and 1.6 million public comments, which they believe should prove that the American public is behind this policy. These respondent consider the Rule as it now stands is a good example of informed decisionmaking. Respondents also encourage the Agency to make the best decisions it can within existing constraints, to streamline the decisionmaking process, and to avoid making decisions merely to avoid litigation. To aid in decisionmaking, some suggest making roadless area decisions through an allocation process, or issuing a preliminary document for public review.

#### **188. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule is a good example of informed decisionmaking.**

Informed Decision making: The Roadless Area Conservation Rule as it now stands is the result of more than 600 public hearings and 1.6 million public comments, the vast majority of which supported protection of our national forests. The rule as it now stands is a good example of informed decision making. Future NFMA planning for these inventoried roadless areas should be guided by the Roadless Area Conservation Rule. (Individual, Reno, NV - #A5110.10152)

The RACR was an appropriate resolution of the RACR, being universally available to public comment, and demonstrated the sometimes-overwhelming need to respect a national demand. Every interested

party mentioned had the ability to comment, early and often. If the Forest Service is going to switch to another model of decision-making, now is not the appropriate time. The RACR is an appropriate national sidebar for management of all National Forests, akin to avoiding harvesting on slopes greater than a certain degree or on lands that have not been surveyed for wildlife, neither of which we question as being an abridgement of local authority. (United States Representative, Georgia - #A693.14410)

The Roadless Rule was signed following almost 30 years of research and an extensive public review and comment period, which generated the largest number of responses ever in the rulemaking process—mostly in favor of the rule. Many citizens spent much time and thought responding to the Roadless DEIS. This administration is, in essence, discarding the efforts and input of 1.6 million Americans by ignoring the previous process. The current ANPR process, by comparison, has had little publicity and no public meetings and asks us to respond to questions, which have already been answered. Others, when asked if they have comments on Roadless, reply that they have already done that—last year. This process is not fair and open. It is not soliciting meaningful dialogue and input; many are not even aware it is occurring. The administration is attempting to recount the votes, relying on a low response, so it can change the Rule to fit its own agenda to the benefit of the extractive industries. As justification for issuing the ANPR the USDA cited eight lawsuits, which shared the common allegation that there was an inadequate opportunity for public review and comment on the Roadless Rule. The Attorney General, whose responsibility is to uphold federal law, did nothing to defend the Rule or the process—there was no defense of this federal rule by any federal entity. We have had a fair and open process on the Rule. The ANPR process is the opposite. (Individual, Klamath Falls, OR - #A5118.14000)

**189. Public Concern: The Forest Service should recognize that informed decisionmaking processes have occurred under the National Forest Management Act and state wilderness bill processes.**

I can't help address point one on informed decision-making. I believe this process (informed decision-making) has occurred under the NFMA and individual state wilderness bill processes. I have been involved in both processes in Colorado and Montana over the years, and can vouch for the thoroughness of these exercises. RARE I and II were nearly exhaustive in their scope, and later roadless inventories on individual districts rounded out the investigations. Forest Planning was not always so detailed, but this process gave ample opportunity for input and informed decision-making.

One positive benefit of these exercises was the opportunities for heightened awareness on the part of the public who participated. Whether our learning came from advocacy groups, or from planning and forest staff, anyone who went through these exercises was the wiser for the experience. When I, and thousands of others attended roadless area meetings that led to the rule, we benefited by the earlier processes. I have to say, that if the opponents to roadless areas are complaining about the rule, what they are really complaining about is government . . . . (Individual, Bozeman, MT - #A6287.10157)

**190. Public Concern: The Forest Service should use the best available means within existing constraints in decisionmaking.**

*Many assert that the appropriate process for evaluating and making long-term resource management direction—including inventoried roadless area protection and management—is through the local forest planning process, which is governed by the rules at 36 CFR 219.*

The phrase “the most appropriate process” fails to reflect the fact that decisions are made and must be made within specific contexts. The Forest Service, for example, can not spend the entire GNP of the United States in its efforts to make any particular decision. Other parameters limiting decision-making include but are not limited to time, staff, uncertainties in communications, and imperfect information. Decisions should be made using the best available means within constraints active at the time. (Individual, Nederland, CO - #A19016.11110)

**191. Public Concern: The Forest Service should streamline the decisionmaking process.****TO ELIMINATE LONG DELAYS**

The decision process should be timely and eliminate the long delays brought about by layer after layer of legal traversing.

Paper shuffling and multiple studies on the same research topic or proposed management action must be eliminated. The USFS [should] become more time constrained, more oriented to actual on-the-ground results. (Individual, Libby, MT - #A10531.12000)

Finally, make a decision and implement the decision as quickly as possible. It's OK if everybody doesn't like it. The roadless issue has dragged on far too long. Our resources are suffering because of indecision. (Business or Association, Spokane, WA - #A21364.10130)

**192. Public Concern: The Forest Service should not make decisions merely to avoid litigation.**

The Forest Service must make decisions based upon the welfare of the forests and the interests of all Americans in that welfare. Therefore, it must not consider the litigiousness of participants in any of these processes. In other words, the Forest Service must not make decisions based upon its desire, or upon the desire of local Forest Service employees, not to be sued in court. Where a pattern of frivolous lawsuits is discernable, the Forest Service should petition the Department of Justice or U.S. Attorney's Office to seek monetary sanctions against the offending groups and the attorneys that represent them. (Organization, Denver, CO - #A29624.15100)

The Forest Service cannot let the fear of a lawsuit unnecessarily influence its forest management decisions or the timely implementation of actions such as timber harvest. The Forest Service also has a responsibility in the continued viability of the United States industrial base, and cannot let the fear of lawsuits result in an over dependence on foreign products due to a lack of U.S. production. (Individual, No Address - #A28621.15166)

**193. Public Concern: The Forest Service should make roadless area decisions through an allocation decision process.**

I think this rule should specify a process that allows people with a wide range of views to participate as representatives. The letter writing campaign approach voting for or against a decision is not what was specified by congress and the president through the NEPA law. I think this IRA issue is of such import and is steeped in strong opinions that it needs an allocation decision process that facilitates participation of the stakeholders but forced to go through an analytical process reporting the effects and trade-offs with a decision at the end that allows a portion of finality at least for a specified time period (15 years) and during that time then projects don't have to reanalyze the roadless value issue again. (Individual, Missoula, MT - #A28297.15100)

**194. Public Concern: The Forest Service should issue a preliminary document for public review.**

Preliminary forest plan rewrites or updates can be prepared using known interests of various groups including local communities and tribes. Suggestions can be solicited. It's important to issue a preliminary document for review because it will generate the needed thought, especially if there are areas or items of disagreement such as road closures. Meet and work out the details. (Individual, Minneapolis, MN - #A8016.15111)

## Decisionmaking Authority

### Summary

**The Forest Service** – A variety of respondents suggest that decisionmaking authority should remain with the Forest Service. Some say the Chief should make decisions regarding management of roadless areas, but others defer to the Agency in general. Respondents say the Forest Service should make decisions rather than Congress, rather than politicians in general, and rather than the public. One association states that collecting comments from all interested parties does not divest the Forest Service of its obligation to make decisions based on what is best for the land and its inhabitants, within the confines of the current framework and congressional direction. This respondent does not believe the general public qualified to direct decisions nor should they be held responsible for land management decisions.

Respondents offer a number of suggestions on how the Forest Service can best carry out its decisionmaking responsibility. Some of these include developing uniform direction for the procedures to be used in roadless area management decisionmaking; conducting large regional meetings of forest officials; allowing each national forest to assume the lead responsibility for developing management proposals; giving the district ranger greater decisionmaking authority; and allowing local forest managers to have complete decisionmaking authority.

Some suggest that the Forest Service should insulate local officials from decisionmaking so they will not suffer negative repercussions from locally unpopular decisions. Finally, some ask the Forest Service to clarify its authority and relationship with Congress, as well as the discretionary authority of the responsible official.

**Legislative Bodies/Other Groups** – A number of respondents assert that Congress should manage federal lands. According to some individuals, federal land, in general, should be managed at the federal level in Congress, where there is equal representation. Those who take this position say congressional decisionmaking would allow better consideration of local conditions, an end to the present stalemate over roadless area management, and more consistency in forest plans. Others suggest that the Forest Service develop management plans, then submit them to Congress for final approval.

Other respondents suggest that states should manage federal lands. What would be most useful, submits one individual, would be to turn all federal land over to the states and let them manage. Both those advocating congressional management and those advocating state management stress the point that decisionmaking should be the purview of elected representatives. Elected representatives, they argue, would be more responsive to local concerns and more accountable for their decisions.

Finally, people suggest that various other groups be decision makers. Suggestions include committees composed of various groups: unaffiliated individuals, representatives of different interests, scientists and Forest Service specialists, or a committee assigned by county commissions.

**Trust and Integrity** – Comments evincing distrust toward the Forest Service and/or the prior or current Administration are among the most prevalent comments on the Advance Notice of Proposed Rulemaking. Respondents assert that the Forest Service should avoid making decisions in secrecy or with preconceived outcomes in mind. These respondents frequently comment that

politics should be kept out of the decisionmaking process. According to one respondent who uses the Tongass Forest Plan Revision as an example, the conceived failure of that planning process did not come from local decision authorities, but because the national office became involved in the decisions, decisions considered political but not applicable for the Tongass National Forest. This respondent sees this as proof that national level policies are politically driven, while local planning is based on science and what is best for effected citizens.

People state that the way the Forest Service handled the Roadless Area Conservation Rule has damaged its public relations and community support. One individual believes that local managers were pressured by higher management to identify roadless areas during development of the Rule.

At the same time, other comments reflect the public's suspicions regarding the motivation behind this round of comment. One individual alleges that this administration must be trying to get rid of the Roadless Rule, by sending it out for comment again. Along this same line, some say the Forest Service should acknowledge its bias toward resource users, claiming that the agency will screen out suitable roadless areas to be conserved, in order to satisfy consumer needs.

Both those who ask that the Rule be implemented, and those who ask that it not be implemented, assert that the Forest Service should work to regain the public's confidence. According to one individual, there have been times, especially under the Clinton administration, that the government seemed to do whatever it wanted, regardless of what the majority of people wanted. This person points out that it is hard to have confidence when people do not believe they are being listened to. Other respondents reference the fee demo program as an example of violating public trust, while charging permittees, such as grazing, under market value, the Forest Service seems to be taxing recreationists for low impact use of the land while resource users are subsidized for impacting the environment. (See the Executive Summary for a more general discussion of trust and integrity comments on the Advance Notice of Proposed Rulemaking vis-à-vis those on the Roadless Area Conservation Rule Draft EIS.)

## *The Forest Service*

### **195. Public Concern: The Forest Service Chief should retain decisionmaking authority.**

Chief Bosworth, you are the one who can decide for the common good, for the long-term. You and I both know that once the beauty and serenity of wild nature is gone, it is gone forever!!! We can't change our mind. Please do not let us lose any more of our fabulous national heritage of nature and wilderness!! (Individual, Denver, CO - #A11769.12122)

The role of forest level planning is to involve local public interest in advising and informing decisions on national forest management. Due to the need for informing decision making on the remaining small percentage of public lands represented by the roadless area conservation plan I feel the decision level [appropriate] for these lands is at minimum the Regional Forester and best at the Chief's level. (Individual, No Address - #A30117.13100)

#### **OVER ROAD CONSTRUCTION IN ROADLESS AREAS**

Retain any final decision authority to build roads in roadless areas with the Chief of the Forest Service. (Individual, Lyons, NY - #A1737.12122)

## **196. Public Concern: The Forest Service should decide the management direction for roadless areas.**

We expect you to manage our public lands. We expect you to decide, by yourselves, if necessary, on the correct course to take and then take it. You are not referees between competing relations or philosophies. You are professional land managers and we expect you to go out and manage the land. The only real mistake you could make would be to do nothing while the situation grows more desperate. (Business or Association, Spokane, WA - #A21364.12120)

Surely the primary responsibility of a conservation administration is to conserve; in particular, to preserve this precious American heritage that has survived since Colonial times. If the United States Forest Service will not protect these forest fragments, then who will . . . ? (Individual, Tallahassee, FL - #A6255.12120)

While we recognize the predicament the agency faces as land manager, it is still up to the management agency to make the final decision on how its lands will be managed. Clearly, the Forest Service would like to be all things to all people, but this is unrealistic. Simply put, the Forest Service must conduct a comprehensive analysis of the lands in question, take into account scientific data, take into account community needs, make reasonable land use decisions and accept responsibility for its management selection. If the decision is appealed or challenged through litigation, the Forest Service must only prove it made an informed decision. (Business, Denver, CO - #A29112.12120)

### **RATHER THAN CONGRESS**

The management for roadless areas should be maintained and managed by local forest service personnel under a code adopted by the Forest Service and not Congress. (Individual, Spring City, UT - #A25950.25240)

### **RATHER THAN POLITICIANS**

This continues to be an issue, which will impact Americans for centuries to come. Roads are necessary often become pathways of destruction for the forests. There continues to be individuals who destroy forest property wantonly or harass game or poach it. Careful consideration is essential. Political gesturing does not help. Please allow the Forest Service to make the decisions, not a lot of politicians. (Individual, Ventura, CA - #A7814.12120)

### **RATHER THAN THE PUBLIC**

We would like to emphasize that gathering viewpoints of all interest parties does not relieve the Forest Service of its duty to make management decisions based on what's best for the land and its inhabitants within the current framework and Congressional direction. Gathering comments from the public should in no way resemble or encourage a quasi-voting system. The direction for managing our nationally owned forests is given through our elected officials in Congress and managed by the Administration. The general public is not responsible or qualified to make decisions regarding these lands. (Business or Association, Portland, OR - #A19004.15150)

Competition for competing priority uses will continue to be an integral part of the management of the National Forests. This is proper, but the Forest Service must remember that in the end they are the agency that must make the decisions and implement the actions. Abrogating that responsibility based on input letters, polls, etc. is neither proper nor ethical. The closer to the action the better the final decision will be, which speaks volumes for delegating the decision to the local agency leadership provided they decide within the confines of approved policies and programs. (Individual, Seeley Lake, MT - #A8075.15160)

It is my impression that the Forest Service has very good skills in carrying on open public processes, but then has difficulty reaching and implementing decisions. Perhaps there needs to be a clearer delineation between the role of the public in commenting and the role of the Forest Service in deciding.

Unfortunately, that is precisely what we all thought the early NFMA planning regulations did, yet here we are today. (Individual, Spokane, WA - #A17819.15161)

**BECAUSE IT HAS A DUTY TO APPLY ITS EXPERTISE**

The agency needs to take a leadership position in managing the forests. The Forest Service has tremendous expertise in managing natural resources, and it has a duty to apply that expertise. Recently, the agency has explored various roles for itself in forest management, including those of facilitator. From the ski industry's perspective, it is crucial the Agency takes a leadership role in the management of NFS lands, whether it is at a planning or site-specific project level. The agency is not merely a participant in the process, it has a statutory duty to provide outdoor recreational opportunities to the public under NFMA, the Multiple-Use Sustained Yield Act, and the National Forest Ski Area Permit Act. As we witness an increase in involvement (in our approval processes) from other federal agencies with little or no experience in providing recreation, the leadership of the Forest Service becomes even more vital. (Permit Holder, Hood River, OR - #A13230.12120)

**AS PROFESSIONALS, RATHER THAN REFEREES BETWEEN COMPETING INTERESTS**

Forest policy should not be made by popular vote. The Forest Service has asked for substantive comments to help with decision-making on this issue. We expect you to manage our public lands using the best available science and substantive public input. We expect you to decide as professionals on the correct course to take and then take it. You are not referees between competing religions or philosophies. You are professional land managers and we expect you to go out and manage the land. (Business or Association, Coeur d'Alene, ID - #A22058.12120)

**BY DEVELOPING UNIFORM DIRECTION FOR THE PROCEDURES TO BE USED IN ROADLESS AREA MANAGEMENT DECISIONMAKING**

There must be regulations that aid Forest Supervisors and the plan revisions team that provide a consistent procedural approach to Roadless Area management.

The final rule of 1/12/01 erred in being a "decision document", unilaterally prohibiting certain activities in Inventoried Roadless Areas. The new procedural regulations should avoid making decisions and instead give uniform direction for the procedures to be used in making decision relating to Inventoried Roadless Areas. (Organization, Chesapeake, VA - #A11804.10130)

**BY CONDUCTING LARGE REGIONAL MEETINGS OF FOREST OFFICIALS TO DECIDE THE USE OF ROADLESS AREAS**

Regarding your second issue, that of working together, I offer no suggestions for solutions, but I do say that while small committees would seem to be the most efficient means of deciding issues, they are also prone to corruption or bias. I dare say that issues as important as the use and protection of our roadless areas demand to be treated with great respect and I wonder if large regional meetings of forest officials would be useful in deciding how best to use the areas. Large bodies of diverse, geographically scattered members would certainly be harder to corrupt or bias and would yield more productive discussions. (Individual, Cambridge, MA - #A11912.15000)

**BY ALLOWING EACH NATIONAL FOREST TO ASSUME THE LEAD RESPONSIBILITY FOR DEVELOPING MANAGEMENT PROPOSALS**

As the federal agency which has been charged with the responsibility for the administration and management of all National Forest system lands, each National Forest should assume the lead responsibility through the forest planning process to gather and compile the necessary data in a format which can then be presented to the general public, elected officials, other state and federal agencies, and other interested groups in an effort to arrive at a management plan that will gain the support of a majority of the various interested participants within the constraints of the various laws and regulations that are pertinent to the area. (Individual, Eagle, ID - #A3368.12100)

**BY GIVING THE DISTRICT RANGER GREATER DECISIONMAKING AUTHORITY**

Strengthen the staff and decisionmaking authority of the Ranger Districts. Districts should have the necessary specialists to do the work and know the land, animals, landscapes and the social economic environment with the District. Reaffirm the District as the doing level of the Forest Service and give the

District Ranger greater authority for decision making and carrying out plans. Planning at the District level should generally answer the how to questions using the best science, economic and social information available to do projects. (Individual, No Address - #A26264.12125)

**BY ALLOWING LOCAL FOREST MANAGERS TO HAVE COMPLETE DECISIONMAKING AUTHORITY**

Require the Forest Service line officers to make decisions about each roadless area at the local level after involvement with the public and other appropriate agencies.

We must bring the decisions about which areas should really be roadless and how they will be managed on an individual basis using the forest planning process with all the players involved. (Individual, No Address - #A20465.13110)

When not specified by law, in support of a more localized planning process, all forest plans, environmental impact statements pertinent to timber sales and other projects on a national forest, science based roads analyses and actions which meet compelling needs should be the responsibility of the Forest Supervisor, who should be the Responsible Official, not a higher level of authority. Specifically on the Tongass NF, the Forest Supervisor should be the Responsible Officer regarding determinations to harvest in inventoried roadless areas in order to meet the market demand requirements of the Tongass Timber Reform Act (TTRA). This is the level at which local knowledge is at its greatest. In addition, this returns authority and responsibility to the level where it belongs.

In the administrative process, all appeals of rulings by the Forest Supervisor would be to the Regional Forester who would be allowed to make the final determination. Additional remedies would have to resort to seeking redress in the Federal court system. (Tribal Corporation, Seattle, WA - #A20468.12125)

Most definitely, the activities that should be expressly prohibited are United States Forest Service national direction. Local forest planning professionals should be allowed complete authority to incorporate or exclude activities within such areas, after weighing and considering all public input. Plainly put, professional staff at the local level should have the competency and self-confidence to make these calls. (Business or Association, Cody, WY - #A19163.13214)

**197. Public Concern: The Forest Service should not give local forest managers greater latitude in management decisions.**

Do not give local managers of these federal lands greater latitude in management decisions. Along with what we create, our age will be remembered for what we chose not to destroy. (Individual, Boulder, CO - #A26125.13110)

**198. Public Concern: The Forest Service should insulate local officials from negative repercussions of decisions.**

This perpetual problem is best addressed just the way it was done in establishing the Roadless Area Conservation Rule. The only way to make such national policies work is to insulate local managers for decision-making. If you change the rule every time someone complains or, put the decisions in the hands of local managers who have to live with those who might disagree with the decisions is a guarantee that no rule will work. We have lots of experience with this approach, so perhaps it is time to learn from that experience. (Individual, Sebastopol, CA - #A2990.13120)

The current review is a not-so-subtle effort to return management decisions to local officials, a policy whose consequences are revealed by the scares of 400,000 miles of roads in our National Forests. Experience shows that decisions related to protection of roadless areas should be based on national policy, not the whim of local officials. In fact, the local officials need to be insulated from decisions made in the national interest that might be locally unpopular. (Individual, Sebastopol, CA - #A2990.13120)

**199. Public Concern: The Forest Service should clarify its authority and relationship with Congress.**

The Forest Service should not blur the separation of powers among the 3 branches of government by having Congress validate rules of local forest plan revisions. Congress should set general policy in laws and the executive branch (in this case the F.S.) should implement and operate under those policies, via rule adoption and action. (Individual, Olympia, WA - #A8793.12100)

**200. Public Concern: The Forest Service should clarify the discretionary authority of the responsible official.****AND CEASE DELEGATING AUTHORITY TO THE RESPONSIBLE OFFICIAL WITHOUT REGULATIONS REQUIRING AN EIS AND PUBLIC COMMENT**

Responsible official's discretion for future road decisions are too broad. Coeur supports a management approach that provides for site-specific flexibility. Under this proposal the "Reasonable Official" would have unlimited discretion in determining when additional protections should apply to inventoried roadless areas or when unroaded areas should be placed off limits to future roads. It is also unclear if this discretion of the Responsible Official would be subject to public comment, review, and appeal procedures. Coeur opposes this delegation of authority to the Responsible Official without clear regulations in place requiring preparation of an EIS, and opportunity for public comment. (Business or Association, Juneau, AK - #A23080.12125)

**201. Public Concern: The Forest Service should adhere to its agency mandate.**

Forest Service should have a mandate that was part of their creation and the winds of political opposition should not sway that mandate, if not in fact created as of yet, one should be created and never swayed by **any political force**. Compliance with mandates of agency could be used as defense in litigation if approved by Congress. Each Federal Agency has a mandate and should not be used to provide more for one agency such as Forest Service Land being conveyed to Wilderness Designated Areas. Preservation works both ways. (Individual, Lacey, WA - #A17762.15160)

***The Legislative Branch*****202. Public Concern: Congress should manage federal lands.**

For several years the public has been pushed into one plan after another, one battle after another . . . all rulemaking should be suspended until one grand plan that incorporates and encompasses the entire process is created. Such a rule should then be brought before Congress to become law, such as the Federal Land Management Policy Act. Rulemaking is a job for our elected officials who truly represent the people. (Individual, Sun Valley, NV - #A30102.10110)

Federal land in general and the roadless issue in particular should be decided on a federal level in Congress where all people from all states are represented. To allow federal land use policies to be dictated by local and state governments usurp our rights as citizens to have national issues decided democratically. (Individual, Kalispell, MT - #A26974.13120)

I believe that an act of Congress should be required to designate future roadless areas or implement any sweeping changes to the public lands use policy. (Individual, Mayfield, UT - #A6629.12120)

An extensive collection of comments have already been provided on this subject to the Administration concerning this matter.

Since President Bush and special interest groups evidently disagree with this Record of Decision (published as part of the final rule, 36 CFR Part 294, Special Areas; Roadless Area Conservation, on January 12, 2001 at 66 CFR 3244), this matter should be handled by a Congressional Subcommittee for review with legislation designed for a vote. (Individual, Bethel Park, PA - #A29859.12130)

This initiative goes against the core mandate of the Forest Service, to manage forests. This initiative is not the way public land policy has been made in the past and should be made today. The best way to get the issues aired is through hearings headed up by our elected representatives, such as in a congressional debate over a wilderness bill. Otherwise the Forest Service becomes the mere political plaything of pressure groups and environmental extremists. (Organization, Missoula, MT - #A28141.12100)

#### **TO ALLOW INPUT FROM CONSTITUENTS**

Congress should be involved in any Roadless plan so the people the Congressman represents can have input. (Individual, No Address - #A457.12130)

#### **TO ADDRESS LOCAL CONDITIONS**

Forest planning should only be done through elected representatives using constitutional principles. Our representatives should direct you what to do—not vice versa. The local representatives should be the ones to determine local conditions where possible. I, or my proxy (local Representatives and Senators) should not have a say in what is done in Vermont any more than Vermont should have a say in what is done here. (Individual, Ogden, UT - #A494.13110)

#### **TO ALLOW A CHANGE IN MANAGEMENT DIRECTION WITH EACH ELECTION, AND TO END THE PRESENT STALEMATE OVER ROADLESS AREA MANAGEMENT**

Designation of these Roadless Areas is a POLITICAL decision. It is not dependent on the physical or biological characteristics of the site. Therefore, I feel that the Forest Service should identify the areas that meet whatever criteria are established for Roadless Areas, display the resources of the areas evaluate the environmental effects of designation of the area and have the local Congressman designate the area establishing whatever management direction they feel is appropriate. If there is enough dissatisfaction within the Congressional District the next election can address the issue. In this case the agony of an unpopular decision will only last for two years [with] the local community. The Congressman can be defeated in the next election and the process can be redone. As it is now we seem to be in an eternal stalemate with no end in sights. (Individual, Olympia, WA - #A278.12100)

#### **TO MAINTAIN CONSISTENCY IN FOREST PLANS**

We need long-term funding and infrastructure for maintenance, timber stand improvement and prescribed burning. Have all decisions go to Congress for approval, so there is consistency in the plans, unchanging under different administrations. (Organization, Reno, NV - #A5987.17100)

#### **DUE TO THE POLARIZATION OF THE ISSUES**

This effort started as a political effort by President Clinton and VP Gore. It was then passed on to the Forest Service to make it legally proper. Unfortunately, I cannot believe that this issue is ever going to be resolved, either nationally or locally. Agreement is impossible due to the polarization of the issues and there will never be total agreement on how much wilderness or natural area is needed. If a national solution is possible, it should be made by Congress, not by administrative order. (Business or Association, Colville, WA - #A3091.12130)

### **203. Public Concern: The Forest Service should recognize Congress's authority to create, modify, or terminate withdrawals of public lands.**

#### **TO ENSURE THE CONTINUED INTEGRITY OF NATIONAL RESOURCE MANAGEMENT SYSTEMS**

Based on comments made by the Clinton Administration, this plan appears to be a thinly veiled attempt at turning what should be a public process into a political one. In efforts to push the plan through as quickly as possible, both public input and Congressional approval were ignored and denied despite legal requirements. According to the Congressional Record of the 94th Congress-Second Session 1976, House Report NO. 94-1163, pg. 6183, FLPMA reserved to the Congress the authority, "to create, modify, and terminate withdrawals for national parks, national forests, the Wilderness system, Indian reservations, certain defense withdrawals, and withdrawals for National Wild and Scenic Rivers, National Trails, and for the "national" recreation units, such as National Recreation Areas and National Seashores. This will insure that the integrity of the great national resource management systems will remain under the control of the Congress." (Business or Association, Boise, ID - #A20607.12220)

**204. Public Concern: Congress should review all land use policies adopted by the Forest Service.****SO THAT THE PUBLIC CAN HEAR THE DEBATES**

All land use policies adopted by the Forest Service should be reviewed by congress and passed into law through the resolution and not the veto process by congress. It is in this best regard that the rights of the public will be protected and not destroyed by an out of control federal agency or a dictatorial president. It allows the debate to be heard by we the public and it holds our representatives accountable. (Individual, Napa, CA - #A7093.12130)

**205. Public Concern: The Forest Service should make recommendations regarding forest management to elected representatives for their approval.**

USFS plans and recommendations should be made to our elected representatives with clear, concise economically derived choices using defensible, peer reviewed science and management techniques. Our elected officials must then decide jointly with the USFS any significant/recommended management action. . . . The elected officials should have power to determine the priority of various forest projects, be reviewed regularly as to the progress of said projects, and determine whether a project shall proceed or not. (Individual, Libby, MT - #A10531.12151)

**206. Public Concern: The Forest Service should submit forest plans to a local vote, then submit voter-approved plans to Congress for approval.**

Forest plans should not prevent resource development or place unnecessary burdens on mining, timber harvesting, or recreation. Forest plans should be voted on by voters in the local jurisdiction, then the vote-approved plan submitted to Congress. (Individual, Albuquerque, NM - #A10497.25000)

*State, County, and City Governments***207. Public Concern: States should manage federal lands.**

Roadless areas do not necessarily need to be protected by a federal bureaucracy. What would be more useful, in my mind, would be to turn all federal land back to the states and let them manage it in the way they see fit. Communism believes there is an elite group that knows what is best for society and that they—we should just turn everything over to that group and all will be well.

DIDN'T WORK IN RUSSIA. HASN'T WORKED HERE OR YOU WOULD [NOT] BE ASKING THESE QUESTIONS. (Individual, Hamilton, MT - #A94.12150)

In Nevada we have a limited quantity of privately held ownership of lands. Consequently, we are sometimes "dictated to" by Federal edicts. I believe that individual States representing the people in their states should determine the use of those public lands within their boundaries. (Individual, Carson City, NV - #A1065.15130)

I believe that each state should have the ability to make the best decisions regarding the use of public lands that reflects the views of local residents. More local control of public land use by individual forest service managers is needed. The forest service should look at who the decision affects the most. A greater consideration, regardless of the numbers, should be given to local residents, governments and communities when making a decision that affects public lands and resources. A very minimal consideration should be given to the view of those who do not live in the area affected, regardless of the number of comments. (Individual, No Address - #A21353.13110)

Every state should control their own forests. (Individual, Polson, MT - #A1679.15130)

I believe that each state should have the ability to make the best decisions regarding the use of public lands that reflects the views of local residents. More local control of public land use by individual forest service managers is needed. (Individual, Price, UT - #A26952.12150)

**208. Public Concern: The Forest Service should not allow local government entities to have a role in decisionmaking.**

**BECAUSE EXCESSIVE LOCAL CONTROL LEADS TO EXPLOITATION-DRIVEN POLITICAL PRESSURE**

If, by “local,” the question means government entities other than federal, these bodies should have no role in decision making. They can and should make suggestions and recommendations, but should have no part in final management decisions. History has demonstrated that excessive local control leads to exploitation-driven political pressure and over harvesting, with little attention to scientific resource management. That characterizes the Forest Service’s past; we should not backtrack to previous days of failed management paradigms. (Individual, Missoula, MT - #A17700.15130)

*Other*

**209. Public Concern: The Forest Service should allow various groups to be decision makers.**

**DISINTERESTED, UNAFFILIATED INDIVIDUALS**

Decisions should be made by a group of individuals whose interests and affiliations include even proportions of all involved groups. Decisions should not be made by single individuals whose biases and personal opinions will sway the decisions. (Individual, Saint Louis, MO - #A629.12000)

**A COMMITTEE OF EXPERTS**

I am a strong believer that a committee of experts is the best way in evaluating a protection area especially if it is public grounds. Most definitely the local forest agency should be part of evaluation. (Individual, Vancouver, WA - #A389.12100)

**SCIENTISTS AND OTHER FOREST SERVICE SPECIALISTS WHO WORK WITH THE LAND**

I believe that evaluating the needs of local forests should definitely fall on the shoulders of those scientists and other forest service specialists who work and live with the land. Who else could possibly be better qualified to determine these needs than those who tend to them daily? (Individual, Eagle Creek, OR - #A29956.15169)

**A PANEL OF APPOINTED PEOPLE REPRESENTING DIFFERENT INTERESTS**

With all the varied values and considerations perhaps the Forest Service should not be the final authority on designating roadless areas but a panel of appointed people representing the different factors. No one is happy with a compromise but at least the Forest Service would not have to take the total blame. (Individual, Ogden, UT - #A2288.12100)

**A COMMITTEE APPOINTED BY COUNTY COMMISSIONS**

Each forest should have a 9 member “ground truthing” committee out of 18 nominees initially selected by the county commissions in public hearings, apportioned according to population. These people will be elected in the general election, with the person gathering the most votes chairing, paid by the Forest Service to go out on the ground for a year as a team, paid the prevailing wage with benefits, with a deadline to hammer out a package for voter approval. Equip these teams with GIS and other mapping equipment, supply timber cruisers and other forestry/biology professionals on demand, and the authority to make a decision. (Individual, Whitefish, MT - #A13242.15152)

## *Trust and Integrity*

### **210. Public Concern: The Forest Service should maintain high ethical standards.**

The Forest Service would be less torn if it maintained solid standards of resource protection and didn't pretend that the public is its "customer". Too often, biologists, hydrologists, and ecologists are muzzled because the district ranger, supervisor, or regional forester has made a decision based on politics, connections, ambition, or even personal financial self-interest . . . Standards of ethics are badly needed by your agency at the upper levels. (Individual, Victor, ID - #A20625.12230)

Very strong guidance should be provided from the Washington office in regard to ethics and fairness and ensuring that the same is carried out in all land use decisions. Beyond that wide discretion should be given local managers. (Individual, Ellensburg, WA - #A17772.13100)

### **211. Public Concern: The Forest Service should avoid making decisions in secrecy.**

#### **REGARDING MANAGEMENT OF ROADLESS AREAS**

It came as a surprise to Forest Service employees and the general public when President Clinton announced the Roadless Initiative on October 13, 1999. The Forest Service field units were not consulted, nor was their Union consulted as to possible employment impacts. At the time of that announcement, it was not known which areas were being considered.

On May 8, the Draft Environmental Impact Statement (DEIS) was released. Again, the upper management of the FS strictly forbade any release of information prior to that date, and no one knew which areas were going to be proposed, nor what the proposed management of those areas was going to be. Some attempt had been made by local Forest Service offices to determine roadless areas suitable for the President's announcement, but that information wasn't used in the DEIS.

Consequently, the May 8 DEIS came again as a surprise to Forest Employees as well as other publics who were not consulted on which areas were to be considered. The DEIS's inventoried roadless areas (IRAs) were mainly selected by using the RARE II areas that were inventoried over 25 years ago. This past inventory was a result of a report to Congress as an outgrowth of the 1964 Wilderness Act. As a result of that report, about 40 million acres (22%) of the National Forests were made into Wilderness Areas. 54 million acres (28%) of the National Forest lands were inventoried by RARE II, but Congress has elected not to make these into Wilderness Areas and it was expected that these non-designated areas would be converted back to multiple use. But these were the areas that the Administration selected as IRAs in its new Roadless Initiative. (Union, No Address - #A28881.10135)

### **212. Public Concern: The Forest Service should avoid making decisions based on preconceived outcomes.**

We think that keeping open lines of communications, listening to concerns, and responding to them, are the keys to laying a foundation for mutual cooperation on these issues. . . Ultimately, the Forest Service must keep an open mind about the issues before it, and must not come to the table with preconceived positions or outcomes in mind. Many of the concerns raised by the state, local and tribal governments, as well as industry and other organizations, about the roadless rule as published on January 12, 2001, came directly from a belief that the process that preceded that final rule was a predetermined outcome in mind; the ultimate shutdown of the lands, regardless of the impact on localities, and regardless of the health of the actual forests. (Business or Association, Washington, DC - #A6211.15100)

### **213. Public Concern: The Forest Service should keep politics out of the decisionmaking process.**

Please no Politics. This is too important and you're in a position to make a non-political decision. (Individual, Mesa, CO - #A13738.10160)

Over half of our public lands are open to exploitation. Let's be good stewards and protect the other half from this political tug of war. These magnificent forests and the diverse wildlife they support are neither Republican nor Democrat, nor should this be our agenda when deciding its fate. (Individual, Whitefish, MT - #A13343.10160)

The failure of the planning process of TLMP and its revision, comes not in the local planning process, but in the national political arena to summarily dump years of heartache among stakeholders, who bought into the process to develop those plans, in deference to a national political agenda. This political route was chosen over the recommendations and decisions of the local planning effort, which proved that the system in place could work, especially when based on science not politics. (Business, No Address - #A29718.12200)

Decisions on forest management plans and projects must be based on credible science, local knowledge, and professional experience, not on political objectives supported by the counting of pro and con public comments. When I was a District Ranger, I knew of no law, regulation, or policy that directed me to make a decision based upon the number of comments received. Public input and participation in the project was to assure that the planning team and line officer were fully knowledgeable of the project resources and impacts, yes. Counting votes, no! The Forest Service has lost its credibility on this issue. (Individual, Ketchikan, AK - #A28983.12230)

Consider that you spend days reading material from the forest service, took time from your work to attend special public hearings and made great efforts to participate in a specific, concrete way in federal decision-making. Then, as soon as a new President comes in, you find that the rule representing that body of comments is being suspended until it can be completely reconsidered and rewritten, with the clear intent to overturn the integrity and intent of the whole decision. You would feel angry, cheated, and cynical about the words in the new pronouncements speaking about Science and Public Participation when it seems so obvious politics. (Individual, Grass Valley, CA - #A23575.12200)

First, it should be established once and for all time that the national forests and all their resources are permanent reservations which must be managed according to permanent policies that are based on merit and science and not politics. Some of the problems facing the Forest Service and the lands it manages have been created by irresponsible politicians, congressmen and presidents, such as the destructive aspects of logging, mining, and ranching, for over a century. These are our lands, held in trust for us by the federal government in perpetuity. National Forests are not the personal Monopoly board of the president, his flacks in the Department of Agriculture, and the Congress to play with at the whim of special interest groups.

Now we are confronted with an all-out-assault on our public lands, including the national forests, by a president intent on opening the gates for all the extraction industries—oil, gas, mining, and logging, because they ponied up an estimated \$40 million for his campaign for non-election, and now it's payback time. Why should the American taxpayers have to close ranks and fight every anti-environment, pro-mega business president who comes along and assaults our public lands, as we did under the Ronald Reagan attacks? Why can't we enjoy the security of permanent public policy which will manage and preserve our public lands for our enjoyment and generations yet unborn, much as we enjoyed the security of the Social Security Trust Fund before the politicians began dipping into it for their own purposes? (Individual, Loveland, CO - #A9080.12200)

**214. Public Concern: The Forest Service should consider that the way it handled the Roadless Area Conservation Rule has severely damaged its public relations and community support.**

The Roadless Area Initiative is very controversial, both inside and outside the Forest Service. It has magnified the conflict between the urban environmental community and other national forest users. The battle lines are drawn. On one side is the federal administration and every environmental organization;

on the other, every rural state and its governor, every county board, hunters, recreation vehicle users, and logging and mining associations.

The Roadless Area issue is steeped in controversy. The decisions that led to this initiative were not open and transparent. Only one group of forest users was consulted, and the other side was clearly and intentionally locked out of the process. No effort has been made to consult local Forest Service decision-makers. The local Forest Service staff is caught in the middle. Forest Service employees live in rural communities affected by the Roadless Area Initiative. Because of the way this initiative was handled by the federal administration, the level of distrust toward the Forest Service and its employees has reached an unprecedented level. A little bit of consideration by the Administration for Forest Service-community relations could have gone a long way toward diffusing the heated situation. As it now stands, the damage that has been done to Forest Service public relations and community support may take years to repair and rebuild. (Elected Official, Catron County, NM - #A15538.14120)

While Forest issues have often been steeped in controversy, the Roadless Area issue festers like an open sore on the Forest Service horizon. Why did this come about? Largely because of the Administration's manipulative political maneuverings, the issue is lopsided, raw, and offensive. The decisions that lead to this initiative were not open and transparent. Only one group of Forest users was consulted, and the other side was clearly and intentionally locked out of the process. There was no effort by the Administration to gather consensus or agreement. There was no effort to consult with the Union. This is an example of politics at its worst.

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.

We are asking that a moratorium be placed on this initiative and that all sides initiate honest communication to diffuse this unpleasant situation. (Union, No Address - #A13245.10120)

**215. Public Concern: The Forest Service should consider that local managers felt constrained to identify roadless areas during development of the Roadless Area Conservation Rule.**

The Superintendent of [a national forest] stated in the public meetings in this area, that he had been tasked to come up with some "roadless" areas for the Roadless Initiative project. In response, his staff pulled out some studies from the 1970s in which certain areas had been identified as candidates for "roadless" designation. He further remarked that, as anyone can plainly see, these areas were not roadless in the 1970s and contained more roads now than then. Nonetheless, these were the areas that were designated as "roadless" because he had to designate something due to orders from higher headquarters. As one of his staff later remarked, this whole episode "marked a low point in our careers". Within the designated "roadless" areas were numerous private parcels of land which would require access to be maintained by existing roads. (Q1 and Q5) Also, these areas contain numerous double and single track trails that are open to motorized use. (Individual, Ruidoso, NM - #A17775.45512)

**216. Public Concern: The Forest Service should address the public's suspicions regarding the *real* motivation behind this round of comment.**

I am one of the 1.6 million citizens who submitted written comments on the roadless initiative, and one of thousands who testified at well-publicized meetings. The vast majority of testimony supported keeping inventoried roadless areas roadless, so I question the real reason for this second round. I am suspicious that it may be an attempt to overtrun the roadless rule because:

1. The Republican controlled/ Bush administration has been relentless in its assault on every aspect of the environment - air, water, endangered species, preserves, as well as the roadless initiative.

2. The pathetic defense the Justice Department presented, and the absence of Forest Service representation, at the Idaho suit against the Forest Service over the roadless initiative. This was a suit against the Forest Service, which was denied the opportunity to respond, substituting Bush-controlled Justice Department lackeys instead.
3. The government's decision not to appeal this decision.
4. The difficulty in obtaining the questions that format this response.
5. The complexity of these questions, which will discourage participation by citizens in favor of responses by funded extractive and exploitative industries and organizations (e.g. lumber, mining, snowmobile, ATVs). (Individual, Lolo, MT - #A111.10000)

It is evident that the ANPR has a strong bias for abandoning the Roadless Rule in favor of the Forest Service's traditional forest-by-forest planning process. The ANPR failed to mention that the Rule was developed with the most extensive public participation ever in a federal rulemaking process. The ANPR instead just focuses on the allegations in lawsuits that "there was inadequate opportunity for public review and comment on the roadless rule." Does this mean that the administration is completely ignoring the support of 1.6 million people who want to see roadless areas protected? Furthermore, the ANPR questions the legal adequacy of the environmental impact statement for the Rule. The ANPR states, "it is difficult, and perhaps infeasible to collect in a short timeframe, on a national scale, the local data needed to produce a sufficient EIS that analyzes all relevant information or that proposes an adequate range of alternatives." But the Bush Administration is utilizing the same type of time line, and places the comment period during the summer months. (Organization, Bozeman, MT - #A15467.14400)

Personally, I feel the current public comment period is redundant and wasteful, considering the fact that the first round of roadless was the single largest public involvement campaign the Forest Service has ever conducted. The reasons given for undertaking this process are vague and misguided. (Individual, Lewiston, ID - #A29569.10152)

## **217. Public Concern: The Forest Service should acknowledge its bias toward commercial interests.**

The ANPR implies that local decision-making is needed because protection is warranted for some roadless areas but not others. It states that most roadless areas previously were not recommended for wilderness designation due to low wilderness values, inadequate public support, or "other resource potentials". It observes that the resource values of roadless areas "vary in importance"; specifically pointing out that roadless areas contain 9 million acres of "productive timberland". These statements exhibit the anti-wilderness, pro-timber mentality that has eroded public trust in Forest Service planning and created broad support for national regulatory protection of roadless areas. If the Forest Service is going to claim some roadless areas have low wilderness values and measure their importance as sources of timber, they should disclose that this is a bias to commercial extraction that is not based on science. (Organization, Spokane, WA - #A18013.12230)

The Forest Service can work with individuals and groups with strongly competing views, values, and beliefs in evaluating and managing public lands and resources by managing all existing roadless areas as nonmotorized, nonlogging, nonmining areas. Then the Forest Service can look at the remaining majority of federal lands and determine appropriate areas that can be reclaimed as roadless and reclaim it. The remaining area would still be the majority of federal lands. Manage that as you have, which means logging, roading, and general exploitation by industry. Industry would still have control of more than half of the public lands. That should be enough. Maybe the remaining roadless lands will be sufficient to provide a minimum amount of healthy forests, wildlife habitat, fisheries, water quality, clean air, and wildlife recreation for humans, while industry plies its trade on the rest of the federal land, as it always has. Wouldn't that be fair? Protect, say 40% of healthy forest by keeping industry and Forest Service "managers" out. Allow the rest to be pillaged as it has been for 40 years. Better yet, put the Forest Service in charge of the industry land and a new conservation-oriented agency in charge of the wildlands. How about it? Shouldn't 60% of the land be sufficient for industry exploitation. I'd make the

trade, right now. How about you? Oh, I see. You want it all. Well, therein lies the rub. Until you realize that greedy little side of your agency and industry, then do something about it, you'll never get people together. (Individual, Libby, MT - #A14047.10150)

My concern is that the timber industry provided a lot of input to these questions to guide the discussion away from ecological values and toward economic values. My concern is that you are disregarding 1.5 million comments in favor of preservation. My concern is that this administration could care less about our planet and only want big profits for rich people, at any cost. My concern is that the outcome of this discussion is a foregone conclusion and you are going to sell out. (Individual, Corvallis, OR - #A2352.12210)

### **218. Public Concern: The Forest Service should avoid asking the same questions until it gets the desired answer.**

I have read your questions regarding the proposed changes. I think another question is far more important, and that is: **Why are you second-guessing a plan that was established based on two years of effort, over 600 public hearings, and the input of 1.6 million people?**

The current roadless rule is an excellent plan, with enormous compromises already built in to come as close as possible to satisfying all factions. It was established based on a long, arduous, and bipartisan process. For you to turn around and say "oh, a few of us don't like the results so we will try again" is highly offensive to all who worked for, and supported, the bipartisan compromise currently in place.

My father got a degree in chemical engineering just before the start of World War II. During the war he worked in a plant which made tetraethyl lead, the gasoline additive which of course was crucial during the war. Part of his responsibility was helping to monitor the ambient levels of lead in the factory (since of course lead is a poison). When the numbers his group obtained were too high, managers above them responded quickly-by saying "go back and try again". He was sufficiently disgusted to leave the field of engineering; after the war he got his Ph.D. in chemistry and taught at the University of Florida for the rest of his life.

Your proposal to modify this carefully considered, well crafted plan reminds me of those managers who by fiat overturned the careful measurements of competent engineers. (Individual, Greensboro, FL - #A18256.10152)

### **219. Public Concern: The Forest Service should work to regain the public's confidence.**

It seems the open meetings and comments in writing are very good ways of communication. My concern and the concern of others is whether or not the federal gov. pays attention to what we say and what the people want. There have been way too many times, especially under the Clinton administration, that the government just did what ever it wanted, regardless of what the vast majority of people said. Somehow, confidence must be regained so that we the people feel like we are actually being listened to. (Individual, Stevensville, MT - #A17902.10131)

#### **THE FOREST SERVICE CHIEF**

Following are the comments of the Park County Environmental Council in support of the Roadless Conservation Rule signed into law in January of this year. As requested in the process laid out by the Bush administration's new Forest Service, our group presents the following answers to the questions composed, presumably by your staff. Though most of these questions have been more than adequately addressed in the FEIS produced by your predecessor, and these questions, we believe, are an attempt to confuse the public and provide a tactical avenue for delaying progress in protection of the public's last remaining roadless lands, we nonetheless will complete this task. Our group is disappointed in you, Chief Bosworth, for your blatant retreat from your respected position as a steward of the land to your new role as political puppet. Our group has difficulty with your apparent lack of integrity and we can only ask, what or who has co-opted you? The public is not as ignorant or naive as many in your administration seem to believe and this episode will only add to the discredit that accumulates daily from actions taken by your administration. We ask that you make every effort to redeem yourself and restore

our confidence in you by supporting the rule as it stands. (Organization, Livingston, MT - #A19219.12230)

#### **BY MAINTAINING ITS OBJECTIVITY**

Everyone must have equal access to the process and equal opportunity to express their views. We hope the back-room deals at the national level, which marred the initial rule making, are things of the past. The word “collaboration” carries a negative connotation, one of cozy deals and distorted information favoring one point of view or another. Decision makers must maintain their objectivity and assure a lack of bias in data collection and its use. The image of your agency has been badly tarnished by real or perceived coziness with special interest groups. The NEPA process was corrupted in the rush to complete massive national initiatives before the last administration left office, becoming a means to confirm decisions already made. The Forest Service as an agency will have to prove its professionalism before re-earning the public’s respect, especially at the local, adjacent community level. (Business or Association, Olympia, WA - #A3619.12120)

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#### **BY BEING HONEST ABOUT THE ROADED/UNROADED STATUS OF AREAS**

Unfortunately, in our community, the Forest Service and their representatives have lost all credibility on this issue. Why? Because the most basic rule in public relations is to tell the truth, and the Forest Service representatives did not tell the truth.

While there are many instances of this, the two key untruths told by Forest Service representatives were that: 1) Certain areas that are designated “roadless” in fact have roads, and some have been clear-cut at least once and 2) Areas improperly designated as “roadless” which in fact have roads, could be reclassified as “roaded” areas. This was fundamentally dishonest of the Forest Service and its representatives.

Several of your questions concern how the Forest Service can best work with often time competitive users of Forest Service administered lands. You can only do that by maintaining your integrity as a professional organization. Otherwise you simply are a pawn of whatever happens to be politically correct at the moment, a servant of those who believe that their “end justifies the means.”

To regain your integrity on this issue it is necessary to acknowledge that some of the “roadless” areas were improperly classified, and rectify the situation. If you have integrity, with time you will be able to resolve the other problems, even if it sometimes means telling people things they don’t want to hear. But without integrity you cannot get the support that you need from the reasonable majority of people who are on the middle ground of most issues. (Individual, Markleeville, CA - #A15429.12230)

There is a great deal of frustration in North Dakota because the rulemaking and forest planning process has failed to honor the promises made about collaborative decisionmaking. Instead, the western counties face a shrinking economic base, threatened by cuts in livestock grazing, unavailability of land for future energy development, denial of royalty rights, and continued conflict over what the United States originally promised. If the agency has predetermined the outcome, no amount of process is going to make the decision any more valid. Moreover, we do not believe that process will address the flaws nationwide based on the experience in North Dakota. Unless and until the Forest Service is willing to reconsider the roadless policy by recognizing these areas are developed and have roads, then the Forest

Service is condemned to continue to make the flawed decisions and to further alienate the public that the agency allegedly serves. (Elected Official, McKenzie County, ND - #A27737.12200)

#### **BY CONSIDERING PUBLIC CONCERNS AND MANAGING USERS AND RESOURCES FAIRLY**

The Resources Planning Act/National Management Act provides the US Forest Service with many opportunities. Sadly, they have been squandered. The fault rests mostly on the shoulders of the Service itself, which has failed to provide responsible leadership.

The US Forest Service was once one of the most highly regarded of federal agencies. In the recent issue of High Country News Publishers, Ed Marston writes “The Forest Service organization, that has been publicly humiliated for the last 15 years by environmentalists, by the courts, by industry and by Congress. It is an agency that has lost to those interests the only power that counts: The power to manage its 300,000 square miles of land.” How the US Forest Service manages roadless lands over the next twenty or so years will significantly determine whether stature rises or humiliation continues. And perhaps whether the US Forest Service continues to exist at all.

Some times spent generating this response and I ask that you give due consideration. I have been to a few dozen events where a Forest Service executive remarked that everyone seemed angry with the Service or disagreed with them and this indicated to the forestry agent that they (USFS) were doing something right. Can you imagine a bank executive saying, “Since all of our customers are angry with us, I must be doing my job well.” A common response to public input is something like this. “Well, everyone has an opinion, you know.” I always take that to indicate the government agent making the comment ignores good suggestions along with bad. The reality is worse, of course. The United States Forest Service has been inclined to ignore good advice and follow bad. (Individual, Colville, WA - #A20889.12230)

The other day I was talking to an older, local community leader in our rural area. We don’t agree on resource management. But we were talking about how federal land managers insisted that old growth stands of timber needed to be converted to young, vigorous stands of timber just a decade ago, and now those same managers tell us it is important to protect old growth. We both agreed those managers were either wrong then or they are wrong now and those forest managers don’t have much credibility. We don’t take what the US Forest Service says very seriously.

How can you take an agency seriously when they want to charge owners of the lands five dollars to take a three hour hike and a dollar and thirty five cents for a rancher to graze a cow with a calf for a month? How can you take an agency seriously when they tell you to camp two hundred feet from a stream and allow cattle to stomp down the same stream banks and crap in the stream? The majority of Forest Service campgrounds are perched right on the shores of lakes, rivers and streams. How do you expect anyone to take what you say or do seriously? (Individual, Colville, WA - #A20889.12230)

#### **220. Public Concern: The Forest Service should honor existing agreements between citizens and the government.**

Existing agreements between citizens and government should be respected at all costs. Where such agreements have been violated by the government, citizens should be duly compensated. A government, which violates either contract or Constitution, is by definition a tyranny. It cannot stand, and with its demise will die all the good it had hoped to accomplish. (Individual, Modesto, CA - #A14006.12200)

#### **221. Public Concern: The Forest Service should be abolished or replaced.**

There is precious little real, on the ground management being done anymore. In fact, insofar as I can see, even the so-called professionals at the upper echelons of administration—including Forest Supervisors and District Rangers are so deeply imbedded in the protectionist movement that they can no longer see the viewpoints of the rest of us, and worse, they don’t care. When a Forest Supervisor can tell me to my face that a recent fire in an area of over 50,000 acres left individual canyons without so much as one seed tree within 10 miles, but that he couldn’t manually reseed the area because of various restrictions placed on him by “higher authority”, and then immediately turn away and vociferously support the roadless plan of Clinton’s, then I think either he is the world’s largest hypocrite, or he is particularly

stupid, and in either case should be replaced. Perhaps the problem is with the forest Service itself . . . perhaps it should be replaced, or simply abolished. (Individual, Pendleton, OR - #A666.12230)

## Local vs. National Decisionmaking

### Summary

**Local (Forest level) Decisionmaking** – Some respondents ask the Forest Service to define what and who comprises “local forest planning.” These people state that virtually all national forests span numerous counties, local jurisdictions, and in many cases, state boundaries. Thus, explains one individual, the ramifications of decisions made at the ‘local’ level do not remain at the local level. This person explains that the cumulative impacts of site specific decisions are far reaching and can not be made on a site by site basis without taking into account the impacts on all communities and the environment, not just the local one.

Some respondents do not find the distinction between local and national decisionmaking problematic and advocate that decisions be made at the local (forest) level (see also Chapter 1: National Roadless Protection – General Remarks: Need for the Roadless Area Conservation Rule: *Do Not Implement the Roadless Area Conservation Rule*). Individuals, businesses, lands rights organizations, recreational motorized organizations, industrial associations, special use permit holders, and county commissions offer a number of reasons why decisionmaking should occur at the local level. They assert primarily that it is not the role of the Washington Office to micromanage resources; that local decisionmaking is required by the National Forest Management Act; that only local decisionmaking can adequately respond to the unique conditions and needs of different areas; that local residents have the most knowledge about the resources and the most to lose if a bad decision is made; and that resources available in roadless areas are vital to adjacent communities. Following this line of reasoning, some respondents state that individual national forests should be allowed to opt out of the Roadless Area Conservation Rule.

Others comment that no national forest should be exempt from the Roadless Area Conservation Rule. These respondents question the value of “local expertise” as opposed to that of professional Forest Service specialists, and ask how local expertise will provide more reliable information than was gathered for the Rule.

**Local (Forest Level) Decisionmaking with National Guidance** – Most who address the issue of local (forest level) decisionmaking with national guidance urge the Forest Service to ensure that local forest planning adheres to the Roadless Area Conservation Rule. Others state that the Forest Service should establish general guidelines for the consideration of roadless areas while allowing exceptions as approved by the Secretary of Agriculture; while allowing forest supervisors to nominate areas suitable for a roadless designation; while allowing forest plans to allocate lands; while allowing forest plans to address specific forest activities that are both feasible and sustainable; or while allowing forest plans to determine the relative merits of their roadless areas and need for roads.

**National Decisionmaking** – Respondents believe that decisions regarding management of roadless areas should be made at the national level (see also Chapter 1: National Roadless Protection – General Remarks: Need for the Roadless Area Conservation Rule: *Implement the Roadless Area Conservation Rule*). These respondents point out primarily that national forests are national resources “and should likewise be governed by a national policy;” that decisions

should be in the best interest of the whole country; that a uniform policy is needed; that local interests are too often tied to profit of local interests and do not represent the collective will of the state or the nation; and that the forest planning process has failed to adequately protect roadless areas. According to one organization, the administration extols the local forest planning as a highly collaborative process but does not point out perceived past failures of the forest planning process to protect roadless areas, as shown by allowing roads to be built in the remaining roadless areas. According to some, management decisions should be made *only* at the national level.

### *Local vs. National Decisionmaking General*

#### **222. Public Concern: The Forest Service should review the Western Governors Association 1999 Policy Resolution, *Principles for Environmental Management in the West*.**

##### **FOR GUIDANCE IN RESOLVING THE TENSION BETWEEN NATIONAL AND LOCAL FOREST PLANNING**

Strategies and decisions regarding protection and management of inventoried roadless areas should be made during local forest planning. However, consistency with regional assessments and plans is important. This and the following nine questions all seem to reflect on the tension between national and local forest planning. For a template of how to resolve this tension, we recommend you closely review the Western Governors Association 1999 Policy Resolution *Principles for Environmental Management in the West*. (Business or Association, Washington, DC - #A17887.13110)

#### **223. Public Concern: The Forest Service should tailor the level of decisionmaking to the scope of the issues.**

##### **NATIONAL LEVEL DECISIONMAKING FOR ISSUES OF NATIONAL IMPORTANCE, FOREST LEVEL DECISIONMAKING FOR ISSUES SPECIFIC TO THE FOREST, AND SITE-SPECIFIC DECISIONMAKING FOR PROJECTS WITHIN THE FOREST**

EPA believes that certain undeveloped areas such as inventoried roadless areas and unroaded areas should be evaluated and conserved at several scales. EPA supports the hierarchy of land management decision making principles outlined in the National Forest Management Act (NFMA), i.e., issues of national importance are best resolved at the national level; issues that are primarily of importance only to a specific National Forest are best resolved on a Forest-by-Forest basis; and issues that pertain to a particular project within a single National Forest are best resolved on a local, site-specific basis. (Federal Agency, Washington, DC - #A28843.20201)

The Forest Service must match the public involvement process to the scope of the issues. Where issues of national import, such as the conservation of wild areas such as embodied in roadless areas, are on the table, the public involvement process must be national and open to all citizens. Where the issues are primarily of local concern, such as the availability of firewood, then the public involvement process is best targeted to local interests. (Individual, Corvallis, OR - #A8027.15110)

### *Local (Forest Level) Decisionmaking*

#### **224. Public Concern: The Forest Service should define what and who comprises “local forest planning.”**

##### **BECAUSE VIRTUALLY ALL NATIONAL FORESTS SPAN NUMEROUS COUNTIES, LOCAL JURISDICTIONS, AND IN MANY CASES, STATE BOUNDARIES**

Virtually all national forests span numerous counties, local jurisdictions and in many cases, state boundaries. Considering this, defining what, or who, comprises “local forest planning” is vague at best

and, to be accurate, misleading. The expression “local forest planning” is an arbitrary distinction and an inherently discriminatory one as well. How is “local” defined? Everyone within 50 miles of the forest lands to be managed? Within 100 miles? Within a day’s drive? Or should such a definition be based on forest use? If so whose use gets priority (i.e. logging versus dispersed recreation)? Obviously attempting to weight forest planning towards “local forest planning” is discriminatory at best and subject to legal challenge should management of our public lands be based on such. (Organization, Richland, WA - #A962.13100)

The term “local” in the context of forest planning must be clearly defined. What exactly constitutes local planning when it involves a national forest that extends across county and state boundaries? The ramifications of decisions made at the “local” level do not necessarily remain at the local level. Here in the northwest, past decisions on logging, roadbuilding and grazing in the national forests have had an impact on communities well outside of national forest jurisdictions in terms of their ability to obtain clean water or to pursue commercial or recreational opportunities. Decision on the national forests in the northwest have directly affected the commercial and sport fisheries in areas as far away as northern British Columbia and Alaska. The development by the National Marine Fisheries Service (NMFS) of the 4H rules for the watersheds of the northwest is a testament to what can go wrong with the Forest Service’s version of “local” planning. (Individual, Anchorage, AK - #A20934.13110)

## **225. Public Concern: The Forest Service should make management decisions at the local level.**

I do not want freedoms restricted by the government or any other outside influence. If decisions are going to be made regarding my Local Forest I want them made with the input of the local people and not some Washington Bureaucrat. (Individual, Anaheim, CA - #A337.13110)

### **BECAUSE IT IS NOT THE ROLE OF THE WASHINGTON OFFICE TO MICROMANAGE RESOURCES**

Allow District Rangers and Forest Supervisors to make decisions for the public lands entrusted to them and support their actions that are in line with Gifford Pinchot’s maxim of ‘Greatest good for the greatest number in the long run’. The Forest Service has some of the world’s best natural resource specialists working at the District and Forest staff level. Allow them to use their knowledge, skills, and experience to make decisions on what is best for the land.

The role of the Washington Office should be to set broad policy and management philosophy, not micromanage the resources or look over Ranger’s and Supervisor’s shoulders. On-the-ground decisions should be made by people on the ground.

Trust Forest Service employees. Support local decision making. (Individual, Westwood, CA - #A360.13110)

They should be managed locally. If the local USFS personnel determine that a new road is necessary to protect the forest or create a significant benefit to the community, then why should a national directive that has not taken into consideration such issues be in the way? There is no way that the cumulative effects of this plan have been taken into account for every single area designated. (Permit Holder, Vadito, NM - #A20142.13110)

Other Concerns: The Forest Service must empower local managers and specialists to craft solutions to their unique challenges on individual sites or units. Site-specific or project-level decisions on any scale must not be initiated from the agency’s Regional or Washington Office. (Organization, Twain Harte, CA - #A13434.13110)

The Forest Service must allow local managers to craft solutions to their unique challenges on a site-specific basis. What works on one forest may not work on another. Project level decisions should not be constructed or dictated from the Forest Service Washington Office. Forest planning and regulatory processes should be given back to the professional in the agency. Planning and Regulation should not

become a political popularity vote counting process. (Organization, Lake Isabella, CA - #A20945.13110)

**BECAUSE NATIONAL MANAGEMENT WILL NOT RESULT IN PROTECTION OF THE VALUES PEOPLE REALLY CARE ABOUT**

During the last few years we have seen a steady erosion of the local decision making authority and responsibility. This has resulted in centralizing the decisionmaking authority at the National level. This has impacted the local unit's morale and reduced the local accountability. We feel that it is critical to return to a decentralized decision making process, at least to the National Forest level.

Without a comprehensive and locally based process, including decision making, monitoring and accountability, the future decisions concerning National Forests management will not result in the protection of the values people really care about. We encourage you to reestablish local authority and provide a meaningful process that will allow those that are most affected by resource decisions on public land to be meaningfully involved. (Business or Association, Colville, WA - #A3091.12125)

**TO ENSURE THAT GOVERNMENT ACTIONS DO NOT INTERFERE WITH THE OBJECTIVES OF LOCAL PLANNING EFFORTS**

In many communities adjacent to national forests, the good faith effort of local people to develop plans for the management of natural resources, land use and development zoning are inseparably tied to the uses occurring on Federal lands. Local communities as well as the individuals that make up the community develop long term financial and cultural commitment based on their local plans and authorities. Therefore, the USFS should conduct and coordinate all planning at the local forest level with local planning entities whether State, Local or Tribal to assure that government actions do not interfere with or disrupt the goals, objectives and management actions specified in local planning efforts. (Organization, Murphy, ID - #A18024.15111)

Under the Forest and Rangeland Renewable Resource Planning Act, land use planning on the National Forest was to give major consideration to their impact on plans developed by local governments, including the impact of the Forest Service road network on the local road system (See Senate Report No. 93-686 (1974)). Since the closure, and lack of reconstruction, of Forest Service roads has the potential to affect local government plans and roads systems the specific impacts on the governments prior to adoption of the proposed action. (Elected Official, Douglas County, OR - #A11811.15130)

More local input by the people affected, so local industries are not closed by some rule made in the higher offices of the Forest Service. These people still receive their money no matter what stupid decision they make. A little accountability would go a long way in defusing any disagreements. (Individual, Fallon, NV - #A21953.13110)

**BECAUSE IT IS REQUIRED BY THE NATIONAL FOREST MANAGEMENT ACT**

Maximizing the multiple use aspects of the forest is mentioned numerous times throughout the NFMA, and it is the sole purpose of 16USC532. Local forest planning is the only way in which the mandate of the NFMA can be met adequately. At times this may involve decisions concerning maintaining the integrity of a roadless area, decisions which can only be made locally because each forest has its own unique blend of local interface, history, culture, and the problems associated with those characteristics. (Individual, Denver, CO - #A5433.20201)

The NFMA makes the land and resource management plan (forest plan) the focal point for management of each National Forest. After adoption of the forest plan, 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). If a proposed "resource plan" is not consistent with the forest plan, the NFMA requires analysis of a proposed plan amendment and the opportunity for public comment before the plan amendment can be adopted and implemented. *Id* [Section] 1604(d) and (f)(4). Forest plans are the engines that drive the forest management process.

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. S. Rep. No. 94-893, at 26 (1976). This prohibition against national prescriptions also extends to Forest Service actions:

The Committee bill directs that guidelines be developed by the Secretary of Agriculture for the land management planning process. While planning guidelines will apply at all levels, *there is not to be a national land management prescription*. The general framework for the plans and appropriate management direction would be established on a national basis . . . . The *detailed application of this framework and direction would be reflected in individual plans* . . . . The Committee believes that in the development of land management plans, the land manager must pay particular attention to the identification of land suitability and capability for various types, level, and combinations of resource use . . . and special resource relationships where hazards exist for the various resources [e.g., forest health issues]. S. Rep. No. 94-893, at 35. (emphasis added). (Business or Association, Spokane, WA - #A17351.20201)

Chief Bosworth, it is our contention that: (1) this ‘roadless discussion’ is intrinsically and legally inappropriate because it is intended to override the determinations of existing forest plans which have their legal basis and credibility under the National Forest Management Act. (2) As you brought out in your advance notice of proposed rulemaking the scale of this discussion is infeasible and duplicative of the forest planning process.

It would serve the public’s best interests for the United States Forest Service to lead the public back to the legal framework with which such values/topics can be legally considered, i.e. forest plan revisions. (Business or Association, Cody, WY - #A19163.13110)

#### **BECAUSE DIFFERENT AREAS HAVE DIFFERENT CONDITIONS AND NEEDS**

I feel that local forest plan should be given the biggest role in evaluating management of inventoried roadless areas. Every section of our country, state, county or area has its own “little signature”. How can someone in California tell us in Chester South Carolina how to protect our forest. We seem to do a great job here because we have not had the forest fires that California seems to have. Even a state as close as Florida has problems with fires. These states must have problems that do not exist in SC, or they would be doing a better job. (Individual, No Address - #A57.13110)

The disposition and management of inventoried roadless areas should be determined in forest plans on a unit-by-unit, site-specific basis. These areas and their resources are vital to adjacent communities. A full range of alternatives must be developed for each unit and carefully examined under the NEPA process. Some may be best managed as roadless in perpetuity or recommended for wilderness designation, while others should be developed for commodity production. A myriad of factors must be considered, such as fuel loading, forest health, proximity to private or other public property, size, terrain, soils, watersheds, minerals, wildlife and fisheries. Each unit is unique and needs a tailored prescription. While rules may guide how the determination is to be made in a broad sense, the decisions should be made in the forest plans. (Individual, Lewiston, ID - #A2872.13130)

It is inconceivable that anyone, especially professional foresters, would try to write a single EIS to address all the diversities of the various areas included in the roadless policy. A separate EIS should be written for each area. A committee in one central location cannot possibly cover all concerns and diversities of the many separate areas included in the roadless policy. (Individual, Miami, AZ - #A880.13230)

It is agreed by all that we need to protect our forest and make sure we address forest preserve part of our forest for the animal habitat and water quality. I believe this can be done best on a local level. Each community has their own set of standards or rules that need to be followed. The same applies to other countries. What may work for one may not work for the other? There standards or rules . . . why would

we agree to give someone or a group total power to make decisions for us that affect us but not them without a fight? (Individual, Argonne, WI - #A11688.13100)

Federal policy-making must recognize that not all “inventoried roadless” areas are of equal quality. Much time has passed since the 1979 RARE II inventory, and conditions in many areas once considered roadless—for purposes of the 1979 inventory—have changed. Likewise, we have seen dramatic changes in the public’s use of NFS lands for diverse outdoor recreation. Given these dynamics, the Association believes the local forest planning process is the most appropriate means for making roadless protection decisions. (Permit Holder, Hood River, OR - #A13230.13110)

#### **BECAUSE LOCAL PLANNERS HAVE A BETTER UNDERSTANDING OF LOCAL NEEDS AND CONCERNS REGARDING LAND MANAGEMENT**

I feel strongly that local land-use managers should be able to make the decisions on whether to allow new roads and facilities to be built on public forest service lands. The federal government should have guidelines and rules set for reviewing and making sure that environmental concerns are resolved, but the decisions on how to manage the land should be made locally. Local governments and managers have a much better understanding of the needs, issues, and concerns that are involved with land management. Therefore the decisions should be made by those who are the most informed and knowledgeable with the issues. These decisions should undoubtedly be made by the local authorities and experts. Please don’t let local issues be decided by uninformed bureaucrats in Washington that are only concerned about what their constituents from their states want. Decisions made on land usage have major impacts on the lives and lifestyles of those in the local area. Let the local experts be the ones making the decisions. (Individual, Houston, TX - #A4613.13130)

Local Forest Planning should be paramount in evaluating such areas. We’ve gone through RARE I and RARE II and spent a tremendous amount of money doing so; then we’ve gone through study after study until no one knows where we are anymore. To make a “cookie cutter” plan for the entire National forest system is absurd. Only local planners can truly evaluate roadless areas for what they are, and should be. (Individual, Pendleton, OR - #A666.13110)

The people of the local area should do the evaluating not the FS [Forest Service], their economy should be a leading factor, is their minerals there, is their timber there, what’s the best way to get at it, how about recreation, a camp ground, a park all these things should be looked at before it is environmentally locked up. (Individual, Baker City, OR - #A1038.13230)

Informed Decision Making. The roadless areas are best planned and the management needs identified by the local offices of the Forest Service. A substantial problem with the present rule is that there is no provision for local Forests to make exceptions when it is necessary. Local public input was limited by the way the information was collected and local problems were not identified or considered. The Rule identified the values to be protected were national in scope, but did not consider the impact on local communities nor was local input considered. The information about local impacts resides at the local Forest offices and was not a part of the decision making process. These local offices have the information on impacts and can acquire local input on the important local roadless issues. They should be allowed to do this job. (Business, Viburnum, MO - #A11695.11110)

I value the decisions made on a local forest service level. They know the areas around them and the people who impact and use the land. Comments should be made to them on a local level and not on a wide scale basis. There are many areas that are inaccessible already. One local canyon was recently locked up. Now, we are suffering many consequences: 1) the local sheep ranchers are unable to get groceries and supplies to their herder. It was impossible to take the camp for a three-month stay, so the herder was forced to live in a tent. Therefore, the grazing rights are currently for sale. This threatens the livelihood of the ranchers. 2) The elk have reached an unhealthy population and hunters are not able to take an animal. It would spoil before they could get it out of the mountains. Now the elk are running

down on the highway. Over thirty big bulls, valued at \$6,000 to \$20,000 each has been killed by motorists. The DWR have had to pay extra expenses to hire help and herd them off the highway each night. 3) A local timber company has had to lay off 20 workers. This was a huge impact for our little rural town since we only have three major employers. Satterwhite had the possibility of becoming the fourth, but now we watch as the beetles continue to destroy our forests and we are helpless to watch. The timber companies were responsible for taking all the dead lumber and also improving our canyon roads. Most of the people who enjoy recreating here are from Salt Lake City and surrounding counties. We don't have the tax base necessary to maintain the roads in each canyon. But volunteers, the National Guard and the timber company have taken care of us. No one in Washington DC is able to know and understand any of the issues or their impacts. (Individual, Las Vegas, NV - #A26123.13100)

It is our opinion that the best form of environmental review is the one that is most closely linked to the area in question. Forest planning issues should always be reserved for the local Forest Supervisor/District Ranger review. Only he/she has the history and background necessary in order to completely review a project for all its merits and/or shortcomings. While we understand that Washington based mandates are more easily established and quicker to implement, they are often times negligent in their ability to foresee opportunities or issues that may potentially arise. For this and many more in-depth reasons, we adamantly oppose any Forest Planning decisions made at a level above the Forest Supervisor's Office. (Business, Twin Bridges, CA - #A8808.13100)

#### **BECAUSE DIFFERENT AREAS HAVE DIFFERENT USE DEMANDS**

While all of the national forests are open to the public, it is also true that forests in different areas have different majority of use demands than other forests in other areas.

As an example, while the forests in upper New York state would naturally have a high usage of backpackers and hikers, the national forests in southeast Texas would see almost no backpacking or hiking. While some forests would draw a high percent of boaters and fishermen, other forests would not be represented by those same type of users.

So, it's almost imperative that each national forest be considered on an individual, and local, basis. (Individual, Mesquite, TX - #A28471.13200)

The only appropriate avenue 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 of this proposal is a top-down management decision that forces managers to make decisions based on a national policy that does not reflect local conditions. A perfect example of the need for local decisions is the assertion in the FEIS that "there is currently a trend of decreasing interest by the mineral industry in exploration and development of domestic mineral resources" (p. 3-143). The opposite is true for the largely under-explored Chugach National Forest, yet there is no recognition of this fact in the FEIS or proposal. (Professional Society, Anchorage, AK - #A21707.20201)

#### **BECAUSE A MANAGEMENT CHANGE IN ROADLESS AREAS MAY ADVERSELY AFFECT THE REMAINING AREAS OF THE FOREST**

We question whether changing the management character of the roadless lands outside the context of the forest plan is consistent with the National Forest Management Act, Renewable Resources Planning Act, and the Forest and Rangelands Renewable Resources Planning Act. Since a management change in these areas has the potential to adversely affect the remaining areas of the forest, we suggest that the roadless issue only be addressed in the context of the forest plan. (County Attorney, Grant County, OR - #A17667.20200)

#### **BECAUSE PROFESSIONAL FOREST MANAGERS ARE TRAINED FOR MANY YEARS**

In this political vote-for-your-favorite-forest-use-process, the professional forest manager is being totally ignored. Schooled and trained for many years, these are the people who best know how to manage

forests for multiple uses. Today, over 100 preservationist groups are petitioning to have all motorized traffic banned from the 56 million acres. If that happens, the roadless areas become nothing more than wilderness areas. In wilderness there is no need for management, no need for managers or foresters, no forestry, just lock it up and leave it alone. (Individual, Salem, OR - #A5958.12100)

#### **BECAUSE GREATER WEIGHT SHOULD BE PLACED ON THE GREATER FOREST EXPERIENCE**

A mere counting of “ayes and nays” is not adequate. Perhaps a “stakeholder’s questionnaire” needs to be developed that ascertains how many hours the person has spent in the forest. Is this someone who has spent a lifetime in the forest, through all sorts of public policy fluctuations, or is this a person who spend two weeks in July camping? All opinions definitely need to be heard, but in the final analysis the greater weight needs to be placed on the greater forest experience. (Individual, Emmett, ID - #A110.15110)

#### **BECAUSE LOCAL RESIDENTS HAVE THE MOST KNOWLEDGE ABOUT THE RESOURCES AND THE MOST TO LOSE IF A BAD DECISION IS MADE**

[Rural people] largely understand the relationships between resources and our national quality of life because they grow cattle, farm the crops, harvest the trees and mine the minerals. They are also the people who rely on our national forests for jobs, raw materials and the fun things in their lives. They love undeveloped wild lands and wilderness. However, they also value the variety of recreation opportunities the national forests are capable of supporting, motorized and non-motorized. They understand that our nation needs the valuable products that can be produced from our national forests, such as wood, forage, minerals and water. They understand the importance of an adequate infrastructure to provide access to these forest land-roads, bridges, and trails. Effects of proposals such as this are immediate and devastating to the people who live close to and depend upon the national forests. Please keep in mind this urban vs. rural conundrum when evaluating input. Consider who has the most knowledge about the resources and the most to lose if a bad decision is made. Don’t deepen the divide. (Business or Association, Olympia, WA - #A3619.15100)

#### **BECAUSE LOCAL RESIDENTS KNOW HOW THEIR FORESTS HAVE BEEN USED THROUGH TIME**

The Forest Service is notoriously ahistorical—old cabins with years of history are burnt down without notice, old mine shafts are plowed under and destroyed, seemingly without a thought for the lost human legacy. Managing a natural landscape does not mean ignoring historic use. Local inhabitants know how their forests have been used through time, and their input should weigh heavily for any road closures and new limits on currently roaded areas. (Individual, West Yellowstone, MT - #A1045.15111)

#### **BECAUSE ROADLESS AREAS ARE VITAL TO ADJACENT COMMUNITIES**

The disposition and management of inventoried roadless areas should be determined in forest plans on a unit-by-unit, site-specific basis. These areas and their resources are vital to adjacent communities. A full range of alternatives must be developed for each unit and carefully examined under the NEPA process. Some may be best managed as roadless during the life of the forest plan or recommended for wilderness designation, while others should be developed for commodity production. A myriad of factors must be considered, such as fuel loading, forest health, proximity to private or other public property, size, terrain, soils, watersheds, minerals, wildlife and fisheries. Each unit is unique and needs a tailored prescription. While rules may guide how the determination is to be made in a broad sense, the decision should be made in the forest plans. Whatever the case, it is absolutely necessary that the forest plans be completed in a timely manner. (Business, Lewiston, ID - #A7991.13110)

The Forest Service should work with the local communities that are directly affected by any decisions concerning these wild lands overseen by tribes or state directly affected. Any organizations or individuals who claims to be “acting in the interests of the wilderness areas” are just that . . . acting! There is no way to put this much land back to 100 years ago”, nor should we. Our very lives depend on these watersheds, minerals and wood products. (Individual, Three Forks, MT - #A697.15100)

Local values should be of utmost consideration. Too many times have national decisions been made that have been very damaging to local economies and local lifestyles based solely on the desires of very vocal groups who seldom are directly impacted by those decisions. I know of no one who wants to

destroy or damage our local forest for the very fact that our lifestyles would suffer the most if we were to lose our access privilege either through loss of quality of forests or through regulations based on foreign decision making. Rural Utah does not have the population required to sway federal decision makers so making decisions based on political or nationally popular agendas is unfair and not necessarily best for the forests. (Individual, Richfield, UT - #A27881.13100)

**BECAUSE NATIONAL PLANNING DOES NOT ALLOW AN ADEQUATE TIMEFRAME TO CONSIDER IMPACTS ON INDIVIDUAL ROADLESS AREAS**

It is hard to fathom how a national policy could adequately evaluate all impacts to roadless areas within the eighteen months it took to develop and finalize the policy. Single National Forest planning, and even single project planning by the Forest Service, can take anywhere between one to five years to complete with a minimal average of least two years. These simple facts raise serious doubt as to the appropriate and adequately deliberated consideration of roadless policy impacts. An agency policy that affects all roadless areas through one national decision cannot address the unique forest conditions of each individual Forest or roadless area. Due to the time consuming nature of NEPA processes, and the lack of detailed roadless area information, there is much cause to support roadless area consideration through the normal National Forest Management Act (NFMA) authorized National Forest System planning process. (Professional Society, No Address - #A29920.10134)

**BECAUSE LOCAL PLANNERS ARE BEST ABLE TO DEAL WITH PROBLEMS IN A TIMELY MANNER**

I feel local situations require local decisions. Not only forest fires but insect infestations, watershed, and plant life trends need to be dealt with locally so those with the most information about a problem are able to design a program that best fills the needs in a timely manner. Too often invasive plants, insects, watershed problems and such have done so much damage by the time any local effort is allowed to be put into action. (Individual, Richfield, UT - #A27881.13110)

**IN SPITE OF THE THREAT OF LITIGATION FROM WILDERNESS ADVOCACY GROUPS**

Site specific and project level decisions should not come from the Washington D.C. office. The decisions should remain at the local level with input from the communities. We would like more advanced notice of public meetings. More public announcements of such meetings with lengthier comment periods in order to properly address issues of public concern. We urge you not to be influenced by the threat of litigation from Wilderness Advocacy Groups. We wholeheartedly support multiple use management for our public lands. (Organization, Bullhead City, AZ - #A12066.12100)

**226. Public Concern: The Forest Service should consider that localizing decisionmaking requires that current law be revised.**

Localizing decision authority is impossible, and will remain so, until NEPA, NFMA, and a pile of other Seventies-vintage laws are reformed. (Individual, Whitefish, MT - #A20672.20200)

**227. Public Concern: The Forest Service should allow local decisionmaking only if an easily accessible appeals process is in place.**

Local planning is too easily swayed by local issues and often fails to see the "big picture" that is more easily addressed on a national and international level. While local input is useful and should not be disallowed, the entire decision should not be left at a local level unless there are available and easily accessible appeal processes that can be accessed by any concerned person. (Individual, No Address - #A27088.10130)

**228. Public Concern: The Forest Service should develop regional guidance for implementing the Roadless Area Conservation Rule.**

The Douglas Indian Association, a Federally recognized tribe, respectfully requested that the USDA Forest Service revert back to regionalized planning in each of the national forests in the United States. The Roadless Policy placed on all the national forests last year minimized the benefits of the regionalized approach to land planning. The local management concerns are largely ignored with blanket policies such as the Roadless Policy. (Tribal Association, No Address - #A23324.12311)

**WHICH RECOGNIZES THE DIFFERENT CONDITIONS AND MANAGEMENT NEEDS OF FORESTS IN DIFFERENT AREAS OF THE COUNTRY**

Ecological needs and human values differ, for example, between eastern and western forests and the people who use them. The Wildlife Management Institute would support a provision in the modified Rule that authorizes the development of regional guidance to aid in implementation of the roadless Rule by allowing the consideration of factors that could vary geographically such as forest size, vegetation types, watershed configuration, and proximity of human populations. We believe these types of exceptions would address the principal concerns raised by stakeholders. If coupled with the establishment of categories of roadless areas for which exceptions would not apply . . . this limited expansion of the Rule's exceptions could furnish the basis for seeking consensus on a modified Rule. (Organization, Washington, DC - #A21762.45340)

Wisconsin forests and Wisconsin forest policy debates are different from western forests and western political issues. The roadless rule does not recognize this distinction, but should. (Professional Society, Eagle River, WI - #A19071.45600)

As you work toward a reasonable approach to this problem, remember that the one-size-fits-all theory that is so often used by government agencies is not appropriate in this case. The south is different from the Pacific Northwest, Lakes states and other sections of the country. It should be treated as such. (Business, No Address - #A17224.45341)

**229. Public Concern: The Forest Service should allow local districts to manage forests under a sustainable yield harvest plan.****TO ENABLE DISTRICTS TO BE ECONOMICALLY SELF-SUFFICIENT**

I say let each local district manage their forests on a sustainable yield harvest plan—trees in Colorado grow at a different rate than trees in Montana—trees around Seeley Lake grow at a different rate than trees by Philipsburg. Multiple-use is good and it fits well but again let each local district make their decisions. Each district needs to be self-supporting economically and decisions of their resources need to be made based on that. Example all the jobs in that district need to be supported by the resources of that district. (Individual, Seeley Lake, MT - #A5437.13110)

**230. Public Concern: The Forest Service should allow individual national forests to opt out of the Roadless Area Conservation Rule.**

I strongly support changes to the Roadless Area Conservation Rule. I particularly support allowing individual national forests to opt out of the rule and decide to go back to logging, building roads in, or otherwise developing these areas, including all those in Alaska's Tongass forest. (Individual, Marthasville, MO - #A6704.10130)

**OR TO MAKE LOCAL EXCEPTIONS TO THE RULE'S PROHIBITIONS**

I am in favor of allowing flexibility in the ruling to allow individual communities through local councils the ability to recommend areas that are practical for road building given circumstances unique to that community. For example, if the Ketchikan Assembly feels that areas within their jurisdiction are sensible for development, then there should be allowance in the law for that to happen, such as potential development on Gravina Island. There should be reasonable concession for recreation, mining and timber activities to continue. (Individual, Juneau, AK - #A23200.15111)

The FRWG supports opportunities for local input to the Rule in two basic ways. First, citizens living near the inventoried areas should have the opportunity, individually or through their organizations, to persuade the Service, in this review, that clearly defined and limited exceptions to the prohibitions, specifically designed to enhance the ecological values of roadless areas, should be made a part of the Rule, e.g. that geographic differences justify greater flexibility to address unique characteristics. Second, local input is important, and already provided for in the Rule, with respect to proposing and justifying

exemptions for specific activities in specific places. What should not be allowed, and cannot be justified if the Service is to keep its pledge, is the wholesale granting of discretion to adopt local proposals for road building or timber harvesting in the inventoried areas for whatever reason that may be put forward, such as, for vague and ill-defined forest health reasons. (Organization, Washington, DC - #A23283.15111)

**231. Public Concern: The Forest Service should not allow individual forests to opt out of the Roadless Area Conservation Rule.**

Local forests should implement and augment national policy protecting roadless areas (the Roadless Area Conservation Rule). They should NOT be allowed the option to ignore the Rule and develop their roadless areas. Instead, they should work to identify roadless areas that were omitted from inventories used to create the Roadless Area Conservation Rule, protect those newly identified roadless areas in the same manner as inventoried roadless areas (as Wilderness Study Areas are protected in the same manner as Wilderness), and submit them to the Forest Service national office for addition to the national inventory. (Organization, Escalante, UT - #A27872.13200)

**232. Public Concern: The Forest Service should recognize that “local expertise” may or may not be superior to professional Forest Service expertise.**

**DEPENDING ON THE MOTIVATION**

The notion that “local expertise” is superior to professional Forest Service expertise is both true and false, depending on the expert to whom you are listening. For the most part, in recent years, that notion has been promoted, not so much by local residents as by those who have invested in local land for mining, timber, recreation and/or grazing. I am well acquainted with a successful Colorado rancher who has been recognized by the USFS as a model steward of leased grazing land, and who is a supporter of roadless areas. Good business and conservation are not necessarily at odds, but greed and conservation are. “Local experts,” like my rancher friend, can indeed be more knowledgeable than well-educated government scientists familiar with a different part of the country, but they are often experts in only their own self-interest, not in the long-term best interests of the country. (Individual, Fort Collins, CO - #A12852.13110)

**233. Public Concern: The Forest Service should clarify how local expertise will provide more reliable information than was gathered for the Roadless Area Conservation Rule.**

The USDA apparently believes that the only true basis for decision is based on local input. The May 10, 2001 press release states that the USDA will examine “more reliable” information and accurate mapping, including drawing on local expertise and experience through the local forest planning process.” It is unclear how local expertise and experience will provide more reliable information than that gathered in the extensive review leading to the January 12th rule. The USDA should certainly be responsive to local input and information, but not to a greater extent than any other interested party. Local input is not the only source of reliable information. (Individual, Chico, CA - #A17483.15112)

*Local (Forest Level) Decisionmaking with National Guidance*

**234. Public Concern: The Forest Service should ensure that local forest planning adheres to the Roadless Area Conservation Rule.**

If you are asking what the job of the local Forest Service administrator is, it should be to manage the local forest as the public wishes, which the public has expressed previously concerning the roadless initiative. So, local forest planners should follow the national policy. (Individual, Macomb, IL - #A95.13130)

The current rule does not allow decisions to be made at the local level through the forest planning process under a set of national criteria.

The Secretary of Agriculture must establish national standards to guide roadless area conservation. The new rule should require Forest Service line officers to apply those standards through the forest planning process.

Further, the new rule should require Forest Service line officers to make decisions about roadless at the local level with adequate state and public involvement processes.

The new rule should eliminate the national application of the current rule.

I am in support of roadless area conservation of these roadless areas that meet the national standards based on the information available by area. (Individual, McMinnville, OR - #A818.13130)

Inventoried roadless area prohibitions must be codified in Forest Plan revisions and amendments but, for consistency, they must be decided Nationally for all roadless areas. This direction must apply to all National Forest roadless areas that exist. The local Forest manager should not be free to choose what may or may not take place on a roadless area. They must be involved in deciding how to best implement National direction.

This should be true even if that means rejecting an alternative project that is proponent driven, or a project that is strongly supported locally. (Individual, Grangeville, ID - #A830.13130)

These areas should clearly not be subject to local control, as this is clearly an issue that must have participation of the entire nation. Simply because land exists in a certain state or locality does not mean it is theirs to control in any way they wish, to possibly sacrifice long-term planning for short-term jobs. The Roadless Area Conservation Rule is required and protection of these areas must be secured into the future. Local areas can be involved in securing these areas and in making sure other suitable regions are likewise identified and protected. (Individual, Lexington, KY - #A1077.13130)

The role of local forest planning is to protect and manage inventoried roadless areas in accordance with RACR. These are National Forests, not local forests. (Individual, Livingston, MT - #A8306.13130)

Forest plans as they come up for renewal should be brought into alignment with the decision to protect remaining roadless areas. (Individual, Santa Fe, NM - #A11703.13130)

#### **BY NOT ALLOWING LOCAL FOREST PLANNING TO MAKE EXCEPTIONS TO THE ROADLESS AREA CONSERVATION RULE**

The Rule expressly allows for exceptions to the prohibitions, such as to protect public health and safety. Allowing forest plans to make additional exceptions for specific activities would completely undermine the Rule, setting the stage for a return to the incremental destruction of roadless areas that the Rule intended to stop. Roadless areas should receive additional protection through the forest planning process, especially from destructive off-road vehicles and mining. (Individual, Fresno, CA - #A1593.13100)

The regulations need to be more specific and to leave less decision making to the discretion of local responsible officials. They need more specific guidance in implementing the roadless area regulations. The vagueness of parts of the regulations make them subject to challenge in the courts. It is an important subject and the regulations are too brief, lacking in clarity and too open to interpretation by local "responsible officials." (Organization, Fullerton, CA - #A3705.13100)

#### **BY MAINTAINING A HIGH THRESHOLD FOR GRANTING EXCEPTIONS**

Procedures for granting exceptions based on local input should include public comment and place a high threshold to be crossed for granting exceptions. (Individual, Denton, TX - #A156.14410)

**235. Public Concern: The Forest Service should evaluate local decisions regarding inventoried roadless areas within the context of the Roadless Area Conservation Rule.**

**WITH REGULAR AND ON-GOING NATURAL RESOURCE INVENTORIES AND ASSESSMENTS**

The national public desires roadless areas to be continued in their unroaded condition. This question has been decided overwhelmingly. Within the RACR there is substantial flexibility and there are many local issues to be resolved within the framework of that flexibility. Many in the environmental community strongly argued that the RACR was too open ended in many regards, and these very issues now face local forests for planning and resolution. How the local forests make these decisions and implement plans may preclude additional issues from reaching the same level of national concern (e.g. off-road vehicle use and other activities . . . ).

As the Forest Service evaluates local decisions regarding inventoried roadless areas within the context of the Roadless Area Conservation Rule (and other national policy guidance), this evaluation needs to be done in the context of regular, on-going natural resource inventories and assessments, and at the time when decisions are to be proposed which may affect roadless areas covered by the Roadless Area Conservation Rule. Any evaluation prior to such decisionmaking process seems to be academic and a waste of time. (Individual, Corvallis, OR - #A15303.13130)

**236. Public Concern: The Forest Service should establish general guidelines for the consideration of roadless areas.**

Give local forest managers guidelines (like installing roads along contour lines and far away from streams) but allow them the responsibility to make decisions regarding management of local forests, inventoried or not. State Forestry agencies manage on a local level very well. (Individual, Princeton, WV - #A18086.13110)

Allow local forest planning to apply broad National standards in managing the roadless areas. Consultation with Wisconsin's citizens and resource professionals, not a directive from Washington D.C., should be at the forefront of such change. (State Agency, Madison, WI - #A28775.13110)

**WHILE ALLOWING EXCEPTIONS AS APPROVED BY THE SECRETARY OF AGRICULTURE**

A national rule should provide the overarching criteria for the preservation of inventoried unroaded areas and specify the exceptions. The designation of reconsidered or new candidate roadless areas should be screened to select those inventoried areas that are ecologically important. Examples of ecologically important areas would include those that are: critical to water quality; provide endangered species protection; include ecosystem values; and where there is public support to remain roadless and opportunities exist to minimize potential use conflicts. Any construction of new roads or improvement of existing ones in areas designated as roadless should be based on specific exception criteria set forth in a national rule. In cases where important national priorities need to be addressed, a mechanism should be developed to enable the Secretary to authorize an exception to a national rule. (Federal Agency, Washington, DC - #A28843.50000)

**WHILE ALLOWING FOREST SUPERVISORS TO NOMINATE AREAS SUITABLE FOR DESIGNATION**

The key question is. How many million of acres must be designated for such purposes, thereby essentially excluding all other uses and users? I believe this is suitably answered by allowing Supervisors of individual forests to nominate those portions most suitable for such designation following very specific scientific, economic and common sense criteria and guidelines that are applicable to all of our National Forests. Such criteria and guidelines must consider factors such as: The presence and abundance of sensitive species and amount and types of suitable available habitat present; the amount and type of commercial timber present and the economic and environmental costs and benefits associated with the harvesting and removal of the mature timber, accessibility of the areas to the public via existing roadways and trails and current and projected rates of use by the public (including ranchers holding grazing permits), the societal impact that closure of these areas to vehicular traffic would have on members of the public engaged in camping, bird watching, wildlife viewing, hunting, fishing, hiking,

trapping, collecting firewood, cutting Christmas trees, logging, livestock, grazing, and other economical and recreational pursuits. (Individual, Cedar City, UT - #A20426.12125)

#### **WHILE ALLOWING FOREST PLANS TO ALLOCATE LANDS**

The regulations should be general, short and simple, providing direction to guide consideration of roadless units in the forest plans. They should not make any blanket, nationwide set-asides of roadless lands. Allocation of these lands should be done in the forest plans. (Organization, No Address - #A8227.15100)

#### **WHILE ALLOWING FOREST PLANS TO ADDRESS SPECIFIC FOREST ACTIVITIES THAT ARE BOTH FEASIBLE AND SUSTAINABLE**

Agency goals for US Forest Service system ecosystem management should be broadly set at the top levels and should serve as an umbrella of guidelines for regional and local forest units to work within.

Within the overall guidelines for the agency, variations at the regional and/or individual forest levels should be allowed to address specific forest activities that are both feasible and sustainable. (Individual, No Address - #A29334.13130)

#### **WHILE ALLOWING FOREST PLANS TO DETERMINE THE RELATIVE MERITS OF THEIR ROADLESS AREAS AND NEED FOR ROADS**

The role of the National office of the Forest Service should be to provide direction or guidelines to help the forest or regions determine the relative merits of their roadless areas. This guidance shouldn't be a strict, by the numbers direction, but more general such as, amount of critical wildlife habitat, presence/how much spectacular scenery, relative regional abundance of undisturbed areas, how much local demand there is for roadless vs. roaded recreation, etc. A decision needs to also be made on whether an area is best managed with roads or without. Some areas in the West have tremendous accumulations of fuels that cannot be efficiently dealt with without building roads. Many of these values can be protected without declaring an area totally hands off. (Individual, Wrangell, AK - #A30478.13130)

### **237. Public Concern: The Forest Service should use local knowledge to enhance national planning.**

Local planning is essential, but should not outweigh federal planning efforts. Local planning is subject to too much manipulation by one or two powerful interests—for example, a large lumber company or mining outfit that employs a lot of people in a small town can corrupt the process. (Not that the USFS doesn't have the same problem, but at least there's some semblance of national oversight.) Federal planning should be in concert with local efforts. No one should need to reinvent the wheel to get something done—use local knowledge to enhance federal efforts. Use the people already on the ground, who have built up relationships with local people, and give them a clear cut set of criteria that they can defend, and send them out to do inventories. Make sure they understand that what they are doing is critically important, and that their work will not be overlooked or used against them down the road. Ensure there are systems in place to check for data anomalies, etc. (Individual, No Address - #A29275.13130)

## *National Decisionmaking*

### **238. Public Concern: The Forest Service should make management decisions at the national level.**

#### **BECAUSE NATIONAL FORESTS ARE NATIONAL RESOURCES**

The local role should be highly limited in decisions about which areas should be subject to which conservation measures. National forests are national resources, so decisions about them should be made in the national interest. The interests of local players should receive a weight proportional to their membership in the national polity. Because local players often have more intimate knowledge about the national forests in their areas, they should be given a platform to voice their opinions and observations,

but not as deciding voice in matters that are of importance to all Americans whether or not they are in a position to live near a national forest. (Individual, New Haven, CT - #A616.13120)

I believe that national forests are national assets, and should be safeguarded as repositories of both tangible and intangible riches. It is the role of the government to examine the role of the whole national forest in the whole country, and to recognize and protect these designated national treasures for the long-term good of our country. It may be that local areas appreciate the importance of preserving local forests, or it may be that they do not. Because the latter situation will necessarily occur in some places, federal government must stand behind its name of “national” forest. (Individual, Fairfield, VA - #A15817.13130)

Roadless areas are part of our National Forest System and are a national resource that should be regulated by national policy. The administration does not contend that water quality should be governed by local opinion, or that nuclear safety and nuclear waste concerns should be governed by local opinion, or that drilling for oil, or that location of gas pipelines and energy transmission lines should be subject to veto by local citizens. In all of those areas the administration asserts that national environmental policies are essential. We believe that roadless areas are an important national resource and should likewise be governed by a national policy. (Organization, Seattle, WA - #A21702.13120)

The role of the local forest managers in the planning and administration of protection and management of our national forests should be limited to enforcement of a national policy only. National forests are a public trust that belong to all Americans and are not suited to be managed according to the whims and limited perspective of a local manager. A national policy dictating the protection of all remaining national forests should govern all local managers administration with no allowance for interpretation.

National forests are for the use of all people and are not to fall under the dominion a local community. (Individual, Vallejo, CA - #A27573.13120)

The attempt to gain more “local control and input” into the management of public lands under national management fails to consider that nationally managed public lands be managed in the national interests. We have already seen an explosion of influence buying and selling in Congress, and that same buying and selling of the public’s interests for private gain is also carried out at the local level, only at a reduced cost. Under this divide and conquer practice, local individuals can be pressured into, or influenced into accepting, incursions into the roadless area, ignoring existing protection and the reasons they have been put into place. I believe that since these public lands belong to all of the people, not just locals, management of the national forests should reflect this position. (Individual, Lewiston, CA - #A28731.13120)

Local input should be taken into account making management decisions; the degree to which local interests hold sway is the issue. Often local interests are at odds with the interests of the nation as a whole in preserving roadless areas in an undisturbed state. We would never stand for letting local citizens harvest timber in Yellowstone National Park, though some citizens of neighboring communities might want to, because we want to preserve the splendor of a national treasure. The same reasoning should apply to most roadless areas—they are also national treasures. (Individual, Bozeman, MT - #A20412.13120)

#### **BECAUSE DECISIONS MUST BE IN THE BEST INTEREST OF THE WHOLE COUNTRY**

Local forest planning must be given important consideration in evaluating protection and management of roadless areas of course. But remember that the forests belong to all of us including future generations. Any decisions must be truly national decisions that are in the best interest of the whole country. Remember that local folks, although they usually know the territory best, often have short-sighted goals. And local USFS personnel are often influenced too strongly by the local people with whom they live and work. (Individual, Boulder, CO - #A5250.13000)

Roadless areas have great national, regional, and local value as important watershed headwater areas, for rapidly growing outdoor recreation, and for wildlife, including, endangered species, habitat. The local planning process has failed to protect these values as local planners have routinely and narrow-mindedly given in to local timber, mining and ranching interests, often foolishly ignoring the economic value of recreational uses and clean, pure water. For example, the Southern Appalachian national forests have lost countless roadless areas to timbering and misguided road construction in the last few decades, even after study after study showed that the economic value of these lands for outdoor recreation far exceeded the timber values. I have no confidence in the failed local planning process. National forests belong to all Americans, not just local timber companies, mining companies, and ranching interests. Local interests should have input that is fully and fairly considered, and I believe that local interests should be met where reasonable. However, decision makers should consider the views of all Americans in managing the lands that those Americans own. (Individual, Conyers, GA - #A13536.13100)

Local forest planning and management has been the rule for the last hundred-plus years. The result has been the steady loss of wilderness and a network of forest service roads that exceeds the entire US interstate highway system in length and is impossible for the Forest Service to maintain. The local planning process is generally dominated by interests that stand to make personal financial gain through exploitation of a resource that belongs to ALL the citizens of the country. The remaining roadless areas are a national treasure and can only be protected by a consistent national policy. (Individual, Roseville, CA - #A10567.13120)

Local Forest Service representatives should be responsible for gathering information and submitting it to the offices in Washington, D.C. Their expertise is valuable towards understanding the specific attributes of individual federal forests. However, to allow these same local representatives to set policy is a mistake. This would have the effect of setting too many separate rules and guidelines across the country. While some people might find this appealing, it is flawed. These are federal lands. As such they should be managed by a broad set of rules across the board. Someone from Iowa who travels to Montana on vacation should not have to gaze upon clear-cut forests because local officials decided that they wanted to increase timber harvests. This visitor should have the comfort of knowing that when he travels to another state that the protection and management of forests is being macro-managed back in Washington D.C.

There exists an array of state, county and city land, which is managed and controlled at the local level as well as private lands. Our federal lands belong to everyone and must be managed as such. (Individual, Bozeman, MT - #A21355.13100)

#### **BECAUSE A UNIFORM POLICY IS NEEDED**

Regarding the role of local forest planning, it must be remembered that one of the primary reasons why the roadless rule is needed so badly has been the failure of the local forest planning process. While it is important that the local foresters, who are supposed to be intimately familiar with their forest, to play a key role in evaluating options for the protection and management of roadless areas, the process for doing so needs to be standardized at a national level. Policies should be uniform, not localized. These lands are Federal lands, not State or local lands, and as a U.S. citizen I want to be assured that the maximum level of protection is afforded to roadless lands across the country. (Individual, Renton, WA - #A22439.13120)

There is a need to provide a strategic view of roadless areas nationwide to avoid a patchwork approach to the management of our National Forest resources and to ensure adequate protections for these lands. The Roadless Area Conservation Rule addresses this strategic approach. As provided by the rule, local forest planning should provide additional protection to prevent damage to roadless areas and ensure that the roadless inventories are complete.

The record shows that local forest planning is not adequately protecting roadless area and going forward, current forest plans make about 60 percent (34.4 million acres) available for road construction, logging and commodity development. The Roadless Area Conservation Rule prevents this loss. (Business, Sumner, WA - #A21731.13110)

**BECAUSE THE FRAGMENTATION CREATED BY ROADS TRANSCENDS LOCAL AND REGIONAL MANAGEMENT**

The problems associated with fragmentation by roads are too complex to rely on decisions made at the Forest or Regional levels. Many species that depend on National Forest such as grizzly bears, wolves, and Canada lynx must be managed over very large scales. For this reason, fragmentation of our National Forests by roads is a problem that transcends management at the local or even regional level, particularly near the border of two Forest Service Regions. It is essential that Roadless Areas be protected by a uniform, national rule. (Individual, Evergreen, CO - #A20492.13120)

**BECAUSE FEDERAL DOLLARS SUPPORT THE FOREST SERVICE AND THE LANDS IT ADMINISTERS**

As long as federal dollars support the Forest Service and the lands [it] administers, these lands should be subject to protection and regulation on the federal level. (Individual, Reno, NV - #A20755.13120)

**BECAUSE LOCAL INTERESTS MAY BE TIED TO THE PROFIT MOTIVE OF LOCAL INTERESTS AND NOT REPRESENT THE COLLECTIVE WILL OF THE STATE OR THE NATION**

Local planning should be considered but not be given too much weight if there is a conflict-of-interest. For example, local interest may be tied to the profit motive of local business interests and not represent the collective will of the state or the nation. (Individual, Gaithersburg, MD - #A5191.13000)

The Forest Service has long been a servant of local interests. District Rangers, in an effort to endear the communities in which they live, often place local logging over the good of the forest as a whole. These are NATIONAL forests, not local forests! The Forest Service has lost sight of that fact. The National Forests were created in the early 1900s in response to the abuse of logging of the private sector. We now need to set aside Roadless Areas in response to the abuses of logging within the National Forests. (Individual, Olympia, WA - #A614.13120)

Local USFS supervisors and planners should never be allowed to determine roadless area objectives, goals and prohibited activities on a given forest. Local planners should not decide what to do with roadless areas. They should decide how to best implement National roadless policy and direction. If left up to local managers to decide how the roadless areas should be managed, a myriad of personal commodity extraction favoring values (for those who have them) will enter the picture. If this is allowed to happen, some roadless areas will be roaded/clearcut and others will be preserved. (Individual, Grangeville, ID - #A830.13120)

I firmly believe that our national forests are just that. They are national lands that should be governed by national policy. States already have separate resources that fall under the direct control of state agencies. In my state of Washington, the Department of Natural Resources is currently looking into logging of old-growth forests in these areas to provide state funds in direct threat to endangered species. I firmly believe that increasing local influence on roadless areas conservation will lead to a slow but certain destruction of these areas. Local influence almost always means that there are specific extraction advocates that stand to make substantial financial gains from reduced protection. These interests are thus willing to place significant money behind their lobbying efforts. It is more difficult for the many varied interests of the citizens to organize against such focused moneyed interests, and it is an undue and unrealistic burden to expect the citizens to marshal forces against each and every individual threat. Let us citizens feel safe that these roadless areas will remain preserved as is, without having to continually watch over our shoulders for the next assault by "well meaning, local" interests driven by profit. (Individual, Seattle, WA - #A21682.13120)

**BECAUSE THE FOREST PLANNING PROCESS HAS FAILED TO ADEQUATELY PROTECT ROADLESS AREAS**

The ANPR never mentions that the Rule was developed with the most extensive public participation ever in a federal rulemaking. Instead, it just cites allegations in lawsuits that "there was inadequate opportunity for public review and comment on the roadless rule." Thus, the administration seems to ignore the 1.6 million public comments in support of roadless area protection.

The administration seeks to undermine the legitimacy of the environmental impact statement (EIS) for the rule. The ANPR states that “it is difficult, and perhaps infeasible to collect in a short timeframe, on a national scale, the local data needed to produce a sufficient EIS that analyzes all relevant information or that proposes an adequate range of alternatives.”

The ANPR implies that local decision-making is needed because protection is warranted for some roadless areas but not others. It states that most roadless areas previously were not recommended for wilderness designation due to low wilderness values, inadequate public support, or “other resource potentials.” It observes that the resource values of roadless areas “vary in importance”, specifically pointing out that roadless areas contain 9 million acres of “productive timberland.”

The administration extols the local forest planning as a highly collaborative process involving local, regional, and national interest, using the best available forest-level information and maps. It does not point out the past failure of the forest planning process to protect roadless areas, allowing roads to be built in most of the remaining roadless land. Nor does the administration mention that it is in the midst of amending the forest planning regulations to greatly weaken environmental safeguards and public participation opportunities in the planning process. (Organization, Pinckville, TN - #A5167.12200)

The National Forest planning process has clearly failed to provide adequate protection of roadless areas, and most certainly will continue to be the case in the future, especially given that the Administration is also weakening forest planning regulations. In existing national forest plans, about 60 percent of remaining roadless areas are open to road construction and logging. Continued incremental loss of roadless areas will continue without the Roadless Areas Conservation Rule. (Individual, Hewlett, NY - #A4748.10111)

The Forest Service’s legacy, unfortunately, is not a pretty one. Decades of mismanagement have led to the fragmentation of forest ecosystems, liquidation of old growth forests, and the demise of many fish and wildlife species. In the Pacific Northwest, for example, less than 10 percent of old growth/late successional forests remain and species such as the northern spotted owl, salmon, and marbled murrelet teeter on the brink of extinction. The Sierra Nevada, christened the Range of Light, by John Muir, is unraveling after over a century of logging, mining, and ranching. Species in the Sierra, including the California spotted owl, wolverine, Pacific fisher, American pine marten, and northern goshawk are quickly disappearing. In the southwest, cows have driven out native species, degraded riparian areas, and eroded soils. Off road vehicles run roughshod over public lands across the country. Forests in the mid-west, northeast, and southeast have been so heavily fragmented that few contiguous, large roadless areas exist. And oil, gas, and mining projects, as well as ski resorts, in the northern Rockies have severely compromised the biological integrity of the region. All of these developments were made possible under the forest planning process. (Organization, Nevada City, CA - #A4941.10111)

The Administration appears bent on ignoring the fact that 1.6 million comments were submitted the FIRST time around. A hearty ninety-five percent of these comments SUPPORTED the Roadless Plan and some advocated even stronger protections. Moreover, to propose now that all decisions are made on a local basis is a giant step backwards. History demonstrates that local decision-making hasn’t worked to protect roadless areas for a long time. Therefore, a national policy designed to protect our nation’s roadless lands is imperative. (Individual, Durham, NC - #A934.10111)

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midwest, northeast, and southeast have been so heavily fragmented that few contiguous, large roadless areas exist. And oil, gas, and mining projects, as well as ski resorts, in the northern Rockies have severely compromised the biological integrity of the region. All of these developments were made possible under the forest planning process. (Individual, Boise, ID - #A20396.10111)

I do not want to see Congress and our federal officials make any changes to the current Forest Service's Roadless Area Conservation Rule.

We spent a lot of time (and tax dollars) carefully gathering public opinion to promulgate this rule in the first place. Our country clearly wanted the remaining 30% of our wild national forests protected from human intervention into forest ecosystems through mining, drilling and logging operations. The present Conservation Rule nicely addresses access and local input. The proposal to address each forest area individually will NOT maintain these critical protections. (Individual, Northville, MI - #A179.10111)

The Roadless Rule is needed because local forest planning has failed to protect significant roadless areas in the past. For example, the HD Mountains inventoried roadless area includes over 30,000 acres of lower elevation old-growth ponderosa-pine forests and pinyon-juniper woodlands. Ignacio Creek in the heart of the roadless area is one of the most pristine lower-elevation riparian systems in the Rockies. This ungrazed, unlogged, unroaded watershed is a proposed Research Natural area. Despite the superlative values of the HD Mountains, the existing forest plan adopted in the early 1980s left the area open to oil and gas exploration and development. Consequently, most of the area was leased in the 1980s and 1990s without consideration of the impacts that cutting roads through this pristine landscape will have on a rare, unroaded, lower-elevation ecosystem. Forest Planning utterly failed to protect the HD Mountains which is why the Roadless Rule is needed now. (Individual, Durango, CO - #A11655.10111)

#### **BECAUSE LOCAL PLANNING HAS RESULTED IN AN \$8.5 BILLION ROAD MAINTENANCE BACKLOG**

Forest-by-forest decisions have resulted in nearly 400,000 miles of roads and an \$8.5 billion road maintenance backlog in our National Forests, all borne by the taxpayer. Indeed short-sighted local decisions on forest management are what created the need for the RACR. (Individual, Minneapolis, MN - #A10523.17240)

#### **BECAUSE REGIONAL OR NATIONAL PERSONNEL HAVE BETTER ACCESS TO QUALIFIED SCIENTIFIC OPINION**

Local decisions will be influenced by politics and personal agendas and do not incorporate the large picture. Regional or national FS personnel are more immune to local politics and have better access to qualified scientific opinion. (Individual, Hamilton, MT - #A26764.13000)

#### **BECAUSE LOCAL PLANNERS ARE OFTEN INCOMPETENT**

Local forest planning should be considered so long as it is done by competent planners, which is often not the case. Local input to knowledgeable planners is most certainly a positive. (Individual, Corvallis, OR - #A1132.13100)

#### **BECAUSE THE POLITICAL WILL TO PROTECT ROADLESS AREAS CAN NOT BE FOUND AT THE LOCAL LEVEL**

Informed decisionmaking. The roadless areas have already been inventoried, their descriptions are in the forest plans, and their values are listed. Local planning is finished. We need only the political will to protect them. You won't find political will at the local level; it's hard enough to find it at the national level. Local meetings were held nationwide. I attended them, and I heard overwhelming support for complete protection. (Individual, Eugene, OR - #A13952.12100)

#### **BECAUSE ALLOWING LOCAL DECISIONMAKING WOULD WEAKEN THE ROADLESS AREA CONSERVATION RULE**

Forest-by-forest decisions do not need to be made. Not meaning to sound overly dramatic, but when we begin discussing and considering changing the protection for the national forest so decisions are made on a case-by-case basis, it will become too easy pick apart each forest one at a time with time, eventually

leaving us and future generations with nothing but a raped, wasteland. Please don't allow these protections that have already been put into place to be weakened. Know that not only do I strongly oppose weakening of our national forest protection through forest-by-forest decisions, but so do many of the other voters in America. We DON'T want to see logging and development in roadless areas. (Individual, Saint Petersburg, FL - #A202.13120)

As to "local control," I have serious reservations about ceding control of federal assets to any entity which is not directly accountable for their misuse. The Forest Service, through the President and unlike state or local entities, is accountable to the federal taxpayers and I expect them to take that responsibility seriously. The administration's current attempts to weaken the Roadless Rule do not appear to take this responsibility into account. (Individual, Broomfield, CO - #A211.13120)

#### **WITH LOCAL FOREST PLANNING SERVING IN AN ADVISORY AND TECHNICAL ASSISTANCE CAPACITY**

Local forest planning should serve in an advisory and technical assistance capacity. Ultimate decision-making authority should be maintained by the federal government. National Forests belong to all citizens of the United States of America; not just the local people in the vicinity of a subject forest area. (Individual, Olympia, WA - #A26693.13120)

### **239. Public Concern: The Forest Service should make management decisions only at the national level.**

#### **WITH NO ROOM FOR LOCAL INTERPRETATION**

Management of our national forests should be limited to enforcement of a national policy only. National forests are a public trust that belong to all Americans and are not suited to be managed according to the whims and limited perspective of a local manager. A national policy dictating the protection of all remaining national forests should govern all local manager administration with no allowance for interpretation.

National forests are for the use of all people and are to fall under the dominion a local community. (Individual, Petaluma, CA - #A17057.13210)

### **240. Public Concern: The Forest Service should not change the management guidelines of the Roadless Area Conservation Rule to conform to local government plans.**

The Forest Service has already provided states and local governments with ample opportunities to comment on the proposed roadless area rule, and incorporated many changes suggested during the public comment period into the final roadless area conservation rule. Under no circumstances should the management guidelines of the national roadless area conservation rule be "bent" to conform to local government plans. This is a national protection program to conserve a resource of national interest, undisturbed and unroaded natural areas. A national perspective must be maintained at all times. (Individual, Palo Alto, CA - #A15827.15130)

## **The Forest Planning Process**

### **Summary**

**General Comments** – General comments on the forest planning process are varied. According to one individual, the Secretary of Agriculture's five principles effectively states that the local forest planning process must be used, an implication that the Secretary gives no weight to any method of decisionmaking other than the local forest planning process. Others assert that roadless issues have already been adequately addressed in the forest planning process.

Some respondents say the Forest Service should clarify that, even with the Roadless Area Conservation Rule in place, many management decisions would continue to be made through the

forest planning process. Further, others assert, the local forest planning process is complementary and consistent with the Rule, and can therefore proceed in tandem with the Rule's full implementation.

Finally, some organizations claim that the National Forest Management Act does not actually mandate local forest planning (for more on the National Forest Management Act, see Chapter 2: National Forest Management Act).

**Development/Implementation of Forest Plans** – Some respondents comment on the development and implementation of forest plans. According to one individual, the Forest Service should ensure that any national forest without a forest plan in place immediately begin the public process of creating one. On a similar note, others recommend that forest plans be amended and/or revised in a timely manner and that the Agency make efforts to remove institutional impediments to implementing existing forest plans, especially in light of the considerable time and money that have already been invested in forest plan development.

**Public Participation in the Forest Planning Process** – A number of individuals comment on public participation in the forest planning process. Some suggest the Forest Service should ensure all stakeholders equal access to the forest planning process by proactively seeking them out and inviting their participation. Others state that forest plans should more adequately reflect the concerns expressed by the public during their development. One respondent says of his own experience that many people worked hard, both Agency and the public to develop a meaningful plan but when the final was released, it did not resemble their input. Finally, one individual suggests opening all local forest planning processes to the American public at large by posting local decisions on the internet for all to review and comment on.

**Appropriate Role of the Forest Planning Process** – Respondents offer a wide array of suggestions regarding the appropriate role of the forest planning process. Suggestions range from identifying local concerns, attitudes, issues, and problems that might otherwise remain unknown at the national level to implementing national directives and maintaining and protecting maximum amounts of remaining roadless areas. Some suggest its role is to restore natural processes to roadless areas, and to protect public lands from undue use. Others suggest that its role is to identify roadless areas that are not in the current inventory and roadless areas that need to be restored; to address management of uninventoried and unroaded areas; to determine roadless area boundaries and develop site-specific resource prescriptions compliant with the Roadless Area Conservation Rule; and to identify local resources that may merit additional protection. According to one organization, however, the appropriate role of the forest planning process cannot be determined until changes to the Planning Regulations are finalized.

### *The Forest Planning Process General*

#### **241. Public Concern: The Forest Service should consider that the Secretary of Agriculture's five principles imply that only the forest planning process must be used for managing Roadless Areas.**

*On May 4, the Secretary of Agriculture presented five principles on which the protection and management of roadless values should be based: 1. Informed decision making, using reliable information and accurate mapping and drawing on local expertise and experience through the local forest planning process.*

Very interesting. The Secretary of Agriculture is effectively stating that the local forest planning process must be used. . . . this statement implies that the Secretary gives no weight whatsoever to any method of decisionmaking other than the local forest planning process. This implication is grave indeed, as a closed mind is a most dangerous weapon. It also further erodes my personal confidence in the capability of the Secretary and the directives that issue from that office. And, in all cases where a position reports to another position higher in a hierarchy, such a case also erodes the confidence on the capabilities of selection, management, oversight, and acceptance of responsibility of the higher position. In this case, that position is the President of the United States. (Individual, Nederland, CO - #A19016.11110)

**242. Public Concern: The Forest Service should consider that roadless issues have been addressed in the forest planning process.**

There appeared to be a misconception that the roadless issues had not been addressed in earlier planning processes. The draft EIS noted that the roadless issues:

“ . . . have not been effectively resolved at the local level in many places . . . .”

However, review of the land use plans reveals that this is a very subjective statement that ignores the long history of this issue being addressed and resolved in local LRMPs, the Oregon Wilderness Act of 1984 and other Wilderness Acts, the Hells Canyon National Recreation Area Act, Oregon Omnibus Wild and Scenic Rivers Act. In every case the applicable roadless areas were reviewed and decisions made to allocate them to other land uses or otherwise release them from roadless or wilderness reviews. While Congress intended these acts to be compromises, the interest groups have clearly seen them as merely a shift in the goal posts and not the good faith compromises intended by Congress to resolve the issues. To maintain stability in the local communities it is important that the Forest Service adhere to these compromises and the land and resource management plan outputs. (County Attorney, Grant County, OR - #A17667.20200)

**243. Public Concern: The Forest Service should recognize that implementation of one of the Roadless Area Conservation Rule action alternatives amounts to an amendment to or modification of forest plans.**

**THE INYO FOREST PLAN**

The intent behind the Roadless Initiative is to in effect update or modify RARE II. The problem with this approach is that the entire Forest Plan process which resulted in the current Plan for the INF [Inyo National Forest] is now being leap-frogged or bypassed without USDA complying with NEPA or other applicable federal law. Implementation of one or more of the Action Alternatives in the Roadless Initiative will not only supersede or amend RARE II, but more importantly will amend or modify the [Inyo National Forest] Plan. (Business, Mammoth Lakes, CA - #A30296.20200)

**244. Public Concern: The Forest Service should ensure that the forest planning process is interdisciplinary and based on site-specific ecosystem considerations.**

The role of local forest planning is to prepare plans from an interdisciplinary perspective. Considerations are to be made on the requirement of all flora and fauna and how they all interact in the ecosystem. Mankind's desires for the use of these ecosystems are to be weighted against the impact of such uses. Such ecosystem based plans can only be developed on a site-by-site basis. (Individual, Evergreen, CO - #A19178.13200)

**245. Public Concern: The Forest Service should clarify that, with the Roadless Area Conservation Rule, many management decisions would continue to be made through the forest planning process.**

In addition to the numerous ways in which the Rule preserves local discretion to regulate those aspects of road-building and logging that do not threaten the greatest, most indelible harm, it leaves many other

roadless area management decisions to regulation through the National Forest Management Act (NFMA) planning process. For example:

The Rule does not bar off-highway vehicles (ORVs), instead leaving them subject to local regulation. As on other non-wilderness lands, ORV routes in roadless areas that are designated and managed as trails by the local national forest are not considered roads and therefore can be maintained by the agency.

The Rule does not prohibit or regulate mining for locatable minerals. Miners who would have a right to build a road through a roaded area will continue to have one through roadless areas.

Areas too small to be included by national forests in their roadless area inventories or never inventoried for other reasons are not covered by the final Rule. Their management is determined through local processes, under the Rule.

Regulation of grazing is left unaffected by the final Rule, despite the demonstrated link between grazing domestic stock in forestlands and increased in-growth of flammable understories. (Organization, Olympia, WA - #A20145.13130)

**246. Public Concern: The Forest Service should ensure that decisions reached through the local planning process cannot easily be changed by Congress.**

The results of properly conducted forest planning must be respected. Otherwise, planning is just a sham. The rules should make it more difficult for politicians to change decisions that were reached through the planning process. (Individual, No Address - #A17292.13000)

**247. Public Concern: The Forest Service should recognize that the local forest planning process is complementary and consistent with the Roadless Area Conservation Rule.**

**AND CAN PROCEED IN TANDEM WITH THE FULL IMPLEMENTATION OF THE RULE**

The Roadless Area Conservation Rule is not a substitute for local forest planning, nor is such local planning a substitute for the Rule. Local forest-by-forest planning is thoroughly complementary and consistent with full implementation of the Rule, and can proceed in tandem with it as it does with other national rules and legislation designed to protect our public lands. Those who have criticized the Rule as a top-down federal imposition on local forest planning ignore that fact, as well as the Rule's remarkable public support throughout the country and the critical role of enlightened federal policymaking in conserving our public lands. (Individual, Wonalancet, NH - #A8275.13110)

**248. Public Concern: The Forest Service should recognize that the National Forest Management Act does not mandate local forest planning.**

The NFMA does not provide any specific direction for "local forest planning".

Section 1612 of the Act deals with "Public Participation"; subsection (1) addresses "Adequate notice and opportunity to comment"; and subsection (b) deals with "Advisory Boards." Subsection (b) states:

In providing for public participation in the planning for and management of the National Forest System, the Secretary, pursuant to the Federal Advisory Committee Act (86 Stat. 770) and other applicable law, shall establish and consult such advisory boards as he deems necessary to secure full information and advice on the execution of his responsibilities. The membership of such boards shall be representative of a cross section of groups interested in the planning for and management of the National Forest System and the various types of use and enjoyment of the lands thereof.

Note that there is no reference to "local planning, the advisory boards are not mandatory, and if implemented should show a cross section of groups. WildLaw interprets this to include environmental organizations. WildLaw also believes that the absence of "local" planning in the Act was intentional. (Organization, Montgomery, AL - #A27512.15121)

The NFMA does not provide any specific direction for "local forest planning". Section 1612 of the Act deals with "Public Participation"; subsection (a) addressed "Adequate notice and opportunity to comment"; and subsection (b) deals with Advisory Boards." Subsection (b) states:

In providing for public participation in the planning for and management of the National Forest System, the Secretary, pursuant to the Federal Advisory Committee Act (86 Stat.770) and other applicable law, shall establish and consult such advisory as he deems necessary to secure full information and advice on the execution of his responsibilities. The membership of such boards shall be representative of a cross section of groups interested in the planning for and management of the National Forest System and the various types of use and enjoyment of the lands thereof.

Note that there is no reference to “local” planning, the advisory boards are not mandatory, and if implemented should show a cross section of groups. The UEC interprets this to include environmental organizations. The UEC also believes that the absence of “local” planning in the Act was intentional. Congress set aside the public lands for the enjoyment of all Americans, not just those who live in the state where the land exists. (Organization, Salt Lake City, UT - #A17170.13110)

**249. Public Concern: The Forest Service should consider that, by its own actions, it has disabled itself from managing roadless areas through the normal planning process.**

The role of the Forest Service in evaluating roadless areas has been a catch 22. The Forest Service was not legally compelled to perform its RARE studies, but having done so in a way that was then deemed unsatisfactory to the federal courts, the Forest Service inadvertently disabled itself thereafter from managing the roadless study lands through the normal planning process. (Individual, Spokane, WA - #A17819.45400)

*The Forest Planning Process – Development/Implementation of Forest Plans*

**250. Public Concern: The Forest Service should ensure that any national forest without a forest plan in place immediately begin the public process of creating one.**

**BECAUSE FORESTS WITH PLANS IN PLACE DO NOT NEED ADDITIONAL ROADLESS AREA PROTECTION**

The decision of how to manage individual inventoried roadless areas should be broadly based on the five principles outlined by Secretary Venneman on May 4, 2001. For each national forest it should be a function of the forest plan. Any national forest with forest management plan in place should have no immediate need of any additional roadless area protections added at least until a forest plan revision is done. Any forest without a plan in place should immediately begin the public process of creating one. (Individual, Ketchikan, AK - #A23219.13200)

**251. Public Concern: The Forest Service should ensure that forest plans are amended and/or revised in a timely manner.**

Forest plans must be amended and/or revised in a timely manner in order to address the protection of roadless areas. However, the Forest Service cannot, on the one hand, acknowledge the role of forest plans to make future decisions about roadless area management while on the other hand ignoring forest plan decisions about roadless area management. This is especially true for the national forests that have completed a revision of their forest plans. Inventoried roadless areas have been subject to in-depth analysis and evaluation since the first Roadless Area Review (RARE I) in 1972. During development of the forest plans, the presence or absence of a road did not exclusively drive the decisions on land allocations, but more appropriately, decisions were based on examination of the full range of values on these lands. This should be the same for future amendments and revisions of the plans. (Business or Association, Washington, DC - #A26728.13200)

**252. Public Concern: The Forest Service should consider the time and money that has already been invested in forest plan development.**

We are especially concerned that the Roadless Rule changed portions of the just-revised Black Hills National Forest Plan dealing with management of roadless areas. Many public and private organizations and residents of the Black Hills Region invested a lot of time and energy over the 7-year process to revise the Plan. (Business, Rapid City, SD - #A30145.20201)

NFMA makes the land and resource management plan (forest plan) the focal point for management of each national forest. The proposed rules runs counter to the NFMA and the 36 C.F.R. Part 219 provisions on forest planning. The national rulemaking would override most of the 124 forest plans the agency has prepared at great public expense. Our tax dollars are being wasted as a result of lack of consideration for local forest planning. (Professional Society, Anchorage, AK - #A21707.20201)

**253. Public Concern: The Forest Service should make efforts to remove institutional impediments to implementing existing forest plans.**

The Forest Service's focus on planning while failing to implement its existing plans in a timely manner has had a significantly negative impact on our local communities. It is our position that the time and monies of the Forest Service would be better spent in removing the institutional impediments to implementing the existing forest plans. (Elected Official, Douglas County, OR - #A11811.13000)

**254. Public Concern: The Forest Service should use the National Forest Management Act processes in developing forest plans rather than the Forest Service Manual 7710 road management policy.**

The policy (FSM 7710) governing road management must be re-examined also. It does not allow for adequate input from those affected and has probably been the cause for much of the distrust and anger many of the citizens have displayed and continue to display towards the Forest Service. Roads have been closed to protect the environment (erosion into streams) while cattle continue to damage the stream bank and put more silt into the stream than the road ever did. Roads have been closed off a couple hundred yards from ideal campsites used by elderly and disabled for causing safety concerns with backing and congestion at the road end. All this could be avoided if properly administered NFMA processes and not the FSM 7710 road management policy were used to develop plans. Individual area advisory groups are critical to the process. (Individual, Rock Springs, WY - #A22428.20500)

*The Forest Planning Process – Public Participation*

**255. Public Concern: The Forest Service should ensure all stakeholders equal access to the forest planning process.**

**BY PROACTIVELY SEEKING OUT STAKEHOLDERS AND INVITING THEIR PARTICIPATION**

The Forest Service should ensure that all stakeholders have equal access to the deliberative process and have an equal opportunity to provide input. No single group or individual should be granted special access through private meetings or similar arrangements. The Forest Service should be proactive in seeking out stakeholders and inviting their participation. At a minimum, one individual in each regional office should be designated with this responsibility as a full-time job. A better, but probably not cost-effective approach would be to have one individual in each national forest. The key perception to be created is that all stakeholders have an equal opportunity to participate in the process and that no stakeholders are granted special privileges. (Individual, Marietta, CA - #A4827.15000)

**256. Public Concern: The Forest Service should encourage timely participation in the forest planning process.**

States, tribes, local communities, other organizations and individuals can be led to the process but cannot be forced to participate in it. However, if they do not participate in a timely manner there should be

some way of preventing their coming up out of the woodwork at a later date to function as spoilers. (Individual, Olympia, WA - #A278.15111)

**257. Public Concern: The Forest Service should ensure that forest plans reflect public concerns.**

Some years ago my wife and I drove 200 miles (one-way) to participate in the public meetings for a Forestry Plan which lasted about six months. The two dozen well educated Citizens and USF professionals worked hard to build a meaningful PLAN. But in the END the FINAL PLAN I was mailed had no resemblance to the meetings I attended. (Individual, Center Sandwich, NH - #A3669.15110)

Working Together. The best way for the Forest Service to work with the various government entities and publics is through the NEPA and NFMA public involvement processes. These provide for public input in an open decision-making manner. That is, people are encouraged to enter into collaborative discussions early and often in the decision-making process, and the agencies not only listen carefully to those publics but incorporate their wishes and desires in a range of alternatives that considers all view points.

The open decision-making process often breaks down at this latter point. For instance, in the preferred alternative for the Wasatch-Cache revised forest plan, the Forest proposes to adopt the Clinton roadless rule and treat all roadless areas exactly the same. This is in direct opposition to the input the Forest received, which suggested some areas remain roadless and some be developed. The Wasatch-Cache personnel listened to the public, but then it imposed its own values on the interested parties.

The hard part of an open decision-making process is that it requires the agency to give up some control over the forest and share that control with the public. Some Forests have not mastered this technique yet. Our point here is that the Forest Service should use the NEPA/NFMA regulations to collect public input and then incorporate that input into management direction in a fair and impartial manner without overriding that input with their own values. (Elected Official, Clark County, Dubois, ID - #A23504.20200)

**258. Public Concern: The Forest Service should recognize local contributions to forest plans.**

We are very concerned about the lack of attention being afforded the local communities' contributions in the land and resource management planning processes. In a rather arrogant and patronizing manner, the DEIS arbitrarily and capriciously dismissed the LRMPs as being adversely influenced by the local communities. The DEIS implied that the land allocations and management decisions relative to the roadless areas were made by the local Forests without input from the regional offices or Washington office. Contrary to the DEIS implication, review of the planning process reveals that prior to adoption, all of the LRMPs were reviewed by the Regional and Washington offices. Likewise after adoption, any appeal or challenge to the LRMPs were resolved at the Regional office and generally only after concurrence by the Washington office. The DEIS statement is simply an insult to those parties who participated in the LRMP process and serves to discourage public participation in any future planning efforts. Absent a more in-depth justification for this proposed rule, it is our position that this action is not supported by history and undermines the entire forest planning process. (Elected Official, Douglas County, OR - #A11811.15111)

**259. Public Concern: The Forest Service should open all local forest planning processes to the American public at large.**

**BY POSTING LOCAL DECISIONS ON THE INTERNET FOR ALL TO REVIEW AND COMMENT ON**

I recommend that all local forest planning processes be opened up to the American public at large. Decisions made at these local forest planning sessions should be made public on the Internet for all Americans to review and comment on. These are our lands, after all, and we have the right to know what is being done to them, and how well the local administrators are implementing the wishes of the American people. (Individual, Ballwin, MO - #A17037.13210)

## *The Forest Planning Process – Its Appropriate Role*

### **260. Public Concern: The Forest Service should consider the appropriate role of the forest planning process.**

#### **TO IDENTIFY LOCAL CONCERNS, ATTITUDES, ISSUES, AND PROBLEMS THAT MIGHT OTHERWISE REMAIN UNKNOWN AT THE NATIONAL LEVEL**

I agree with the USFS [United States Forest Service] conclusion that the best way to reduce conflicts involved with the management of roadless areas is through a national level rule. The fact that over half of the roadless area acreage has prescriptions allowing road construction and reconstruction indicates input at the local level does always promote national policy.

I believe the appropriate role of local forest planning in evaluating protection and management of inventoried roadless areas (IRAs) is to provide constructive input. This would include identifying local concerns, attitudes, issues, and problems that might otherwise remain unknown at the national level. This local participation would at least “flavor” national directives, and regional and forest level resources will still be responsible for day-to-day management. (Individual, Vista, CA - #A4838.13100)

#### **TO ASSESS THE IMPACTS OF A PROPOSED ACTION**

The appropriate role of local forest planning in evaluating, protecting and managing of inventoried roadless areas is to assess the impacts of the proposed action and to integrate those impacts into the process so the public is aware of the consequences. (Business or Association, Sandy, UT - #A15656.15111)

#### **TO RESOLVE ROADLESS ISSUES**

FOIA notices that questions #1, #2, and #9 deal with public input as required by the National Environmental Policy Act of 1969 (NEPA). We strongly feel that Congress in passing the 1969 act did not intend for public input to become a tool to stop management activities on federal lands. It is very unfortunate that some groups have used this tool for that purpose. Diverse groups will work together in a collaborative manner only when there is the common desire to resolve an issue. It is unfortunate that some groups have no desire or incentive to see the roadless issue resolved. Solving the roadless issue is best accomplished through the forest planning process as directed in the National Forest Management Act of 1976 (NFMA) and settlement of the RARE II lawsuits. The Forest Service should proceed in a responsible manner. (Business or Association, Coeur d'Alene, ID - #A15260.15000)

#### **TO MAINTAIN MAXIMUM AMOUNTS OF REMAINING ROADLESS AREAS**

The appropriate role of local forest planning is to maintain a large-scale inter-connected national view, and thus maintain the absolute maximum amounts of remaining roadless areas, for the greatest local and national public value. (Individual, No Address - #A4499.13100)

#### **TO PROTECT ROADLESS AREAS**

Your agency is supposed to be managing the forest on behalf of a national constituency, the vast majority of which is overwhelmingly supportive of conservation-based management practices as exemplified by RACR. Therefore here are some short answers to “What is the appropriate role of local forest planning:”

- a. Insure the roadless areas remain protected.
- b. Prevent damage from off-road vehicles. (Individual, Somers, MT - #A11866.13210)

The appropriate role of the local forest planning (as noted, required by NFMA) is to manage the roadless areas as roadless areas. This means exactly what it says, no roads. Access is restricted to non-motorized vehicles that can negotiate trails or trail-less areas. The local forest planning should regard this charge as seriously as it regards any other charge it has, including timber or mineral production. (Individual, Cleveland, SC - #A21250.13200)

The proper role of local forest officials should be to protect the roadless areas from destruction thru the unnecessary creation of emergency (i.e. fires) and from other maintenance activities that necessitate road building.

The local officials should become stewards of the land. They should develop an intimate knowledge base, and a connection with the land around them. However, they should not have the final say as to the fate of these roadless areas and a system ensuring decisions are made with best interest of the ecosystem in mind should be put in place. Ensuring both local and national opinions are heard on these matters is essential.

Local officials should be the first people to profess the sacredness of the land they oversee. They should be the first line of defense against those who would expose these pristine roadless areas to the affects of increased traffic, loss of habitat, and edge effects. (Individual, Walla Walla, WA - #A17698.13110)

Local forest planning should incorporate a strong Roadless Protection Policy. Logging and road building should be prohibited in the plans. Local forest planning should then focus on all the other multiple uses which occur in inventoried roadless areas, balancing them in a way that best serves the needs of today's Americans, wildlife, clean water, and ecosystems processes with the future. Consideration should be given to creating quiet trails, where motorized use is prohibited, while ensuring that there are opportunities for motorized recreation in other places—a process also known as zoning. Logging and road restoration and maintenance may continue on roaded lands as determined in the local planning process. (Individual, Sun Valley, ID - #A20628.13110)

#### **TO RESTORE NATURAL PROCESSES TO ROADLESS AREAS**

The matter concerns wilderness not forest lands, which are already considered silva/agricultural use lands. As far as these roadless lands are concerned the appropriate role of forest planners should be to get out of the way and let nature take back its role. Official demands of forests planners only seek to upset the balance unless it includes the reintroduction of native species to their ancestral home. When it comes to these roadless areas we should not entrust our future to those who would respond to undue political pressure to abuse them for commercial exploitation such as is being designed in the ANWR and many other precious places that thieves might wish to eviscerate. (Individual, No Address - #A13403.13110)

#### **TO PROTECT PUBLIC LANDS FROM UNDUE USE**

Sight should not be lost that the Forest Service represents the people of the United States. Public forums and correspondence should not be used to let the various interests unduly influence management and protection of public lands. It is the duty of the Forest Service to primarily inform local interests of intended procedures for management and protection and incorporate worthy suggestions in the agency's plans certainly not to negotiate away the people's right to expect that public lands will be protected from undue use and exploitation by interest groups. (Individual, No Address - #A9085.15120)

#### **TO IMPLEMENT SUSTAINABLE FOREST MANAGEMENT PRACTICES**

The role most appropriate for forest planning is to implement sustainable forest management practices for the common good of ecosystems, water quality and quantity, game and non-game wildlife, recreation and scenic value for all Americans in perpetuity, with appropriate low impact (light human touch) sustainable use of forest resources and products with appropriate avoidance measures and restoration. I truly believe that our National Forests can provide to our society, while identifying key roadless areas which promote biodiversity and critical connecting corridors to sustain wildlife populations that have been omitted from the Forest Service inventories, and locating and managing ORV use in ways that provide this popular outlet while avoiding or minimizing damage to sensitive areas. (Individual, Watsonville, CA - #A6767.15160)

#### **TO DETERMINE ALLOWABLE ACTIVITIES IN ROADLESS AREAS**

In question 7 you asked of specific activities forbidden or allowed. As I previously pointed out, if the Forest Plan is used as the vehicle to deal with the roadless question I think many areas will have specific prohibitions, as well as more allowances, but may remain roadless. These should fit the expected management goals and direction. These should be decided during the Forest Planning process for each

Forest. This will make the decisions and the expectations relatively clear and hopefully compatible with the ecosystem's capability to sustain the goals that are set forth. When roads are a high-risk element for a number of reasons it seems appropriate for the area to remain roadless. When priorities in management direction require treatments that require roads they should be allowed and controlled to meet those goals. (Individual, Cambridge, ID - #A11714.13200)

#### **TO ADDRESS ACTIVITIES NOT REGULATED BY THE ROADLESS AREA CONSERVATION RULE**

New Forest plans should address activities not already regulated by the existing roadless rule. These include wildfire for resource benefits, prescribed burning, wildlife habitat improvement, noxious weed control, off-road vehicle and other recreational uses. Road building and timber harvesting are sufficiently addressed by the existing rule. (Individual, Bend, OR - #A27922.30100)

#### **TO DETERMINE ROADLESS SUITABILITY, RECREATION OPPORTUNITY, AND DESIRED FUTURE CONDITIONS**

Forest planning should only determine roadless suitability, recreation opportunity, and determine desired future condition for ecological as well as social values. Management of the roadless areas should fall within a national roadless area management strategy. (Individual, Ennis, MT - #A2249.13120)

#### **TO COLLECT DATA AND ENFORCE FEDERAL REGULATIONS**

Forest planners on the local level should be responsible for data collection and enforcement of federal regulations. Local-level forest service officials should have a say in how these areas are managed, but theirs should be one voice in contribution toward federal level enforcement and protection. (Individual, Reno, NV - #A20755.13130)

The appropriate role of local forest planning in the evaluation and protection of roadless areas should extend exclusively to the collection and distribution of data regarding threats to the roadless status of these areas. Management of roadless areas should be similarly limited. (Individual, Seattle, WA - #A21681.13200)

#### **TO IMPLEMENT NATIONAL DIRECTIVES**

Local forest plans should be done to implement national directives and to make clearly local, ecosystem-specific management decisions. However, these are "National" Forests, not state or county property. Roadless designation and overall management guidelines for roadless area management are national issues. Where local Forest Service managers can provide evidence that variation from national policy is necessary, they should present proposed modifications for public scrutiny and higher level approval; with the "public" clearly meaning all citizens of the United States. (Organization, Helena, MT - #A20874.13130)

Given the role of local forest planning in the history of declining watersheds and entire ecosystems in the Interior Columbia Basin, as well as other Forest Service and BLM-administered regions, and adding to that the vast supply of examples from every national forest of deplorable local decisions on watershed and forest management, we all should be loathe to turn crucial decisions on remaining roadless areas over to those "who know local conditions best." Relying on local managers to resist industry, local business and vociferous local public pressure to develop the national public roadless lands is the opposite of good public administration or natural resource stewardship and preservation. The appropriate role of local forest planning as it relates to roadless areas is to carry out the national policy and nationally established goals, objectives, standards and guidelines for roadless areas. There is much exaggeration of local and regional differences, but before ICBEMP was emasculated by the Supplemental EIS decision, clearly workable provision for regional climatic and other differences was made in the standards and guidelines.

Considering the current weakening of the forest planning regulations by the present national administration, I have no reason to believe that future forest plans will protect roadless areas any better than they have in the past. Almost 3 million acres of roadless lands have been lost in the last 20 years through the individual national forest planning process, and the Forest Service has estimated that an

additional 6 million acres could be lost over the next twenty years if the Roadless Area Conservation Rule is not retained. (Individual, Bigfork, MT - #A17221.13120)

#### **TO IMPLEMENT AND ENFORCE EXISTING LAWS, RULES, AND REGULATIONS**

The appropriate role of local forest planning is **to obey the laws of the land**. Although many wish we did not have a Multiple Use-Sustained Yield Act of 1960 . . . I like the thing. And I will tell you why. It is one page long, a simple document, and it says that the public's lands must not be managed for the greatest dollar return or the greatest unit output. It also says, and I quote: "The establishment and maintenance of areas of Wilderness is consistent with this Act." Therefore, I repeat, the appropriate role of local forest planning is to implement the laws Congress has given it. (Individual, Albuquerque, NM - #A19061.15161)

The Forest Service's legacy is not a pretty one. Decades of mismanagement have led to the fragmentation of forest ecosystems, liquidation of old growth forests, and the demise of many fish and wildlife species. In the Northwoods, for example, less than one (that's the numeral 1) percent of white pine remain and species such as the Canada Lynx teeter on the brink of extinction. The area that is the birthplace of John Muir, Aldo Leopold, and the location of Sigurd Olson's "singing wilderness", is unraveling after a century and a half of logging and mining. Species in the Northwoods, including the Boreal owl, wolverine, and northern goshawk are quickly disappearing. Off road vehicles run roughshod over public lands across the country. And mineral hard-rock mining projects have severely compromised the biological integrity of the region. All of these developments were made possible under the forest planning process.

Local planning should be used to determine how protective laws, rule, and regulations can be enforced, and how existing uses should be apportioned (increased or reduced; limited to certain areas and times, and not allowed on/at others) so as to meet the demands of the 90% of Americans who said they favor total protection of roadless areas. Local planning should include better and more diligent surveying of the Forests to find smaller patches (down to 1,000 acres) of roadless area, so those can be protected. (Individual, Minneapolis, MN - #A10523.13110)

#### **TO CARRY OUT APPROVED PLANS**

Part of the "appropriate role for national forest planning" includes carrying out approved plans. Local forests have evaded the law and failed to follow their own plans in many cases. For example, the Jefferson National Forest routinely fails to meet Forest Plan requirements for road densities in bear, turkey, and even some deer feature habitat and refuses to take steps to comply with the Plan (See JNF Forest Plan IV-153-55; Mand E Rpts; My appeals of the Hagan Hall, Bark Camp, Wilson Mtn., Bannister Br., Peters Mtn., and other JNF timber sales.) See also my 3/30/98 Roadless Letter, pp. 3-5 on George Washington NF mismanagement in Management Area 14 (MA 14—remote habitat for wildlife) and elsewhere in the GWNF. (Individual, Roaknoke, VA - #A23081.13210)

#### **TO SERVE AS THE MEDIATOR BETWEEN INDIVIDUALS AND THE FOREST SERVICE IN IMPLEMENTING THE ROADLESS AREA CONSERVATION RULE**

The local Forest Service officials should be the middlemen and women between the concerned individuals and the National Forest Service. For instance, the local officials should be communicating with individuals with inholdings within the inventoried roadless areas, trying to make sure that access to their parcel of land is not a problem. Local officials should also be in communication with all those who have preexisting mining rights in these areas, working with them to see how they can best extract the resources to which they are entitled. Moreover, local officials should determine where forests require thinning in order to prevent devastating forest fires, etc. The provisions and exceptions to the rule should be overseen and administered by local Forest Service officials in consultation with National Forest Service representatives and, of course, Chief Bosworth. In other words, the Forest Service should work with the communities affected in order to expedite the transition and work out specifics, but the National Forest Service should not cater its forest management policies to the best interests of local communities. The best interest of the country and the preservation of its forests should be the basis of any legislation. (Individual, Dallas, TX - #A17005.13210)

**TO IDENTIFY SITUATIONS THAT MEET THE EXCEPTIONS ALLOWED IN THE ROADLESS AREA CONSERVATION RULE**

Local forest planning, including forest plan revisions or amendments should be use to identify situations that meet the exceptions adopted under the previous Roadless Rule and suggest that these exceptions be stated narrowly and explicitly, and addressed through forest plan revisions or amendments. (Columbia River Inter-Tribal Fish Commission, Portland, OR - #A20331.13211)

**TO IDENTIFY ROADLESS AREAS THAT ARE NOT IN THE CURRENT INVENTORY AND ROADLESS AREAS THAT NEED TO BE RESTORED**

There are 10,000 miles of roads on the one national forest that I work with most closely, the Wallowa-Whitman National Forest in northeastern Oregon. Local forest planning has not been protecting roadless areas. The Roadless Area Rule will provide for protection of the last remaining areas that are roadless. Local planning should identify areas that are roadless, and are not yet in the forest's inventory. Local planning should also identify areas that should be restored to roadless, where the only current roads are those that have been illegally made by users, without any public input, scientific review, or landscape-level considerations. (Individual, Eugene, OR - #A15651.13110)

Update roadless inventories to catch what staff missed, inadvertently or deliberately the first time around. (Individual, Somers, MT - #A11866.13210)

**TO ADDRESS MANAGEMENT OF UNINVENTORIED AND UNROADED AREAS**

Forest planning has a role to play in determining management of these areas as allowed under the rule (for example, trail location or construction, endangered species management actions, etc.). Forest planning should also be used to address the management of un-inventoried and unroaded areas, which are not addressed by the current rules. (Organization, Boston, MA - #A23083.13210)

The local forests should have total control over designating what are true roadless areas and which areas are not. They further need to have full authority to determine road conditions, access, and route locations without costly analysis or approvals from the regional or national levels. The local forests need to have authority to remove areas or designations if inventoried roadless areas have been roaded or had vehicle access for the past 10 or 100 years. (Individual, Alturas, CA - #A28581.13110)

It is appropriate at the local level, in local forest plans, to indicate not whether (it is a given under the Conservation Rule), but how roadless areas will be preserved. Also at the local level, forest planners should examine uninventoried roadless areas and their potential for preservation and use by OHVs, which was not addressed in the national rule. (Individual, Minneapolis, MN - #A30387.13000)

**TO DETERMINE ROADLESS AREA BOUNDARIES AND DEVELOP SITE-SPECIFIC RESOURCE PRESCRIPTIONS COMPLIANT WITH THE ROADLESS AREA CONSERVATION RULE**

NFMA provides that plans may "be amended in any manner whatsoever after final adoption after public notice . . . ." Thus, a national rule setting forth standards for the protection of Roadless areas that has the effect of amending local forest plans is fully consistent with NFMA's procedures. Just as local planning must incorporate the effect of other national-level decisions, e.g., congressional wilderness designation, Forest Service Manual and Handbook directives, and national monument designation, so, too, local planning has to accommodate national level policy decisions regarding road building and protection of Roadless areas. Unless national circumstances change, e.g., the 8 billion dollar road maintenance backlog is eliminated and social preferences for protecting backcountry wild lands are reversed, local forest planning is not the appropriate venue to revisit national Roadless policies.

On the other hand, local forest planning can more precisely determine Roadless area boundaries and develop site-specific resource prescriptions within the constraints of national Roadless area policy. (Organization, Craig, AK - #A23228.20201)

The role of local Forests is not to determine if roadless areas should be protected, but how they should be protected. The reason the public demanded a national rule to conserve roadless areas was because

local Forest Service officials were unwilling or unable to do this themselves. Once the national RACR is reaffirmed, this should provide the framework for local forest planning to determine the best means and methods for fully implementing the rule. For example, local Forests should determine which roads may need to be blocked, decommissioned, and/or obliterated. Also, boundaries for roadless areas can be located to include previously uninventoried and unroaded areas for protection. (Organization, Eugene, OR - #A21798.13110)

#### **TO CONSIDER EACH ROADLESS AREA AND HOW IT IS INTERTWINED WITH SURROUNDING LANDS**

When Big Mountain went through the NEPA process, the Flathead Forest requested us to provide them with cumulative Efforts Mode (CEM) for an area encompassing approximately 100 square miles. Our permit area covers 2300 acres. We did this, and it has been a valuable tool for both our staff and Forest Service staff. This process forces everyone to consider all the resources, uses, and values when considering an array of alternatives. The Forest Plan could be the venue to consider each of these proposed roadless parcels, and how they are intertwined to surrounding lands. (Permit Holder, Whitefish, MT - #A20669.13220)

#### **TO IDENTIFY LOCAL RESOURCES THAT MAY MERIT ADDITIONAL PROTECTION**

As provided by the Roadless Rule, the appropriate role for local forest and grasslands planning is to identify local resources that may merit additional protection within or adjacent to roadless areas, such as by infrastructure retirement or site restoration. Local plans should also identify roadless areas that were omitted from current Forest Service inventories. Local planning processes can also develop improved management plans for the existing road network, to be implemented using resources that may otherwise have been expended developing roadless areas. (Organization, Reston, VA - #A21625.13200)

#### **TO ADDRESS MANAGEMENT OF NATIONAL GRASSLANDS**

Management of the National Grasslands should include decisions made through the forest planning process, which utilizes local knowledge and best available science. A decision based on one national directive negates the well-established planning process and collaborative approach used in the forest planning process. The Roadless Rule now under comment demonstrates a lack of information in formulating the rule. (Governor, State of North Dakota - #A22065.13110)

The National Grasslands contain a checkerboard pattern of state, federal and privately owned surface and mineral acres that the rule does not recognize or consider. The Grasslands contain a host of diverse values including oil and gas production, ranching and tourism all of which are integral parts of the economic and social fabric of the state and western North Dakota. The management planning process provides the best method of addressing the needs for accessing diverse properties and accommodating the values and uses associated with the Grasslands. (Governor, State of North Dakota - #A22065.13200)

#### **TO FOCUS ON EDUCATION AND RESEARCH**

Local forest planning needs to focus on education and research to try to sustain the forest that we have left. (Individual, No Address - #A17946.13200)

#### **TO EDUCATE COMMUNITIES ON THE ECOLOGICAL IMPORTANCE OF ROADLESS AREAS**

The appropriate role of local forest planning is to educate planners and communities as to the importance of roadless forests to both biodiversity and ecosystem functions that sustain fisheries and provide flood control (among other ecosystem services). Local communities should be educated that remaining roadless habitats represent a vast minority of Forest Service lands and that protecting them merely helps to balance roaded areas—those that already contain an excessive 400,000 miles of roads. (Individual, Davis, CA - #A30523.15163)

**261. Public Concern: The Forest Service should recognize that the appropriate role of the forest planning process cannot be determined until changes to the Planning Regulations are finalized.**

The “appropriate role” of the planning procedures required by NFMA is impossible to determine since the planning regulations have been recently revised and then subsequently temporarily withdrawn. It is impossible for the general public to answer this question until the Planning Rule changes are finalized.

Since the primary purpose of any NEPA process is full public disclosure of proposed changes and their impacts on the human environment we would advise the agency to withdraw the rule until the planning regulations are finalized. (Organization, No Address - #A30533.20000)

## Working Together (Question 2)

**Question 2: Working Together. What is the best way for the Forest Service to work with the variety of states, tribes, local communities, other organizations, and individuals in a collaborative manner to ensure that concerns about roadless values are heard and addressed through a fair and open process?**

This section includes three subsections: Adequacy of Public Involvement Processes/Methods, Public Involvement in Decisionmaking, and American Indian Rights and Interests.

### Adequacy of Public Involvement Processes/Methods

#### Summary

**General Comments** – A number of respondents advise the Forest Service to reevaluate its public participation processes to ensure fairness and honesty. People suggest methods to enhance the public participation process, ranging from using mass media, to revising language, to emulating the processes of other agencies or field unit such as the Bureau of Land Management and the White Mountain National Forest. Some comment that the Forest Service should not claim that the amount of public input received on the Roadless Area Conservation Rule constitutes quality public involvement. However, the greater part of responses regarding public involvement processes assert that the public involvement efforts for the January final Roadless Rule were adequate.

**Adequacy/Availability of Information** – Most who comment on this topic address the need for adequate public notification of pending management proposals. Writers furnish various suggestions to address this need including notifying people on Forest Service mailing lists and posting information on web sites. Along these same lines, people also suggest establishing consistent terminology and reporting procedures for advance notices. Some state that the Forest Service should provide site-specific information in order to allow informed comment. One organization reminds the Agency that decisions relative to the designation of roadless areas cannot be made in a vacuum. They believe that there must be access to information regarding specific inventories before reaching consensus.

**Adequacy of Public Meetings** – A number of respondents request that the Forest Service conduct another round of public meetings. Some request fewer, more productive meetings. People also suggest conducting public meetings that are, what they consider, legitimate, that comply with federal rules, that are held at convenient times and places, and that discuss local areas of concern and possible modifications to the Roadless Area Conservation Rule. Some comment that the Forest Service should conduct as many public meetings as were conducted for the Rule. Others request that the Forest Service improve citizen participation in public meetings.

**Adequacy of Comment Period/Timeframe** – Some comment that the Forest Service should allow a more adequate comment period for the Advance Notice of Proposed Rulemaking. As one

individual remarks, the comment period of 60 days is believe to be inadequate and unfair to the American public, and reflects requests for extensions, —some to 90 days, others to as much as 240 days. Another respondent suggests that the final Rule had so many deficiencies that an additional comment period would be insufficient. Several others assert that extending the comment period to seek out a more diverse public sentiment is a way of killing the roadless proposal.

Just as respondents comment on the adequacy of the comment period, they comment on the adequacy of the time frame for rule development in general. Some people suggest that the time frame for development of and comment on the Rule was adequate while others say it was not. Those who state that the timeframe was adequate say that enough time has been spent asking for public input and that more delay would only allow more harm to the environment and undermine the Rule. Those who claim the timeframe was inadequate state that the process was used to rush the Rule through without enough attention to detail, as is evidenced, they claim, by poor data and numerous mistakes.

**Use of Science/Best Information Available** – The use of science in decisionmaking is a topic of comment to a number of respondents. One individual states that the Agency should not be biased by user needs but by good, reliable, peer reviewed science. People also provide suggestions as to how the Forest Service should best incorporate science into decisionmaking and why science should take precedence. Several respondents advise the Forest Service to heed the counsel of scientific committees. Others comment that opinions submitted by the public should not be accepted as scientific fact and that the Forest Service should scrutinize the studies submitted by representatives to validate the information.

**Adequacy of Public Comment** – Many assert that the opportunity for and volume of public comment on the Roadless Area Conservation Rule was adequate. Some suggest that there was sufficient local input on the Rule as well, and one individual requests the Forest Service explain its assertion that there was inadequate local input. A few respondents suggest that the only groups objecting to the adequacy of the public comment process for the Rule are those that don't want it.

**Analysis of Public Comment** – Some respondents comment about the way public comments are analyzed and suggest that they should be adequately and quantitatively analyzed and reported. One organization states that it was disappointed in the review process of comments on the [Roadless Area Conservation Rule] and found that the manner in which the comments were analyzed and reported made it extremely difficult to determine the desires of the respondents. Suggestions to improve analysis include accurately tabulating comments, creating transcripts of public meetings, verifying the validity of organized response letters, and disclosing the details of late submissions.

**Scope of Public Comment to be Considered** – A number of respondents advise the Forest Service to respect the comments already received for the Roadless Area Conservation Rule, frequently suggesting that those comments be considered along with those submitted for the Advance Notice of Proposed Rulemaking. Some suggest that the Forest Service should disregard organized response letters, while others suggest it not accept mail-in public comments.

**Consideration of and Response to Public Comment** – A number of respondents assert that the Forest Service should consider all comments. One individual believes that all comments should receive sincere consideration, regardless of whether they are form letters. Some suggest that the

Forest Service should give all parties' comments equal weight while, on the other hand, others provide suggestions on how the Forest Service should differentially weigh public comments. Suggestions include giving greater weight to local and resource-dependent interests; giving less weight to organized response letters; and giving greater weight to professional foresters, wildlife biologists, and fire managers. Some also suggest that the Forest Service should evaluate the consideration it ought to give to the majority opinion—and believe the Agency should give serious consideration to the majority opinion (see also Chapter 3: Competing Values/Limited Resources (Question 9): Managing Competing Interests: *Will of the Public/Elected Representatives*), while others say the comment process should not be turned into a vote. Finally, some comment that the Forest Service should not only adequately consider public comment, but should adequately respond to it as well.

### *Adequacy of Public Involvement Processes/Methods General*

#### **262. Public Concern: The Forest Service should reevaluate public participation processes.**

##### **TO ENSURE FAIRNESS**

I feel strongly that President Bush's 60 day notice period is too short of a time period for the public to make informed comments, or to have enough time to hear about the reopening of the comment period. Instead, I am concerned that it favors wealthy corporations and special interests with the resources necessary to quickly mobilize a desired message in a short amount of time. First and foremost, I believe that the process itself needs to be evaluated for fairness, or the final outcome will represent the interests of institutions and corporations with money and mobilizing power, not necessarily those of the public.

I feel that your biggest mistake would be to reconfirm in the minds of Americans the suspicion that the government and the USFS doesn't work for them, but works for large, powerful corporations and special interests. Perhaps you can devise a good series of soundbytes and marketing strategies to convince most of the people that you have done everything you can to get their input, but people are getting wiser to and less patient with such tactics. I think you may be better off admitting the limitations of a 60 day comment period, 'scientific' forest management, and 'local collaboration', and working toward re-winning the public trust, with a more democratic national forest planning process. (Individual, New Haven, CT - #A706.14400)

##### **TO ENSURE HONESTY**

One thing you could do is modify your vigorous national public relations campaign so that it's honest and not misleading to the people of this nation who can't look out their window and see, with their own eyes, what "management" in the national forests amounts to (e.g. roads and logging). (Individual, Libby, MT - #A8346.14120)

Being forthright and honest (what a concept!) with all those groups involved with certain areas of the forest should be a big step in the right direction. (Individual, Lopez Island, WA - #A15240.15000)

#### **263. Public Concern: The Forest Service should enhance the public participation process.**

##### **BY ENSURING THAT IT IS OPEN AND COMPREHENSIVE**

As with other Forest Service initiatives and plans, the agency too often inappropriately shrinks the decision space before initial scoping. In line with the language of the 2000 revision to the NFMA forest planning rules, improved public involvement includes more discussion of the issues with the public in various forums prior to a formalistic scoping document released for public comment.

If nothing else, the agency needs to use a more comprehensive, open and transparent public involvement process than it used in promulgation of the January 2001 rule the District Court of Idaho felt compelled to enjoin. (Business or Association, Washington, DC - #A17887.15150)

#### **BY ADEQUATELY PUBLICIZING PROPOSED ACTIONS AND OPPORTUNITIES TO COMMENT**

Improve communication with communities, and forest user groups, that are directly affected by Forest Service actions. I am most upset when closures, or changes, are made in my local forest (San Bernardino, Cleveland . . . ) and then to find out that a well funded national activist group had petitioned for these closures months ago. The US Forest Service should provide better local notification of planned meetings, or when public comments are requested for local forest management planning. California Prop. 65 required using hazardous chemicals to print in the local paper large vicinity maps and descriptions of operations. Why can't the Forest Service do the same thing for proposed changes? (Individual, Irvine, CA - #A937.14100)

Although the Forest Service does make attempts to solicit input from the public, these attempts are not well publicized. Local administrators should try harder to solicit local opinion regarding land use issues. This should include the use of local newspapers to publicize these issues, provide means of gathering public input, and provide notice of public meetings concerning land use issues. (Individual, Saint Louis, MO - #A629.14100)

"Hearings should be held in areas most effected by your regulations. In addition, you should inform all of those that own land within a 50 mile radius of all potential land that is being considered for any new designation, to be given a thorough explanation of your intentions in specific language (without 'legalese') so the average person can understand the path you are considering and why you are considering it. I know you will inform Native American Groups, the Sierra Club, etc., of your intentions since these groups seem to be more important to you than 'regular citizens' but you can do a better job letting the rest of us know what your intentions are, and how you intend to achieve them." (Individual, No Address - #A834.14100)

A better effort should be made to publicize this opportunity. (Individual, Arlington, MA - #A1152.14120)

We have precious little left of our natural resources to protect as a direct result of the public being left in the dark while laws designed to benefit special interest groups have been passed without the public's awareness. This has to stop. This is our land and we have the right to protect it and to designate how our tax dollars are spent in the protection and maintenance of our priceless and irreplaceable natural resources. (Individual, Monroe, GA - #A4875.15000)

#### **BY UTILIZING MASS MEDIA**

Involve all interested parties in the process adequate opportunities to offer their views and help to define the issue. The Forest Service should hold public hearings and entertain written comments during the planning process for the individual roadless areas. Notice by the Forest Service should include notification not only by print media, but [also] by mass media that includes local radio and TV stations. Public Service Announcements and/or News Bulletins should be used. All of the public should be given ample opportunity to be informed that planning for management and use of nearby roadless areas is taking place and will affect the future of these National Forest areas. (Individual, Edgewood, NM - #A5638.15150)

The impact of the roadless rule must be made known to the entire public by better use of the news media. As it is now, you are only getting feedback from a small percentage of the public that learned about it, or initiated it, as part of a special interest group like the Sierra Club. The majority of the public does not know that this rule is being reviewed right now or how the result will impact their lives. (Individual, Fountain Hills, AZ - #A5990.14000)

**BY ACCEPTING INPUT THROUGH ALL MEDIUMS OF COMMUNICATION**

Accept input via any and all methods. Some individuals communicate better through particular means than do others. Each person's voice should be heard. In particular, those parties who are not outspoken in their communities, due to personality, or simply being outnumbered, such as in a situation where most of their neighbors and friends work in the timber industry), will not be heard via a town meeting type of format. (Individual, No Address - #A1702.15100)

**BY USING AN INFORMAL METHOD OF COMMUNICATION**

[Question 2] Working Together: Informal communications rather than structured communications provide better information to the local officials (Forest Supervisor) and reduce the cost. (Individual, No Address - #A16447.14120)

**BY ADEQUATELY SOLICITING PUBLIC INVOLVEMENT**

The Forest Service under Chief Dombek did a wonderful job of soliciting public comment on the Roadless Rule last year. I was pleased to testify in support of it, as did 95% of the people who attended the hearing in New Hampshire that I did. In fact, the only ones who did not support the rule were the local politicians and the timber companies. Is the Forest Service going to conduct an equally extensive solicitation of public comments for the current attempt to reverse the Clinton roadless rule? Or are they going to try to do a dirty, back room deal between lawyers in the same way as the dealings between the so-called Justice Department and the snowmobile manufacturers in order to reverse the Yellowstone snowmobile ban? (Individual, Portland, ME - #A1461.14000)

How do you know that environmentalists won't flood your office and E-mail with responses and drown out "real" people (like me) and the voting public? You do need new and varied public comment. (Individual, San Diego, CA - #A1614.14000)

It is difficult to keep the entire public involved at every stage of decision-making but all attempts to do so should be made. Public meetings, solicitation of commentary and even referendum are methods of maintaining that kind of involvement. It is my firm belief that commentary and even referendum are methods of maintaining that kind of involvement. It is my firm belief that the citizenry will help promote good decision-making if they get the chance to remain involved and are listened to. So often though, interests that hold economic values above those moral [values] see to it that the public is not fully informed or involved in this crucial kind of decision-making. (Individual, No Address - #A1728.14000)

**BY USING SURVEYS TO SOLICIT PUBLIC COMMENT**

We feel the Forest Service should take advantage of objective survey methodology to better gauge public opinions. Our experiences with such surveys have been extremely beneficial. Survey results often are much different than comments from public meetings and help our agency to objectively manage wildlife resources, habitat, and competing uses. (State Agency, Social Circle, GA - #A22054.14120)

You have meetings in the evening after the working class has worked all day! They stay home with their family or friends, not out of FS meetings; Mostly local people believe that their voice does not matter, does it? Send out a mail survey to local P.O. Box holders! (Individual, Bethel, MN - #A19708.14100)

**BY CONDUCTING NATIONWIDE POLLING**

Public hearings are often not the best forum for public input. However, where the Forest Service is developing national policy it is impossible for the taxpayers in New Jersey to sit down with loggers from Libby in a meeting room every week. Nor is it appropriate to assemble a group of "stakeholders" in some far flung rural community to dictate the goals for a forest supported by the American people as a whole. The Forest Service is a trustee of these lands, and as trustee has a responsibility to see that its lands are managed properly. The only way that the Forest Service can ascertain whether it is doing the job it has been asked to do is polling the American people in general. Tools may be available, such as the Internet, for the Forest Service to facilitate a "discussion" of ideas on a national basis. The question

remains whether the outcome will differ under such a scenario than what has already been stated to the Forest Service in the first round of comments. (Individual, Bozeman, MT - #A17508.14200)

**BY USING SIMPLE ENGLISH RATHER THAN AGENCY JARGON**

The Forest Service planning process, including the process for the protection and management of inventoried Roadless areas is not very user-friendly. Agency personnel rely heavily upon the use of jargon and acronyms that are unfamiliar to all but those who make a career out of forest planning. (Organization, Maryville, TN - #A8754.14100)

Please refrain from using words like “collaborative effort” and “consensus groups”, etc. A meeting is a meeting—call it that. Use simple English to communicate with the public. (Individual, Libby, MT - #A10531.14120)

**BY GIVING DUE CONSIDERATION TO ALL RELEVANT INFORMATION AND PERSPECTIVES**

I believe that the key to a collaborative relationship is valuing a variety of perspectives and respecting the validity of opinions that differ from the perceived goals of the Forest Service. Too often Federal agencies have planning sessions with public and private partners in which it appears that the goal is convincing the partners to agree to an agency goal rather than to improve the plan by giving due consideration to all relevant information. (Individual, Atlanta, GA - #A873.15162)

**BY EMULATING THE BUREAU OF LAND MANAGEMENT**

The best thing about this public comment process that I am participating in is that I can e-mail it in and it will be visible to anybody who wants to read it. I am just like the redneck grandstanding in a public meeting. I say my privately arrived at piece and he says his and there is hardly a chance for us to come together on the issue. The BLM seems to be better at canvassing the public will. See how they do it. (Individual, No Address - #A22183.15165)

**BY EMULATING THE WHITE MOUNTAIN NATIONAL FOREST**

The system of public involvement processes that the White Mountain National Forest is using for its plan revision is a good example of how a local public involvement process should work. (State Agency, Concord, NH - #A28779.14000)

**BY REQUIRING PARTICIPANTS TO INTERACT**

But for future forest planning, I like processes where people are randomly seated around tables, are provided with good information, and have to interact with each other to come up with ideas. Public hearings that allow people to grandstand can be polarizing and counterproductive. (Individual, Northfield, MN - #A22395.14200)

**264. Public Concern: The Forest Service should not confuse the large number of public meetings held and letters received for the Roadless Area Conservation Rule as quality public involvement.**

**AS MANDATED BY THE NATIONAL ENVIRONMENTAL POLICY ACT**

Fundamentally, the state of Utah believes that the rulemaking is outside the bounds of authorizing legislation, and is outside the bounds of any definition of a proper and reasonable public process. The state understands that the previous administration, and many citizens, have loudly proclaimed that the process to prepare and evaluate the Roadless Area Conservation Rule was, once revealed, very open and “public,” and therefore complied with the requirements of the National Environmental Policy Act. The Department, under the previous Administration, certainly arranged for a lot of meetings the public could attend, and allowed for written comment by the public. Unfortunately, many of those meetings in Utah, and I am told those held elsewhere, provided little or no substantive information to the public which attended. The state believes that the information presented, the manner of its presentation, the lack of localized examinations, and other factors, requires the Department, under the current administration, to find that the process did not meet the standards of the “hard look” required by NEPA. The [state] believes the process is not valid, and must not be given any further consideration, or must be

significantly reworked in order to achieve compliance with NEPA and Forest Service organized legislation. The Department must not confuse the large quantity of public meetings held on this proposal, or the large number of letters submitted, for quality analysis and adherence to law. (State Agency, Salt Lake City, UT - #A20742.20203)

**265. Public Concern: The Forest Service should recognize that public involvement efforts for the Roadless Area Conservation Rule were more than adequate.**

The U.S. Forest Service conducted a fair and open public process, including 34 meetings or hearings in Montana communities. Public debate was open, healthy and vigorous. Newspapers and press were full of roadless news, public hearing schedules, editorials, columns and letters-to-the-editor.

In contrast to this (ANPR) process—with no hearings to date—scoping for the roadless rule began with public hearings on every national forest in Montana between November and December 1999. This process could be viewed as a continuation of [the] public involvement . . . process used to develop the interim rule in 1998.

After the draft EIS was published in May 1999, a second round of public meetings, open houses with opportunities to discuss and comment on the draft, were sponsored on every national forest and many smaller communities throughout Montana.

Finally, public involvement in the proposed national forest roadless conservation policy reached its peak in June 2000, when 15 additional public hearings were conducted in 10 Montana communities.

The process used to develop the roadless rule—through open public meetings—was a model of public involvement. Leave the rule. Move forward, not backwards. (Organization, Helena, MT - #A21370.10153)

Since BREDL was founded we have advocated that governing bodies listen to legitimate public concerns. In our 17-year history we have encountered numerous situations where the public was shut out. However, this is not one of those occasions. On the contrary, the Forest Service went through the legal, fair and open process in gathering public comments. We commend the Forest Service in providing ample notice and opportunity for the public to comment. Over 600 public hearings were held nationwide including at least one in every national forest. No other federal agency has gone to such positive lengths in providing information and gathering public comments. In the future, we can only hope that all drafts of important rules from all agencies utilize the process as effectively as the Forest Service did during the Roadless Area Conservation Rule process which ended in January 2001. (Organization, Roanoke, VA - #A10565.10153)

Assertion: decisions about roadless areas should result from an open and fair process and address concerns (pp. 3 and 4). In fact, the ANPR contains no basis whatsoever for assuming that the Roadless Rule process was not open and fair, and fully responsive to concerns. The ANPR does quote at some length from the District Court's opinion in Kootenai Tribe, et al v. Veneman to the effect that the comment period was "grossly inadequate" (p. 5). The errors in that opinion are too manifest to ignore, however. The opinion faults the DEIS process for an absence of maps, too little comment time, inadequate public meetings, and lack of response to public comments. In fact, as the agency well knows, the DEIS provided maps of roadless areas (except some small ones it later dropped from its proposal), and it allowed 69 days for comment rather than the legally required 45. Moreover, the agency nationwide held hundreds of public meetings, and prepared an entire volume of responses to comments, volume 3 of the FEIS. The opinion, in attacking the DEIS process, confuses it with the scoping stage 6 months earlier, for which there is no legal requirement of public meetings or responses to comments, repeatedly citing as evidence of perceived DEIS process flaws testimony that dealt only with the scoping phase. Had the Forest Service defended itself against this lawsuit even perfunctorily, it would have had the opportunity—as well as the obligation—to correct these factual errors in court. Having declined to do so, it is hardly in a position to rely on the judge's misapprehension here. (Organization, Olympia, WA - #A20145.10155)

**266. Public Concern: The Forest Service should recognize that the public involvement process under the National Environmental Policy Act is biased in favor of local interests.**

The NEPA process, which has been used extensively in national forest planning, is usually biased in favor of local interests due to the choice of public involvement media. By allowing important decisions regarding roadless status and associated values to be made locally on a case basis, there is limited opportunity for broader national concerns over conservation, protection for future generations, biodiversity, water quality etc, to be articulated. People who live far from a given forest are shut out of the process. The Forest Service needs to awaken to the fact that these are National Forests, and as such, requires broad, national public involvement for important issues like roadless area integrity. (Individual, Lacey, WA - #A17998.15100)

*Adequacy/Availability of Information*

**267. Public Concern: The Forest Service should adequately notify the public of pending management proposals.**

**NOTIFY PEOPLE ON ITS MAILING LIST OF PENDING MANAGEMENT PROPOSALS**

Only by chance did I read in a July, 2001 newspaper about the Forest Service (FS) renewed request for comments on roadless areas long after the final rule of Jan 12, 2001 was issued. This demonstrates a problem in the rulemaking process. A National Forest user such as myself, in the FS files, is not informed of proposed rules except through the Federal Register. I do not get the Federal Register, I do not have time to wade through that voluminous publication for pertinent proposals, and I do not belong to any organization that would inform me of comment periods for such proposals. I regularly receive mailings from the BLM warning of upcoming deadlines for paperwork. Why can't I also receive from the FS or BLM warnings about pertinent Federal Register proposals? At least extend comment periods for significant proposals to many months. (Individual, Leamington, UT - #A8030.15150)

**MAINTAIN A CURRENT MAILING LIST**

Many of the decisions that were made by the local forest planning management of inventoried roadless areas were made to satisfy the pressure from the powerful environmental groups. Let us hope that this is not a repeat performance. This includes a current mailing list. For some unknown reason there were some of us who were dropped from the mailing list. This presents the problem of not being aware of the changes they are undertaking. They now plan 4 miles of new road in the Kinky Creek area and the first I knew of it was when I read it in the newspaper. It is hard to convince many that I have talked to that this was not intentionally done. When things like this happen it makes it very difficult to have any faith in the management of our forest. (Individual, Rock Springs, WY - #A5695.12200)

**NOTIFY STUDENTS THROUGH UNIVERSITY CONTACTS OR RANGERS**

We are a group of concerned students from James Madison University located in Harrisonburg, VA. We were shocked to hear that approximately 2.6% of the United States land base was about to be auctioned off to industry. We couldn't believe that such an important issue had been unknown by a vast majority of JMU students. We then contacted other students from across the country asking them about this proposed policy change. Not one student was aware of such a proposal. The Forest Service should consider broadening the ways of public announcement. Ways of reaching out to students would be contacting universities, public broadcasts, or local speeches by park rangers in the area. (Individual, No Address - #A30028.14120)

**POST ALL INFORMATION ON LOCAL AND NATIONAL WEB SITES, INCLUDING OPPORTUNITIES TO RESPOND**

USFS should post all information on local and national web sites. (Organization, Reno, NV - #A8730.14120)

Design a web site in order to allow everyone to post their comments instantly by subject; match and search similar recommendations and comments from all comments submitted from everyone in order to verify a proper accounting of how many Americans support a particular solution. (Individual, Jefferson, OR - #A775.14130)

Perhaps it is possible, but I could not find a way to respond to your questions via your website. My impression was you are soliciting public opinion for YET MORE STUDY on opening wilderness areas to “mis”management. If my impression is correct, I find it very hard to believe you wouldn’t make it easier for the public to comment, i.e., put the questions on your website with a link for people to respond directly to a question as they read it. Why wouldn’t you take advantage of technology to help guide policy making in this area? (Individual, No Address - #A5196.14130)

#### **ENSURE THAT THE RESPONDING EMAIL ADDRESS WORKS**

I am glad to see that the President has reopened comment on the USFS’s roadless proposal. I sent comment to the USFS during the previous comment period, but my comments were returned as undeliverable. I rechecked the E-Mail address and it was correct as advised. I wonder how many others were rejected. (Individual, Stayton, OR - #A1042.14130)

I could not get your e-mail to work so I am faxing the reply! (Individual, Reno, NV - #A1184.14130)

### **268. Public Concern: The Forest Service should address the biased and inadequate information on the roadless area homepage.**

Further biased material is found through the link to “Summary of Key Information” on your roadless area homepage. The link leads to a document entitled “Appendix B—State-by-State Summaries of Key Information,” which is a table. I comment here on this table as it relates to Alaska, since that is the part of the national forest system that I know best.

One column of the table lists “Percent of NFS land that is Inventoried Roadless Area.” For Alaska, the percentage is 66.9 percent. This is an absolutely meaningless figure in regard to logging, and is extremely misleading to members of the public that rely on this table in preparing comments (or forming opinions) on the proposed changes to the rule. The vast majority of this 66.9 percent of the Tongass and Chugach National Forests is land that is unforested or is covered with forest that has no commercial value!

The next column is “Estimated Reduction in annual Harvest from Inventoried Roadless Areas.” In fact, this figure has little meaning from an economic perspective. What would have been meaningful in its place would be the annual amount of timber that could be obtained with inventoried roadless areas removed from the timber base.

A further problem with the table is its last column, which purports to show “Potentially Affected Areas.” In the case of Alaska, these “areas” are all communities. The implication is that these communities would be affected by the reduction in number of jobs shown in the adjacent column and by the reduction on timber yield from roadless areas as shown in the other column. In fact, most [if] not all of these communities would benefit in the long term from protection of roadless areas. For example, Metlakatla has opposed the project (now for a ROD) in the roadless area on Gravina Island, which the people of Metlakatla rely upon for subsistence resources. Hoonah and Klawock have had their watersheds and viewsheds logged by Native corporations as well as the forest Service, and protecting federal roadless areas near these communities will provide the highest long term benefit. In summary, the Forest Service appears to have done everything it possibly can in this process to skew the results of public comment to be those which the Bush administration desires. I am flabbergasted by this blatant tinkering with the ballot box (as it were) of the public process, although after the shenanigans in Florida in the presidential election what else should I have expected? Nonetheless, I’m mad as hell about how this so-called public process is being conducted. (Individual, Sitka, AK - #A24495.14130)

**269. Public Concern: The Forest Service should establish consistent terminology and reporting procedures for advance notices.**

RACR should establish a common terminology and reporting procedure so advance notices in Quarterly Reports and NEPA documents fully explains when and why activities are proposed in Roadless Areas. . . there is a history of inadequate and divergent approaches to public information sharing in proposed action in Roadless Areas. (Organization, Boise, ID - #A20363.14120)

**270. Public Concern: The Forest Service should provide site-specific information.**

**TO ALLOW INFORMED COMMENT**

The proposed rule set prohibitions on construction and reconstruction of roads, but **did not propose to prohibit timber harvest in the regulated areas**. The proposed rule also **deferred consideration of including the Tongass National Forest**. The public was not given the appropriate opportunity to comment how a timber harvest prohibition would affect them or their local area. The Forest Service has claimed that the public had ample opportunity to comment on the possibility of a prohibited timber harvest because it was generally discussed in the Draft EIS. 66 *Fed. Reg.* 3257. However, the Draft EIS listed several timber harvesting prohibition alternatives and did not adequately analyze the environmental and social impacts of those alternatives on each individual unit of roadless area identified by the proposed rule. **Due to the existence of several alternatives, the lack of insufficient analysis, and a severely limited comment period, the public in fact, did not have ample opportunity to adequately comment on the possibility of a prohibited timber harvest.**

On November 17, 2000, the Forest Service announced the availability of the Final EIS. Like the Draft EIS, the Final EIS did not adequately analyze the impacts of the proposed rule on each individual Roadless forest unit as required by NEPA. The analysis instead, was very broad and general. **The Final EIS also encompassed 58.5 million acres of land - a substantial increase of 4.2 million acres over the amount addressed by the Draft EIS.** For example, large chunks of land were added to the Final EIS in areas such as the Chugach National Forest in Alaska (1.9 million additional acres) and in the Tongass National Forest in Alaska (860,000 additional acres). **The public was not notified that these areas could be included in the final analysis and therefore were never afforded an opportunity to comment.** (Business or Association, Washington, DC - #A28689.10135)

Decisions relative to the designation of roadless areas cannot be made in a vacuum. Rather, access to information such as whether a specific area has been inventoried for both classified and unclassified roads is critical in reaching a consensus and the appropriate policy. This information must be made available to the general public in order that a consultative process among various interests parties can be undertaken prior to a final decision on whether a particular area should be designated as Roadless. A basic tenet of our democratic process is information to its citizens. Those entrusted with government have a responsibility to ensure that such information is widely disseminated so that an informed citizenry can make informed decisions. (Organization, Huntsville, AL - #A13542.14100)

**SHOWING THE RELATIVE IMPORTANCE OF SPECIFIC ROADLESS AREAS**

I believe that the IRAs on each National Forest should also be displayed as to their relative importance and value from a Statewide (FS), Regional (FS) and National (FS) perspective (i.e., higher or lower than average number of acres of roadless areas) so people can grasp the importance of the IRAs on the Forest they live on or adjacent to, or are concerned about. (Individual, Libby, MT - #A2301.45100)

**271. Public Concern: The Forest Service should not use the Federal Register to announce comment periods.**

Why the Federal Register? Hardly anyone reads it. Was this an effort to hide this issue or what? Fortunately, the media do check this out and let us know. (Individual, Stevensville, MT - #A779.14110)

## Adequacy of Public Meetings

### 272. Public Concern: The Forest Service should conduct public meetings.

Keep the doors of communication open and encourage public involvement through meetings. (Individual, No Address - #A583.14200)

Open public meetings go a long way to insure all get heard and also help to understand other's viewpoints. (Individual, Olympia, WA - #A615.14200)

The Forest Service has never worked effectively with individuals and groups with strongly competing views. However, more public hearings where the Forest Service personnel actually listen to the people in attendance would be a first step toward effectively working with individuals and groups. Listen to the arguments, add good science and make good decisions based on that good science. (Individual, Miami, AZ - #A880.14200)

#### THAT ARE LEGITIMATE

The best way to involve all parties in the process would be for the FS to simply hold legitimate public hearings before any decisions are made that would impact the recreational public. . . In the formation of the original rule meetings were held, but the public perception of these hearings was that the FS was just "going through the motions" in fact, barely tolerating the motions based on the meetings I attended, with the outcome having already been determined. It is essential that the stakeholders in forest use policy decisions be fully involved in the formation of those decisions and that the agency try to rebuild the trust with the recreational public that has been lost due to this debacle. (Individual, Denver, CO - #A5433.14200)

#### THAT COMPLY WITH FEDERAL RULES

The Meetings that were held on this matter were not in compliance with any Federal rules, as we know them. Staggering of meetings for information and written comments and the actual public hearings is offensive if not illegal. Many people here in Nevada have to drive over 100 miles just to attend. I attended the hearing in Austin on 6/13 and heard many participants ask questions that went unanswered followed with a comment that information was given out at the earlier meeting and that that meeting was reserved for a three minute testimony. The three-minute rule was another slap in the face for 1 gentleman that indicated that he had to drive for 2 hours to speak for 3 minutes. (Individual, Austin, NV - #A15794.14200)

#### IN A FAIR AND IMPARTIAL MANNER

The best way for the USFS to work with States, tribes, local communities and other organizations and individuals is to listen to, and take into account, their views and uses. The USFS should stop dividing the meetings into splinter groups where different subjects are discussed. This only causes distrust of the USFS and casts doubt as to the value of the public meeting process. (Individual, Mount Hood Parkdale, OR - #A1084.14200)

If the Department of Agriculture chooses to propose revisions to the roadless area conservation rule, we advocate including additional hearings in the vicinity of each Forest supervisor's Office, Region Office and Washington Office. These hearings should be conducted in a fair and open manner to assure that representatives of states, tribes, local communities, other organizations, as well as individuals will be heard. (Civic Group, Roanoke, VA - #A1713.14200)

#### AT CONVENIENT TIMES AND PLACES

The best way for the US Forest Service to work with states, tribes and local communities is to initiate and maintain a continuing dialogue with a broad section of individuals representing the above mentioned groups. It is important that any and all meetings be held at a TIME and PLACE convenient for all individuals to attend and participate. Any meeting notification should be done far enough in advance to allow for proper planning and attendance by those groups. Local Foresters should use Friends of the

Forest Groups as much as possible and communicate directly with groups that presently have access to and a high level of interest in the forest. Those groups should include but not be limited to: snowmobile clubs, camping clubs, timber related organizations, fishing groups, bird watchers, hiking groups, biking groups, horseback riding groups, etc. (Business, Haslett, MI - #A4861.14200)

#### WITH ADEQUATE NOTICE

I have read where there were 600 public hearings and 1.6 million comments in which 90% of the people said they wanted to preserve the National Forest Roadless Areas. I don't know when or where these hearings were held because I never heard of them. Evidently they were by invitation only and strictly partisan. (Individual, Rydal, GA - #A5408.10132)

Although many public meetings were held, they were often announced last minute and there was little time to prepare comments, particularly specific comments as there was little specific information. (Individual, Coeur d'Alene, ID - #A7914.14100)

#### THAT DISCUSS LOCAL AREAS OF CONCERN

[Question 2] Public hearings that discuss localized areas of concern and not forest wide proposals. (Elected Official, Sanpete County, UT - #A15546.14200)

#### THAT DISCUSS POSSIBLE MODIFICATIONS TO THE ROADLESS AREA CONSERVATION RULE

I would urge that the Rocky Mountain Region of the Forest Service convene a public hearing regarding possible modifications of the roadless rule sometime before the end of the public comment period on September 10, 2001. Given the importance of this rule and the ramifications of possible modifications, it is essential that the Forest Service provide an opportunity for the public to express its views in much the same way that it was provided at the time of its initial development. (United States Representative, Colorado - #A21467.14000)

#### INSTEAD OF SOLICITING ONLY WRITTEN COMMENTS

Through public, open meetings such as those previously held for the Roadless Rule. Do not use the instant approach (a single written comment period) to justify adulterating the roadless rule or other policies of national interest. (Individual, West Glacier, MT - #A5946.14000)

### **273. Public Concern: The Forest Service should conduct as many public meetings for the Advance Notice of Proposed Rulemaking as were conducted for the Roadless Area Conservation Rule.**

In this current ANPR process the Forest Service has asked the public for responses to ten questions. We question the validity of this approach. The public may not have the information or background to make informed responses to open-ended questions. This weights the process towards industry and local government (which is often dominated by business interests). The proper procedure would be to present the public with a proposal and ask the public to comment, providing the maximum opportunity for them to do so. This is precisely what the Forest Service did under former chief Mike Dombeck during the Roadless Area Conservation Rule public process. If the current Forest Service leadership wishes to make changes to the Rule, they should initiate a complete public process with at least as many hearings as were conducted to formulate the rule. (Organization, Sitka, AK - #A12003.11100)

### **274. Public Concern: The Forest Service should conduct fewer, more productive public meetings.**

Working with local communities, organized groups, states, tribes and individuals is desirable. However, our experience has been that current FS processes are too long and tedious for many citizens to endure. Organizations with paid staff for such purposes tend to be the ones that most influence the process. Fewer, more productive meetings with a wider representation of forest users are needed. (State Agency, Social Circle, GA - #A22054.14200)

**275. Public Concern: The Forest Service should improve the way forest personnel conduct public meetings.****ENSURE THAT PERSONNEL ARE WELL INFORMED REGARDING PROPOSED ACTIONS**

I was amazed when I went to the public hearings last year in Kalispell, MT and the officials could not even tell us which specific areas would be included in the 60 million acres to be put under lock and key. I've already seen too much of Montana's National Forest area gated off over the last decade. (Individual, Kalispell, MT - #A1700.14200)

**ENSURE THAT PERSONNEL USE UNBIASED LANGUAGE**

"Do you want clean water? Do you want clean air?" This is how the Forest Service started the public comment periods here. Well who doesn't want clean water and air. But they implied that if the roadless rules didn't go through as presented, that was the outcome to America. The Forest Service personnel were so biased and arrogant it surprised me. But then they must have figured the administration had this one in the bag. The presenters even implied that more area could be included than was proposed. It seemed the Forest Service at that time wasn't interested in managing the resources but would like to see the National Forests as big parks. (Individual, Port Angeles, WA - #A30310.10135)

**276. Public Concern: The Forest Service should improve citizen participation in public meetings.****ENSURE THAT LOCAL CITIZENS ARE ADEQUATELY REPRESENTED AT MEETINGS**

The forest service should make sure that all voices are listened to. Most meetings are attended by very few people. Environmental groups bus in people to overwhelm the local voices. Many local citizens don't hear about them and if they do they don't understand the impact of decisions that concern them. Make sure all meetings are well attended. If the locals are not represented, don't hold the meeting until they are! (Individual, Olympia, WA - #A444.14120)

**ELIMINATE BRIBED ATTENDANCE AT MEETINGS**

During the initial roadless meetings/hearings a number of local green groups paid college students and other young people to attend. This is not fair. In talking with some of those young people I discovered that they had never been in any of the disputed areas in our state! I believe the Forest Service can eliminate bribed attendance by asking if a participant received money to attend and to ask what areas their comments pertain to. (Individual, Palmer Lake, CO - #A23361.12230)

**ALLOW ADEQUATE SPEAKING TIME AT MEETINGS**

We had 3 minutes to speak at the initial roadless meetings—this was not enough. I would say 10 minutes minimum is needed. (Individual, Fraser, CO - #A30203.15152)

**277. Public Concern: The Forest Service should conduct meetings on the model of those held by the Sequoia and Kings Canyon National Parks**

Consider the format of the excellent public-input gathering meetings that were held not too long ago by SEKI (Sequoia and Kings Canyon NPs) on their (ongoing) WMP (wilderness management plan): these meetings were by far the best in my experience. (Unless I felt assured of similar arrangements, I would be reluctant to make much effort to attend a meeting where my questions or input might be curtailed).

SEKI mailed out information about the purpose and nature of these meetings in advance. They opened with a brief slide show and presentation. They took audience questions without limitation, and because of their good prior presentations, and because questions could be asked of agency personnel during the remainder of the meeting, this public question period "self-limited" in a reasonable period of time.

Then public input was gathered as follows: some bulletin boards had been set up around the hall, each labeled with a generalized "issues category" such as, "Trails, Signs and Bridges", "Fires", "Desired Wilderness Conditions", "Solitude v. Free Access", "Permits and Reservations", "Bears and Food Storage", "Group Size", "Camping/Campsites", "Wastes/Sanitation", "Administrative Methods/Minimum Tool Concept", "Meadow and Streambank Management and Stock Use",

“Commercial Users/Permitting”, etc., an “Other Issues” board might have been useful as well. Paper and pencils were provided and all were invited to write down their suggestions and comments on any topics they wished, and pin these up under appropriate category headings (signed or unsigned).

Everyone could read all posted comments and make additional comments/proposals/counter proposals.

This continued until everyone felt satisfied, people being free to leave at any point, since the only remaining agency action was to take down all the comments and file them for subsequent processing.

This method admirably avoided heated argumentation and aggressive people monopolizing the debate. No one ended up having to leave with the feeling they had not been given a fair chance to participate as fully as they wished. Nor did the meeting last inordinately long, public participation had voluntarily concluded within four hours of the meeting’s scheduled start. (Individual, Bishop, CA - #A20954.14200)

### **278. Public Concern: The Forest Service should televise public meetings.**

Keep up the democratic process used in decision-making. Televise hearings for local and cable channels. (Individual, Woods Hole, MA - #A12805.14120)

### **279. Public Concern: The Forest Service should conduct day-long workshops.**

The best way to get input may be to have day-long workshops (Saturday) in local communities, where people can provide input on the roadless areas that they are familiar with. May be good to have a set of questions/issues/information to be addressed for each one (current use, suitable timber, wildlife habitat, wilderness attributes, unique features etc). . . Again, have whole day work sessions to individually discuss the roadless areas around the local communities. Discuss the current situation over the whole Forest (how much is open to motorized use, how much isn’t, past and current levels of timber harvest and distribution of capable/suitable acres) so that everyone gets an idea of the big picture. (Individual, Iona, ID - #A13529.14120)

### **280. Public Concern: The Forest Service should hold a national public convention.**

Hold a national public convention. (Individual, Elko, NV - #A3656.14200)

## *Adequacy of Comment Period*

### **281. Public Concern: The Forest Service should allow an adequate comment period.**

This comment period is even more bogus than the first comment period. In our area, (potentially one of the areas most affected by the roadless rule), there was virtually no notification that the comment period was even going on. Then when the Forest Service responded to our questions they sent a form so confusing that very few people would even try to respond to it. This of course leads many of us to believe this comment period is set up to achieve a forgone conclusion. (Individual, Kalispell, MT - #A19138.14100)

#### **TO ENSURE A FAIR AND OPEN PROCESS**

[Question 2] Allow an adequate period of time for Americans to submit official comments on the roadless area plan. (Individual, Arvada, CO - #A17160.14300)

### **282. Public Concern: The Forest Service should extend the comment period.**

#### **TO 90 DAYS**

We advocate that any revisiting of the roadless area conservation rule allow for a 90-day comment period to assure adequate time for the Forest Service to develop needed information, schedule meetings, and give all interested members of the public sufficient time to comment. (Civic Group, Roanoke, VA - #A1713.45100)

**TO 120 DAYS**

Due to the lack of proper awareness of what questions are to be commented on, as the Chairman of the Montgomery County Advisory Committee with the approval of the committee, I am asking for an extension of 60 days. This is to get the information where it is understandable to the citizens of Montgomery County where they can comment. (Association, Sims, AR - #A3086.14310)

**TO 180 DAYS**

The comment period of 60 days is totally inadequate and unfair to the American public. This is a vital issue and the complex nature of this issue is reflected in the "Ten Questions to Help Guide the Decision Process." As an educated and involved American, I feel that I need additional time to formulate appropriate comments.

It is evident that the short comment period is designed to minimize the input of ordinary citizens and favor of the influence of developers, miners, loggers who have preformulated agendas. I heard about this issue today for the first time and the deadline for comments is less than two weeks away. . . . It was reported in the media that the Clinton administration held a comment period of 200 days with public meetings. The Bush administration is giving only 60 days to comment without public meetings. The Bush administration seems to think that public comment on this issue is unimportant or the public is unaware and/or uninterested, and that the short term financial objectives of a few privileged individuals is more important.

I hereby protest this attempt by the Bush administration to silence the voice of actively involved common American citizens in the management of public lands and public resources.

Please extend the comment period to at least 180 days so that I may formulate an informed comment. (Individual, Tampa, FL - #A16478.14310)

**TO 240 DAYS**

Extend comment period by 180 days. Because of the significant size and far reaching implications of this proposal the comment period should be extended to allow for better public education and participation in the process. (Professional Society, No Address - #A27584.14310)

**283. Public Concern: The Forest Service should recognize that extending the comment period would work against the Roadless Area Conservation Rule.**

Perhaps I'm cynical, but I also think that extending the comment period and seeking out people who are critical of any non-extractive use of the NFs is a way of killing the roadless proposal entirely. (Individual, Merrill, WI - #A9014.14320)

**284. Public Concern: The Forest Service should recognize that the comment period for the Roadless Area Conservation Rule was too short.**

The Forest Service recognizes that one of the major concerns with the rule is that the agency did not provide the public adequate time to comment on the proposed action. 66 *Fed. Reg.* 3244, 3248, The Forest Service's response however, is that the comment period was sufficient because it received approximately 1.6 million comments. *Id.* This argument is misleading and deceptive. When important policies are being considered, concerned parties will submit comments no matter how much time is allowed. The fact that over 1 million of these responses were "postcards or other form letters" is likely a product of the unreasonably short comment period, not an indication that the time allowed was adequate. *Id.* Responding to a proposed action by postcard or form letter does not require extensive analysis of the proposed rule and the Draft EIS. A policy that will substantially affect 43 million acres of forestland by effectively halting all major economic activity within those areas requires a substantial period of time for the public to thoroughly analyze and provide meaningful comments. It took the Federal government over a decade to study and analyze the inventoried roadless areas covered by this rule, yet it provided the public a mere 60 days to comment on the proposal. Providing ample opportunity for public comment would not have added such a substantial amount of time to the process as to have any noticeable delay in producing a rule. (Business or Association, Washington, DC - #A28689.10132)

**285. Public Concern: The Forest Service should recognize that an additional comment period would be insufficient to address the deficiencies in the Roadless Area Conservation Rule Final EIS.**

The Idaho litigation specifically took the national roadless regulation process to task for the failure to do a site-specific inventory, to provide accurate maps, or to provide sufficient information and time for the affected interests and state and local governmental entities to comment. *See Kootenai Tribe of Idaho v. Glickman*, No. 01-10, Complaint [sections] 71-72; *Kemphorne v. U.S. Forest Service*, Complaint [sections] 63-66. It is inaccurate to suggest that additional notice and comment will address the legal deficiencies of the FEIS. (Elected Official, McKenzie County, ND - #A27737.10135)

**286. Public Concern: The Forest Service should notify previous respondents to the Roadless Area Conservation Rule of the comment period for the Advance Notice of Proposed Rulemaking.**

We are concerned that the 1.6 million citizens and owners of our National Forests who commented on the RPR have not been contacted about this 60 day comment period. We were not contacted and found out fortuitously because someone sent us a fax about the proposal. (Organization, Bellaire, TX - #A883.14100)

I sincerely hope that the Forest Service remembers to notify all those who previously commented on the so-called Roadless Initiative for our country's national forests.

In the interest of fairness, all those who took the time to comment on this subject should be given the opportunity to make comments on this new and extended effort. There are many of us who are interested in this subject and do not wish to be disenfranchised on the matter. (Individual, No Address - #A1708.14120)

### *Adequacy of Timeframe*

**287. Public Concern: The Forest Service should recognize that the time frame for comment on the Roadless Area Conservation Rule was adequate.**

There was PLENTY of time for public comment during the original planning phase. The George W. Bush administration is WRONG to allow more time to pass and more roads to be built in the meantime. I am very upset that more roads could be built and more forest could be destroyed during this summer while this roadless plan is further debated in congress. I urge you to endorse the Clinton Roadless Area plan!! (Individual, Edmonds, WA - #A495.10154)

This process of asking for public input has been done, a process that took three years (not 60 days) that included all perspectives. The answer from the American people is overwhelmingly to protect our wilderness areas for our future generations and for the good of the earth. (Individual, Walnut Creek, CA - #A579.10154)

It appears that the Forest Service (FS) is attempting to undermine and disenfranchise the comments that have already been submitted. Approximately 600 meetings were held and at least two years of effort went into the RPR. About 95% of the total 1.6 million comments were in favor of protection of more Roadless Areas.

In Texas of the 29,111 Texans who submitted comments 28,718 supported more Roadless Protection while 393 were opposed to Roadless Area Protection. This means that 98.65% of Texans who participated in the RPR supported Roadless Protection while 1.35% were opposed. That is a 73 to 1 margin of support for Roadless Protection. At the two public meetings held in Texas public comments were in favor of Roadless Protection by 2 to 1.

We attended both public meetings that took public comments as well as two public meetings which were informational in nature. Where were the local people that you have said should have more say on this

issue? There were news stories in the papers about the RPR and the public meeting. We believe the local people who really cared were at the meetings and the local people who really cared sent in comments. Any suggestions that there was not enough opportunity for public comment is simply untrue. We believe you are aware of this situation and that you should speak out and tell the truth. (Organization, Bellaire, TX - #A883.10152)

**288. Public Concern: The Forest Service should recognize that the time frame for developing the Roadless Area Conservation Rule was not adequate.**

In the flawed and hurried process used to ramrod the Roadless Initiative through, a major mistake made was the inclusion of nearly three million acres of roaded areas in the policy. This is an indicator of a process so rushed attention to detail got lost in the rubble. It is the same reason that citizens who did attend the public hearings—sometimes with very little notice—did not have their questions answered by Forest Service personnel conducting the meetings. Issues as simple as asking to see maps to determine the actual area covered could not be answered by those in charge. The Forest Service personnel were not trying to be uncooperative. They simply did [not] have in many cases even the most rudimentary information to present to the public. This, in my judgment, cannot be disguised as “public participation.” (Business or Association, Helena, MT - #A17074.14100)

**AS EVIDENCED BY POOR DATA AND NUMEROUS MISTAKES**

[From Attachment 2] Records reveal that poor data and erroneous documents were being developed and used, and mistakes being made as a result of efforts to move the process too quickly in an attempt to finalize the rule-making by the end of the year. A number of letters from Forest and Regional Officers in response to data requests from the Washington Office express concern over the accuracy of their numbers: “numbers less than precise,” “This is an estimate that I hope we are not held accountable for,” “Data derived from forest plans and based on questionable assumptions,” “Some of our management prescriptions do not easily fit in the categories provided.”

A revealing Forest Service letter to the Office for the Federal Register says, “In our haste to get the notice to the Register as quickly as possible, we failed to notice that the document heading was missing.” In a telling internal Forest Service e-mail, dated 6-9-99 from Deputy Chief Jim Furnish to the Chief’s top assistant, Chris Wood, the desire to move quickly is again emphasized, stating: “If we wait until the planning rules are in place and plan revision occur, it will be too late and the quality of the product will be quite varied. If we’re going to look at roadless separate and apart from the roads policy issue, then we should put together a team and address it head on, not indirectly through forest planning. That’s my advice!” (Individual, East Helena, MT - #A20422.10135)

*Use of Science/Best Information Available*

**289. Public Concern: The Forest Service should make decisions based on science.**

Science should guide us all in our decisions but it is up to us to teach the American public how forest ecology operates and then let them make the decisions. Hopefully we will come to a point where the majority of Americans will understand the science and make the right choice for the good of all. Today and in the past, too often economics have dominated our decision making process and we are now at the point where old outdated modes of management are at an end or we will lose parts of our heritage forever.

The Agency should not be the voice of corporations or economics—they should be the source of good, reliable, peer reviewed, and repeatable science. The agency should be where we can turn for unbiased, sound information about the American Public’s Forests. We should be able to trust the agency to tell us the whole truth and let us tell the agency what we then want for our future. The state foresters and Tribal foresters can be part of the science gathering process. (Individual, Cascade, ID - #A4.14500)

Decisions should be made based on sound scientific principles and studies as performed by independent and unbiased groups. (Individual, Saint Louis, MO - #A629.14500)

National Forest lands were designed to be utilized intelligently in ways that will benefit humans, wildlife, and preserve our precious natural resources. Those who counsel complete isolation of these areas in a misguided effort to preserve them in a static, and in their view, pristine condition fail to see their efforts are in vain. Change is inevitable; therefore managed change, based on sound science, is the only logical policy. (Individual, Olivia, TX - #A4334.14500)

#### **RATHER THAN POLITICS**

We feel the FS is basing their decision more on perceived popularity than sound science. The FS needs to allow good science and the multiple-use mandate to significantly affect the roadless area planning process as well as public opinion. (State Agency, Social Circle, GA - #A22054.14500)

#### **RATHER THAN A VOTE**

Forest policy decisions are not about voting. They are about making the right decision for the land in question. The Forest Service as an agency will have to return to its roots and reaffirm itself as a professional management agency, making decisions based upon the best available science and professional judgment. (Business or Association, Coeur d'Alene, ID - #A22058.15169)

#### **BY CONSIDERING THE BENEFITS AND COSTS OF EACH ACTION**

Proposals for the creation of roadless areas or the removal of existing roads must be reviewed in a scientific and economic fashion which considers all benefits and costs associated with each action. This level of review cannot be accomplished through an agency program or Executive Order. (Business or Association, Boise, ID - #A20607.14500)

#### **BY MAKING BETTER USE OF EXISTING INFORMATION**

Better use of existing information is needed. Some present day issues were resolved during unit planning or by research, but people act like they are new. Some people argue that more research is needed, but they ignore existing research because they either don't like the answers or they have not done their homework. (Individual, No Address - #A17292.14100)

#### **BY ACQUIRING SUFFICIENT DATA TO UNDERSTAND THE ISSUES**

In order to have informed decisionmaking, the USDA should have sufficient data to understand the nature of the issues. The western national forests have gone through the management plan process and in some cases have gone through the process more than once. The Gunnison National Forest is currently approaching the revisions to its management plan by beginning to collect data from the public. It would seem that the process for creating the management plans is certainly an excellent model for the Forest Service to follow as a means of working together with communities, states, tribes and other organizations. (Business or Association, Denver, CO - #A29223.15161)

#### **BY VERIFYING THE CONTENT AND VALIDITY OF DATA**

All economic, social and environmental data must be carefully reviewed and verified for content and correctness. Qualified scientific third party data should be used whenever possible in making these important considerations. (Business, Haslett, MI - #A4861.14500)

#### **TO AVOID A ONE-SIZE-FITS-ALL CONCLUSION**

Where is the science? Again and again, in instance after instance, KARE notes that the claims, assumptions and positions taken in this Roadless proposal are not backed up by accurate scientific evidence. WE cannot treat animals, plants, or any aspect of Nature as if they will all respond alike to certain circumstances. The one-size-fits-all look at this situation, the conclusion that all roads are harmful to all species, is an opinion, and the reason there is no scientific evidence to support the conclusion, is that it is unprovable. This lack of scientific backing is a fatal flaw in this Plan, and all the other Forest Service proposals put forth recently. (Organization, Yreka, CA - #A8381.14500)

#### **TO AVOID BIAS IN DECISIONMAKING**

If "roadless" area conservation is to be properly forwarded then I urge the USFS to complete an unbiased study. This has not occurred to date. Get a respected and neutral team of experts, such as the National Academy of Sciences, to complete a science-based study with subsequent recommendations.

Have local and regional community leaders and activists and individuals a part of that process, so that local concerns are addressed and national, impacting a very significant amount of acreage. (Individual, Reno, NV - #A20857.14000)

#### **TO BALANCE ECOSYSTEM STABILITY AND ECONOMIC ACTIVITY**

America faces a quiet crisis of unparalleled proportion, that of the long-term maintenance of its biological heritage. This crisis has arisen because of our failure, both locally and nationally, to manage successfully for economic activity and environmental protection at the same time. If we are to create conservation strategies that truly benefit imperiled species and ecosystems while promoting responsible economic activity, science must become the fundamental foundation for decisionmaking. Scientific consensus on issues of critical national interest should not be treated as a special interest to be negotiated or compromised. (Organization, Washington, DC - #A27037.14500)

### **290. Public Concern: The Forest Service should avoid relying on weak scientific analysis.**

I am most concerned about what I perceive as a recent trend of the Forest Service to rely on weak, incomplete and invalid scientific analysis to support a predetermined policy objective rather than the stated policy of making a complete and objective analysis of the situation and then basing the policy decision on the objective facts. In some cases this includes ignoring published scientific work that is contrary or inconsistent with the desired outcome. Reliance on invalid scientific analysis not only results in bad public policy, it sets a precedent for the use of bad and invalid science that others may exploit in the future and it creates public mistrust in the objectivity of science. In order to avoid this scientifically untenable situation, I recommend the following:

- 1) The Forest Service should rely only on valid scientific analysis using quantitative methods, experimental methods of assessing the impact of roads and the use of control data to determine the statistical significance of the data.
- 2) The Forest Service should use only data obtained by objective sources and exclude studies from groups that have conflicts of interest.
- 3) Each proposed closure must be analyzed on a case-by-case basis because the scientific facts pertaining to the situation will also vary uniquely. The current proposal uses many “one-size-fits-all” responses to perceived problems.
- 4) The results of the study should be interpreted in terms of the impact on the entire ecosystem or range of affected species. Just because you can identify a local effect does not mean that the overall effect will be statistically significant.
- 5) The ability to mitigate any local effects without resorting to closure must also be considered.
- 6) Any proposed changes should have the minimum impact on other mandated uses of the National Forest, including recreation. (Individual, No Address - #A27083.14500)

### **291. Public Concern: The Forest Service should recognize that the best available science regarding individual areas is maintained at the local level.**

Any future rule-making should recognize that the best information regarding individual roadless areas is often maintained at the local level. The previous rule-making was flawed by the need for nationwide consistency in the data employed in the NEPA process. In many instances, this led to use of data that was either outdated, or of such a coarse scale that it masked local and regional impacts that may have otherwise proved unacceptable if exposed to the light of day.

For example, the RACR was constructed using a coarse scale fire regime and condition class assessment that was useful only as an approximation for national strategic planning purposes. This assessment showed that 767,000 acres of roadless areas within Idaho were at medium to high risk of catastrophic fires that would damage ecosystem health. A more refined assessment done by regional personnel, however, suggested that the actual number of acres in Idaho at medium to high risk of catastrophic wildfire was actually greater than 2.5 million acres.

Despite having access to the refined Idaho data the EIS team chose to omit it, since similar data was not available nationwide. In the team's mind, the need for compatibility across data sets outweighed the need to use the best available data. Any future rule-making should recognize, and rely upon, local fine-scale data in determining the proper management regime for each roadless area. (Governor, State of Idaho - #A20141.14500)

**292. Public Concern: The Forest Service should recognize that science does not change with geographic location or political affiliation.**

*They also maintain that environmental analysis and resource management decisions effecting individual national forest should be based on local information and knowledge and the best available science rather than applying one standard uniformly to every inventoried roadless area, no matter the location.*

Local information and knowledge has been supplied in the previous efforts by citizens in over 600 public meetings, by citizens in over 1.5 million written comments, and presumably by Forest Service professionals working within each of the National Forests affected.

Science operates by . . . identifying general processes within these models, and using these processes, sometimes inaccurately as "laws", to make predictions about the systems that are being modeled. The way science is done does not change with respect to geographic location or political affiliation. Unfortunately what is passed off as "science" is often highly biased and misleading. The "Information and science" sentence above implies that the results of science would differ from place to place. If that is the case, then the Forest Service is not dealing with true science. For example, the speed of light in a vacuum is a constant—whether you are a conservative Republican multimillionaire in Texas or an environmentally-aware progressive in Massachusetts who is broke but hopes to make a change on the world that the Lorax would welcome (If you are not familiar with Dr. Seuss' story The Lorax, then go read it now—you should have read it a long time ago).

True science can provide general principles that are designed from the outset to be applied in every system that reasonably approximates the modeled system. I have not reviewed the work done in this matter, so can not comment on its quality. But the language of the sentence means that true science should not be used even if available. That meaning, if inadvertent, is an unfortunate reflection of the state of ignorance regarding science or, if intentional, is deceptive, inaccurate, and underhanded. (Individual, Nederland, CO - #A19016.14500)

**293. Public Concern: The Forest Service should avoid multiple studies on the same research topic or proposed management action.**

**TO ELIMINATE LONG DELAYS**

The decision process should be timely and eliminate the long delays brought about by layer after layer of legal traversing.

Multiple studies on the same research topic or proposed management action must be eliminated. The USFS must become more time constrained, more oriented to actual on-the-ground results. (Business, Libby, MT - #A20686.14400)

**294. Public Concern: The Forest Service should heed the counsel of scientific committees.**

**REVIEW INFORMATION FROM THE UNION OF SCIENTISTS**

Please review information provided by the Union of Concerned Scientists, before accepting so-called science from corporations.

Corporations will say or do almost anything to make a buck. (Individual, Miamisburg, OH - #A208.14500)

**FOLLOW THE RECOMMENDATIONS OF THE COMMITTEE OF SCIENTISTS REGARDING THE PLANNING PROCESS**

The proposed roads prohibition rule is contrary to the recommendations of the Committee of Scientists (COS) in their 1999 Report of the Committee of Scientists. The COS recommendations necessitate an open democratic planning process that includes a broad range of values, uses, products, and services with a high degree of public participation from all stakeholders. The COS recommends that the Regional Forester remain the highest level of decision making with planning efforts oriented strongly to local areas and local issues. In that way, the planning process can mold the plan to the needs and issues of local communities adjacent to or within roadless designations and lists criteria by which roadless designations are precluded if those criteria are met by particular affected communities. How can the Forest Service justify complete rejection of this most recent analysis by such a highly qualified team? (Professional Society, Anchorage, AK - #A21707.13110)

**CONSULT WITH THE UNION OF CONCERNED SCIENTISTS REGARDING THE NEED TO PRESERVE BIODIVERSITY**

Everyone had ample opportunity to comment on the plan, (Unlike your current fast track approach). And now you guys are just going to undue all that work? You're going to just blow the fair, democratic process out of the water and substitute your own foolish, status quo plan? Thanks for spitting in the face of democracy once again. You people disgust me.

The best way to maintain healthy roadless areas is to keep them roadless. Duh! Don't you understand it's time to stop destroying nature and preserve the little of it that is still intact? It is extremely important to all of us, even people like President Bush who just doesn't 'get it'. Bush is wrong, environmentalists are right. One of the greatest mass extinctions in human history is taking place right now. The majority of scientists are in agreement that it is important to save what is left of biodiversity and attempt to improve habitat that has been destroyed or degraded. If you don't believe me, contact the Union of Concerned Scientists. (Individual, Palouse, WA - #A6756.12200)

**295. Public Concern: The Forest Service should provide access to science and research regarding roadless areas.**

The public should have access to the science behind some decisions to allow for open review of the validity of the research and for public education. (Individual, Brimley, MI - #A3659.14100)

**296. Public Concern: The Forest Service should not accept as scientific facts the anecdotes or opinions submitted by the public.**

Throughout the process, user-reported information related to facts that require scientific analysis should be ignored entirely. That is, where concerned individuals or organizations purport to provide scientific "fact" in the form of anecdote or opinion, this information should be disregarded by the forest service, which has its own scientific methods and personnel. (Organization, Denver, CO - #A29624.15110)

**297. Public Concern: The Forest Service should consider "The Roadless Area Initiative: Politics Makes Poor Policy."****BECAUSE IT IS WELL GROUNDED IN FACTS, SCIENCE, AND BREADTH**

I urge the team to give great weight to the input statement by the Forest Service Council, National Federation of Federal Employees under the title "The Roadless Area Initiative: Politics Makes Poor Policy". It seems well grounded in facts and science and breadth, in contrast to statements of advocates from both sides of this controversy.

In sum, I feel the current proposal is too broad in its current form, and urge that it not be adopted. Instead, modify the proposal or continue programs mentioned above. (Individual, Asheville, NC - #A6248.10130)

**298. Public Concern: The Forest Service should scrutinize scientific studies submitted by representatives.**

**TO VALIDATE THE INFORMATION**

If representatives are planning to put forth “scientific studies” to substantiate their views, these studies need to be scrutinized by objective peer review, otherwise they should be considered suspect. (Individual, Holtville, CA - #A8729.14500)

**299. Public Concern: The Forest Service should develop a sense of perspective when evaluating environmental impacts.**

**TO AVOID ARBITRARY AND CAPRICIOUS REASONING BASED ON BIASED SCIENCE**

The lack of defensible and logical reasoning is an indicator of bias. The environmental document evaluations and decision-making must work hard to avoid arbitrary and capricious reasoning based on science with a bias. The Interdisciplinary Team must develop and use an overall sense of magnitude when evaluating positive benefits to the natural environment versus negative impacts to the human environment.

For example, the lack of adequate policy and implementation of fire management practices has led to many catastrophic fires. The sedimentation resulting from these fires is many times that of all OHV activity in the forest. The natural rate of sedimentation is many times that of all OHV activity in the forest. These are examples of the sense of magnitude that must be exercised when evaluating impacts in the document and decision-making. (Organization, Helena, MT - #A13226.14500)

*Adequacy of Public Comment*

**300. Public Concern: The Forest Service should recognize that there was adequate opportunity for public comment on the Roadless Area Conservation Rule.**

More than 600 public hearings were held nationwide on the Roadless Rule, making it the most extensive public involvement process in federal rulemaking history. More than 1.6 million Americans submitted official comments, 95% of which supported strongest possible protections for remaining roadless areas. Ample opportunity was given to tribes, states, communities, and the public to comment on the Rule. Many views and suggestions presented during the public comment period were included in the final rule. (Individual, Edwards, CA - #A4547.10150)

While I only attended the hearings in Eugene, Oregon, it appeared to me that the original process was fair and open. I attended an informational hearing in December of 1999 and gave testimony at a public hearing in June of 2000. The meetings were well publicized and held at a convenient time. I am attaching a copy of my testimony. I find it difficult to believe that the process was not fair and open. Some people who didn't get what they wanted are asking for another [turn] at bat. (Individual, Deadwood, OR - #A881.10152)

The hearing I attended in June 2000 was one of a series of well-publicized hearings where the public (I) was heartily invited to participate. The outreach was so well done that I felt informed about every step of the process. No other USFS request of public input has reached me as did the roadless comment period. I applaud the outreach efforts of the USFS and the work involved in hosting 600 public hearings. My experience of the process makes the allegation that there was inadequate opportunity for public review and comment on the roadless rule (Federal Register Advance Notice web page 2) laughable. It was the most public invitation to comment that I have experienced in my lifetime.

I am both saddened and insulted that after this highly visible comment I have to again express my views on a rule that should have taken effect on March 12, 2001. The public participated in the process in incredible numbers as evidenced by the receipt of 1.6 million comments. It is as if the 95% of the 1.6

million comments gathered in support of the January 12 policy are not to your liking and should be disregarded in this new review process that is far less public than the initial process. (Individual, Portland, OR - #A3713.10152)

The 1.6 million public comments already collected in support of strong protection for roadless areas is evidence that the public has already been given ample opportunity for the forest service to hear their concerns. The abundance of public meetings and other opportunities to become informed of the proposal already appears to have secured a fair and open process. If the forest service delays and modifies the roadless area conservation rule, which was widely supported by the American public, the forest service is in danger of imparting the sense that the process has been neither fair nor open. (Organization, Missoula, MT - #A613.10152)

After a record of 600 public hearings and an unprecedented 1.6 million comments, in which 90 percent of the people said they wanted to preserve the national forest's roadless areas, you want to know what people think about preserving roadless areas. Huh? (Individual, Tampa, FL - #A4555.10152)

With 1.6 million public comments and 600 public meetings, the roadless program had more public participation than any other rulemaking in the US federal government's entire history.

The assertion that "there was inadequate opportunity for public review and comment on the roadless rule" is grotesquely preposterous and betrays phenomenally profound ignorance of the subject.

The only way anyone could say such a thing is if they are so staggeringly clueless that they are utterly incompetent to deal with this issue, or if they have so prostituted themselves to exploiting industries that they are disqualified for gross conflict of interest.

Don't you realize this damages your organization's credibility and reputation? (Individual, Oakland, CA - #A28134.10152)

### **301. Public Concern: The Forest Service should recognize that the volume of comment received on the Roadless Area Conservation Rule was more than adequate.**

Do not in any way weaken this rule. 1.6 million people commented in the first (and we thought final!) round, and 600 public meetings were held — I simply can't believe the Bush administration is declaring that there was insufficient public comment. (Individual, Seattle, WA - #A84.10153)

I'd like to go on the record as being in 100 percent support of the Clinton Administration's decision to keep much of the national forests roadless, and I can't understand why this is being revisited after enormous amounts of public input last time around. (Individual, Bethlehem, PA - #A2.10153)

Please defend the Forest Service's Roadless Area Conservation Rule in its present form. As you know, this rule came about in response to the largest outpouring of public support for a conservation measure in the nation's history. (Individual, Bloomington, IN - #A127.10153)

### **302. Public Concern: The Forest Service should recognize that there has been sufficient local input.**

In fact, local voices have spoken - and continue to demand that the Forest Service reevaluate its stewardship of forests that are increasingly valued for recreation rather than just logging. Protecting roadless areas on the East Coast is particularly important because its natural forests are smaller, more heavily timbered and closer to urban centers. (Individual, Charlotte, NC - #A592.10150)

I have lived in the Tongass National Forest for more than 30 years. Hunting and fishing in the Tongass provide the staple foods in my home, and I use the National Forest for many kinds of recreation. I

believe that I represent what is meant by a local community resident who is strongly concerned about the Tongass National Forest, and especially about the roadless areas.

I commented on the original roadless plan, and like the overwhelming majority of the million and a half respondents, I strongly supported that plan. My most important comment is that I would like to see the roadless area policy implemented as it was written into the Federal Register on January 12, 2001.

Instead of reopening this process to address the concerns of the extremely small minority who did not support that plan, I would urge the Forest Service to implement that original policy. (Individual, Sitka, AK - #A698.10150)

I live in Pocahontas County, WV, which is more than 50% National Forest. There is a significant timber industry here with several local mills. The Roadless Initiative received more publicity than any FS project in our area since the creation of the Cranberry Wilderness. Besides the legal advertisements, there were prominent stories in the local paper and interviews with the Forest Service on our local community radio station discussing the impacts, such as the number of acres involved, the number of jobs affected, etc. This local coverage occurred over several months, before both the public meetings the Forest Service held to explain the Roadless Initiative and the formal public hearings held (ours was at Seneca Rocks here in WV) to receive comments. So many people showed up to make comments that they couldn't fit in the room. Of the dozens of people who spoke, only a handful opposed the Roadless Initiative.

So what difference is more local input going to make? How more local can you get? Or is more local input a euphemism for selective input from the timber industry, i.e. those who made sizeable contributions to the Bush campaign? (Individual, Hillsboro, WV - #A4600.10152)

### **303. Public Concern: The Forest Service should explain its assertion that there was inadequate local input on the Roadless Area Conservation Rule.**

The Forest Service should provide empirical evidence to support its assertion that there was not enough "local input" in the previous Roadless Rule public involvement process.

Which brings us to an ancillary point. Who ultimately decided that there wasn't enough "local" input in the last go round? Did someone analyze the 1.6 million comments and determine that "local" input was lacking? I doubt it. I want to know what empirical data was used to determine that this current comment period was necessary. This is a serious request for information. I am a "local person," living in a "local" community, surrounded by national forests. It would appear my opinion is the one you are seeking out. So please inform me as to why my last letter was insufficient. (Individual, Lewiston, ID - #A29569.13110)

### **304. Public Concern: The Forest Service should consider that the only groups objecting to the adequacy of the public comment process for the Roadless Area Conservation Rule are those that don't want it.**

The roadless rule's promulgation clearly satisfied any rational test for sufficient opportunity for public involvement. The roadless rule garnered more comment than any other Forest Service decision in history. The combination of over 600 local public meetings combined with national media exposure ensured that anyone with an interest in roadless area protection would have an opportunity to learn about the Forest Service's proposal and comment upon it. That over one million people chose to do so is testimony to the outreach effort.

The interest groups who now object to the adequacy of the public comment process share one thing in common - they don't like the outcome so they are crying foul about the process. However, if the situation were reversed (as it soon may be!), those same interests won't be heard objecting to the inadequacy of a much less involved public process so long as they get the results they want. (Union, Eugene, OR - #A6245.10152)

The interest groups who now object to the adequacy of the public comment process share one thing in common - they don't like the outcome so they are crying foul about the process. (Individual, Corvallis, OR - #A8027.15120)

**305. Public Concern: The Forest Service should recognize that there is inadequate opportunity to comment on the Advance Notice of Proposed Rulemaking.**

I think it is very interesting that this is being opened to public comment again, because the Administration . . . feels not enough people had an opportunity to comment the first time. Yet, the reality is that this 60-day comment period is not only during the warmest of the summer vacation days, but has no real public involvement component. The local Olympic National Forest has no public meetings planned, nor have mailings been sent to those who commented the first time. Given that members of the public would have to actively search for a way to make comment, one questions the motivation.

I urge the Administration to move ahead with the Roadless Area proposal, which has already gone through the public involvement process, ad nauseam. (Individual, Olympia, WA - #A4503.10152)

*Analysis of Public Comment*

**306. Public Concern: The Content Analysis Team should adequately analyze and report public comments.**

**SO THAT THE ACTUAL DESIRES OF RESPONDENTS CAN BE DETERMINED**

I was also extremely disappointed in the review process and found that the manner in which the comments were analyzed and reported made it extremely difficult to determine the actual desires of the commenters. The Comment Analysis Team simply categorized the comments and then chose polarized "representative" comments in each category. I have participated in BLM planning process and was much better able to determine the direction the comments were coming from in the reports their Comment Analysis team developed. Each individual commenter was listed along with a listing of which categories his or her comments belonged in. (Organization, Huntsville, AL - #A13542.15150)

**307. Public Concern: The Forest Service should quantitatively analyze public comment.**

. . . throughout this process and all others, use of quantitative language whenever possible would lead to a more open and sincere dialogue. As I understand it, the law requires comments to be entered into an official record. If that is correct, then the Forest Service can determine the number who assert as claimed and the percentage of the total commentors who assert as claimed. Citing those numbers would be clearer . . . (Individual, Nederland, CO - #A19016.11110)

**ACCURATELY TABULATE COMMENTS**

I believe this plan was rushed through without adequate comment from the public that uses the forests. I further believe the comments received by the Forest Service have not been accurately tabulated. For example the Forest Service apparently told "Heritage Forests Campaign" that I support the plan—I'm now on their mailing list as an ally. (Individual, Shingle Springs, CA - #A971.15151)

**QUANTIFY HOW PUBLIC OPINION HAS CHANGED SINCE EARLIER PLANNING PROCESSES IN WHICH ROADLESS AREAS WERE ADDRESSED**

If the basis for the proposed rules is in response to public opinion, the environmental documents should quantify how this public opinion has changed since these issues were addressed in the earlier, RARE, ReRARE, RARE II, Oregon Wilderness Act, Northwest Forest Plan, Hells Canyon National Recreation Area Act, and the various land and resource management plans. The issue of roadless area management was extensively debated in all of these processes, and the final decisions were designed to balance the various needs for the national forests. Any alteration in this balance should be addressed in the forest

plan revision process and not on a generic one-size-fits-all strategy. (County Attorney, Grant County, OR - #A17667.14140)

**308. Public Concern: The Forest Service should create transcripts of public meetings.**

Those people who appear and make comments at meetings near a particular forest know that forest far better than the eco-fundraisers with their form letters. A transcript should be made of all local meeting comments, and the commenters given a Week or two to make corrections before the comments are published both as hardcopy and on the Internet. A transcript on a computer can be instantly searched for keywords, and will be a permanent asset for local USDA forest managers. It will also be a clear indication that USDA is actually listening, rather than merely going through the motions prescribed by the Administrative Procedures Act. (Organization, Tonopah, NV - #A20337.14200)

**309. Public Concern: The Forest Service should verify the validity of organized response letters.**

As a taxpayer and a member of the forest products community I am writing to express my concerns over the validity of the Roadless ANPR comments now being received by your CAT from the enviro-radical e-mail list members.

First of all, the content of these comments addresses the political agenda of the authors rather than the science of forest management as it relates to your 10 questions.

Second, the transmittal of the comments both to your CAT and to the internet loops of "environmentalists" harps on the value of previous comments in favor of the existing roadless plan. It conceals the facts that this plan was illegally crafted in violation of the NEPA, ignored local input at all levels, and was based on inadequate mapping and inventorying of road classes in the various National Forests themselves. In essence, the entire previous public comment period was flawed because of the basic illegality of the plan actually presented for comment.

Third, the volume of e-mail to your CAT now being produced by enviro-radical call for internet action is suspect because of the repetitive nature of point-and-click on their prepared comments. You receive identical comments from thousands, with no limitations on the same person sending the same comment many times.

When Congress mandated multiple use for our National Forests, I am sure its members did not foresee the phenomenon of science-by-popular-vote springing from the explosion of the Internet. I do hope that the USFS will adhere to the science of forestry and the interests of all taxpayers in the revision of Roadless Area Conservation. (Business or Association, Keysville, VA - #A4946.15121)

**310. Public Concern: The Forest Service should disclose the details of late submissions.**

The Federal Register and the documents purporting to support the decision to reopen the issue fail to properly inform the readers of the details of the late submissions. The USDA must specifically advise the public of the following:

The identity of the parties making these late comments, and who they represented;

The specific content of the submissions, including their date and method of submission;

Whether the comments have become part of the official record;

Whether they were in writing or were presented orally during conversations with decision makers or someone with access to decision makers;

Whether such decision makers were involved in any conflict of interest, actual or implied. (Individual, Chico, CA - #A17483.14120)

## Scope of Public Comment to be Considered

### 311. Public Concern: The Forest Service should respect the comments already received for the Roadless Area Conservation Rule.

Apparently, the Administration feels that the comments in the form of: 1 million postcards or other form letters; 60,000 original letters; 90,000 electronic mail messages; and several thousand telefaxes—430 public meetings were held—about 230 for information sharing and written comments and about 200 for collecting oral and written comments including at least two meetings on every national forest and grassland that cumulatively drew over 23,000 people nationwide received on the proposed roadless area rule were too few. I would disagree, and think that the prior administration did everything possible to include ALL sides of this issue in the debate. Although I feel the public mandate is clear, I want to emphasize that there is still the support for the roadless ban and that those people who originally commented have not changed their minds. (Individual, Medford, MA - #A16.10150)

Environmental and natural resource issues seem to illuminate the polarized positions. However, it has been demonstrated that the RACR enjoys the overwhelming support of the American people. While there are those who disagree with the rule, the Bush administration needs to respect the expressed views of the vast majority, who have already made it clear that they want roadless areas protected. More importantly, the Rule reflects a balanced approach to managing National Forests. The majority of the National Forest land is managed for multiple-use and is already open to logging, mining and drilling. A mere 18% is designated wilderness. The Rule will protect the remaining 31% of the National Forests as a natural legacy for future generations.

The RACR should be implemented and retained as it stands. The Bush administration needs to do all that it can to ensure protection of America's roadless areas. We, as a nation, have ONE chance to protect our nations roadless forestland. (Individual, Durham, NC - #A934.10150)

I am writing to express my dismay at the Secretary of Agriculture's plans to reexamine the forest roadless area rule (Forest Service Roadless Area Conservation, USDA Forest Service, November 2000 and Record of Decision (published as part of the final rule, 36 CFR Part 294, Special Areas; Roadless Area Conservation, on January 12, 2001 and 66 FR 3244) and to protest the decision.

The previous administration published this rule in answer to the overwhelming desire of the people to protect our national forests. They followed the rules, received a huge amount of input from the people, and heard from every segment of the public before publishing the rule.

Now this administration is trying to undo all the good work and ignore the will of the people. The country needs to be able to rely on our government to follow the rules and play fair and reach supportable decisions and then have some degree of finality and stability. We can't constantly revisit every decision just because special interest groups that represent a small minority disagree with the desires of the majority. And you can't make decisions that benefit primarily large corporations. You just can't run the country this way.

Please please please, do the right thing: Implement the forest roadless area rules as soon as possible. (Individual, Elk Grove, CA - #A227.10152)

The Forest Service held more than 600 meetings in local communities across the country—including at least two on every National Forest—to inform their decision to protect roadless lands. This helped to generate a record-breaking 1.6 million public comments, an astonishing 95 percent in favor of stronger protection for roadless areas. Public comments on agency rulemakings are not vote counts, but it is significant that the Forest Service allowed public sentiment to help shape the outcome of the roadless rule. In so doing, the agency reaffirmed the value of public opinion in management of public lands.

The stated rationale for re-opening the roadless rule is to hear from more local communities and to subject the future of roadless areas to the local forest planning process. It is exceedingly unlikely that reopening the roadless rule will surface new issues. What is certain is that the 600 local public meetings

and the 1.6 million comments—from people that care deeply about public lands and presumably live in local communities—are being discounted. (Individual, Points, WV - #A21262.10152)

**BY CONSIDERING COMMENTS SUBMITTED FOR THE ROADLESS AREA CONSERVATION RULE ALONG WITH THOSE SUBMITTED FOR THE ADVANCE NOTICE OF PROPOSED RULEMAKING**

I hope that the comments you receive at this time will be considered along with the many comments you received during the development of the EIS. It would not make sense to require the many people who commented in the first round to resubmit those comments. (Individual, Grangeville, ID - #A798.10152)

My first suggestion is that the existing comments on the previous roadless area decision represent several months of hard work and thought of citizens who had more ample time to consider their positions, and should be given AT LEAST equal consideration in your decision-making process. Failure to do so, I believe, threatens to erode the public trust in the USFS. (Individual, New Haven, CT - #A706.10154)

The President himself, in another and different context, recently stated, “The American people deserve a President who will listen to people and make a serious, thoughtful judgment.” However, if that is to be true, then the Administration would make a judgment to sustain the Conservation Rule, for the American people have certainly expressed themselves in favor of it and can hardly be expected to do more. For these reasons, we strongly urge that, in order that all who have evinced a desire to comment on this issue be included, the record on this public notice incorporated by reference—and you could use summaries where practicable—all comments previously submitted on the Conservation Rule. This is needed particularly so that those who went to the trouble to comment previously will not be left out. This is a very real problem since those who are voluntarily submitting comments (as distinguished from those who do so as part of their jobs) often might find there are too many things for them to handle in their volunteer or spare time and might not comment again. Yet, they should be heard. Consequently, we strongly recommend that all the previous comments be incorporated by reference. (Organization, Birmingham, AL - #A21582.15165)

**312. Public Concern: The Forest Service should include all previous comments regarding roadless area management in the record for the Advance Notice of Proposed Rulemaking.**

We respectfully request that all previous testimony, letters and comments from the people of Montana regarding national forest roadless area management, including that provided to the U.S. Forest Service in 1998 (interim roadless rule), in 1999 (scoping hearings and public comment record) be incorporated into the current public comment record initiated by the advance notice published July 12, 2001. (Organization, Helena, MT - #A21370.14000)

**INCLUDING THE COMMENTS SUBMITTED BY THE ENVIRONMENTAL PROTECTION AGENCY ON MAY 21, 1973**

The entire comment package that was submitted by the U.S. EPA to the U.S. Forest Service on May 21, 1973 should be included as part of the record for the Roadless ANPR comments. (Organization, Coeur d’Alene, ID - #A13314.15140)

**313. Public Concern: The Forest Service should not accept mail-in public comments.**

**BECAUSE THAT ENABLES GROUPS TO HAVE UNDUE INFLUENCE**

I know that my own cynicism is showing, but I have never yet seen a “fair and open” process occur in a Forest Service hearing on anything. I don’t really believe that the Forest Service should do anything beyond hosting a meeting of select, local interested people who would work out all details and present a proposal to the local FS that must be followed for the local forest. To allow any one group or viewpoint to have “super influence” through opening it to mail-in public comments (as happened with the

environmental industry during the last Roadless Area go 'round) would make it as the last one was, another travesty. (Individual, Pendleton, OR - #A666.14200)

### **314. Public Concern: The Forest Service should disregard organized response letters.**

Many of the cards and letters supporting the Initiative were sent at the behest of radical environmental groups. Many senders did not actually read the Initiative, have no comprehension of its certain and negative impacts upon forest health and rural residents, and responded only to a 'feel good' campaign. All form comments, whether by letter, post-card, or e-mail, should be disregarded. This issue is too complex and too far-reaching to be decided by someone with 5 minutes to sign his name and add a stamp or click a button. (Individual, Cedaredge, CO - #A10364.14100)

## *Consideration of Public Comment*

### **315. Public Concern: The Forest Service should consider all comments.**

The agency's consideration of comments was deficient in critical respects. For example, the Vail Resorts filed substantive comments in December 1999 on the scoping notice and filed additional comments in July 2000 on the proposed rules and draft environmental impact statement. (A copy of our July 2000 comments is attached. Our December 1999 comments will be resubmitted under separate cover). Our comments were the product of significant effort and addressed specific inventoried roadless areas and other issues of concern to the Vail Resorts. The Forest Service, however, ignored many of the comments we raised and made no attempt to respond to our comments concerning specific inventoried roadless areas. We do not offer these observations lightly. They are based upon careful review of the draft and final environmental impact statements, the agency's responses to comments, conversations with [the] Forest Service Roadless Project Leader . . . and a December 2000 visit by Vail Resorts representatives with . . . members of the Forest Service's comment response team in Utah. (Permit Holder, Avon, CO - #A28852.10134)

Never mind the stacked hearings in Denver, Pueblo, and later Missoula and Kalispell that I attended. All the hired guns spouted their scripted message and clapped at the proper points . . . a substantive discussion of what was in the document and the "intellectual" origins of the proposal was never possible. As for the comments I submitted—done in tandem with a retired USFS planner—they were blown off as not substantive.

Well, my time was substantive and uncompensated. I live in a community that will be substantially affected by the outcome of this process, and it is my concern for my hometown, its citizens, the local wildlife and forest, and my own damned future that motivated me to put in this effort. The fate of the forest matters a lot to me and to my neighbors . . . in light of the Moose fire and the untreated fuels and the management paralysis . . . implementing a "roadless" policy that in any way resembles the Dombeck effort would be a crime against not only humanity, but nature.

The consequences are on the ground . . . and that's where the decisions should be made. (Individual, Whitefish, MT - #A20672.10130)

#### **BY GIVING EQUAL CONSIDERATION TO EVERY VIEWPOINT**

There is a place within the management of the National Forest system for each and every one of us, for each and every use. There has been significant change in the management of America's National Forests, and there is sure to be more. It is only fair and just however, to expect that the process of change follows the laws and principles of the nation and [to] give equal consideration to every aspect of the effects of this change. (Business, Juneau, AK - #A30599.10000)

#### **TO ENSURE A FAIR AND OPEN PROCESS**

Because there are so many different levels of interested people in our forests and how they are managed this may well be one of the most difficult portions of this program to reach. Every individual of each

level thinks that his or hers is the only way and they want first attention. This can only be captured in the most part by a fair and open process.

Each and every concern must be addressed no matter how trivial it may seem. Anyone left out is cheated out of their input. All comments should be given the utmost sincere consideration. (Individual, Rock Springs, WY - #A5695.15150)

#### **WITHIN THE CONTEXT OF MAINTAINING FOREST HEALTH**

NEPA provides for all to contribute comments through an Environmental Assessment or Impact Statement, but all comments should be put into the context of the highest priority—forest health. Advertising in local and regional papers and allowing for comment through email seems to work well. (Individual, Ennis, MT - #A438.14100)

### **316. Public Concern: The Forest Service should not reject consideration of issues just because they were already addressed in the Roadless Area Conservation Rule Final EIS.**

The Forest Service has represented that the Final Plan Revision will have a public comment period of six months, from July 27, 2001 to January 27, 2001. However, the Forest Service officials have stated orally that if a public comment issue was addressed in the FEIS, it will not be considered. Read literally, this means that the public comment process on the final plan revision and FEIS will not address the issue of roads in the roadless areas, section lines, and energy interests, because those issues were raised and rejected previously. (Elected Official, McKenzie County, ND - #A27737.11000)

### **317. Public Concern: The Forest Service should give all parties' comments equal weight.**

#### **BOTH LOCAL AND NATIONAL COMMENTS**

Base decisions on sound science, not politics. Listen to all views, but give each citizen's comments equal weight regardless of where they live in relation to the forests (these are national treasures for all Americans to use, not private sanctuaries to be locked up for locals only. (Individual, Layton, UT - #A5139.15000)

The danger of local management is that the local people don't always have the interests of the majority of people at heart—they are concerned with maintaining their way of life at all costs. I truly believe that we need to use our remaining natural resources with the long term in mind. Local people cannot be left out but deserve no more of a vote than any other American who owns the national forests. It is absolutely essential that all American's votes count equally. If that rule is violated you violate the founding principle of our government. (Individual, Cascade, ID - #A4.15112)

#### **COMMENTS FROM ALL INTEREST GROUPS**

One group's or individual's interests should not be put ahead of another's just because the agency decides it is expedient or because one group or individual threatens litigation. As mentioned earlier, all decisions that impact the public should be open to public comment, and those comments should be given their full weight regardless of whether or not they agree with real or desired FS policy or opinion. And in no circumstance should any party be given the opportunity to meet with FS officials without any and all other interested parties being given the opportunity to be present. This was a major problem with the formation of the original rule, the anti-recreation groups' input was solicited and valued without benefit of potentially contrasting opinion and input of other stakeholders. The public should not find fault with a process that is done fairly and openly, but it has every right to find fault with a process that favors one party over another. (Individual, Los Alamos, NM - #A3720.15110)

We need the establishment of an overall roadless plan so that interested lay persons, like myself, can communicate our vision for these federal lands, which belong to all citizens, and not just to the logging and motorized toy industries. Unlike the paid lobbyists for these industries, citizens like myself are not

always available for endless meetings or public comment on individual forest plans or the micro managing of specific tracts of land. Always making decisions at the local forest level often leaves citizens in other areas of the country out of the process. These citizens have just as much right for their vision to be heard as the paid lobbyists and local business people who often have economic interests at stake that might be in conflict with the overall health of the land. (Individual, Missoula, MT - #A5325.14000)

#### **COMMENTS FROM ORGANIZED RESPONSE LETTERS**

I am angered by newspaper articles and remarks from senators, congressmen, and members of the Bush administration stating that the majority of support for the roadless policy comes from email based form letters and that such support for the roadless given lesser consideration. I cannot express enough how strongly I disagree with such remarks. How is this any different than writing a petition and getting a list of signatures? I take the time to read the contents of the form letters that I submit. If I do not agree with everything stated, I will not click the send button. I am sure that most everyone else who has sent an email form letter would agree. (Individual, Bozeman, MT - #A3947.15150)

### **318. Public Concern: The Forest Service should differentially weigh public comments.**

#### **BY GIVING GREATER WEIGHT TO LOCAL AND RESOURCE-DEPENDENT INTERESTS**

In evaluating comments and input for management decisions from individuals and groups with strongly competitive views, values and beliefs, the USFS should apply a weight or priority system. The most weight should be to those who derive their livelihood from the public land. The next priority should be given to LOCAL public land users; sportsmen, campers, hikers, off road vehicles, and recreation users. All general and out of the local community area comments and input should be given last weight. It is important to understand that we, the local people, live near public land because we choose to and we resent outstand influences (those who have never visited the area and do not understand the local issues) dictating our lifestyle and livelihood. (Individual, Prairie City, OR - #A15474.15160)

#### **BY GIVING GREATER WEIGHT TO PROFESSIONAL FORESTERS, WILDLIFE BIOLOGISTS, AND FIRE MANAGERS**

Professional foresters from federal, state and private entities, as well as wildlife and fish biologists and wildland fire managers from those same entities must provide their experience and expertise and that should also be heavily weighed when forming any resulting policy. (Organization, Moscow, ID - #A15318.15110)

#### **BY GIVING GREATER WEIGHT TO INDIVIDUALS THAN TO BUSINESSES**

We realize that the American Forest and Paper Association has a particularly important role in the decisions being made concerning these areas. It is our firm belief that, while a corporation such as the American Forest and Paper Association does have a say in these matters, a corporation is not a constituent, therefore, should not be accorded the rights and privileges identical to those of individuals. In today's world, big businesses are often dealt with as if they were constituents, being given the same rights and privileges. Yet, big businesses are not people, and should not be treated as such. We urge you to recognize that the voice of a single person is far more important than the concerns of any corporation. Every American should be concerned with the protection of our Nation's wildlife and the preservation of our forests. Any person who shows an interest in protecting the nation's forests will hopefully be doing so with his or her own intentions in mind, however, a corporation would be more interested in achieving selfish goals. The American people have nothing to gain from the destruction of the Nation's forests, however, they have a lot to lose. Many people enjoy spending recreational time in our forests: biking, camping, fishing, hunting, and even gaining spiritual and religious experiences. If we continue to allow our forests to be destroyed, soon there will be little remaining for anybody to enjoy. On the other hand, a corporation such as the American Forest and Paper Association would be gaining, not losing, from the destruction of our forests. (Individual, No Address - #A28553.15122)

### **BY GIVING LESS WEIGHT TO ORGANIZED RESPONSE LETTERS**

The proponents are quoting the fact that you received over a million responses to your original proposal—and that “the American people have spoken”. Maybe. How many of these were real letters and how many sent in a canned response proposed by some pressure group or was a paid advertisement on my e-mail to be activated by a single click. You need to discriminate between the responses. I put little weight on all those canned messages—and I hope you do too. (Individual, No Address - #A29894.15152)

The process of determination using comments from the public as an indicator of approval/non-approval is flawed. The vast majority of the citizens of the State of Montana are opposed to the roadless area but I believe that less than 1% of those people would ever respond to your request for comment. Those in favor of the roadless area as proposed are well organized with letter and e-mail writing campaigns. I would hope that you understand that process and discount it appropriately. (Individual, Kalispell, MT - #A27110.15110)

### **BY GIVING LESS WEIGHT TO UNFOUNDED AND BIZARRE VIEWPOINTS**

I should add that most of those against the roadless policy also went on to comment about the Forest Service being an extension of a worldwide United Nations/communist conspiracy trying to take over land in the US. When you ask for fairness and collaboration do you mean that these obviously unfounded and bizarre viewpoints should honestly be working in partnership with the Forest Service to help shape public policy? (Individual, Atlanta, GA - #A26430.15110)

Hey, what was unfair about the process last year? Who (among 1.6 million respondents) did not have his or her chance to weigh in on this issue? The USDS Forest Service does not have to try to find a new and better way to elicit comment on roadless values as the best way was already used last year. I personally attended 3 public hearings in Gainesville, Ga. and Atlanta. The only unfair thing I experienced was state DNR representatives in uniform openly advocating against the roadless policy. I thought that was very unfair. I should also add that most of those against the roadless policy also went on to comment about the Forest Service being an extension of a worldwide United Nations/Communist conspiracy trying to take over the land in the US. When you ask for fairness and collaboration do you mean that these obviously unfounded and bizarre viewpoints should honestly be working in partnership with the Forest Service to help shape public policy? (Individual, Santa Rosa, CA - #A25389.10152)

### **BY GIVING LESS WEIGHT TO “NON-PARTICIPANTS”**

The National Forest Planning process for each National Forest is the most suitable method by which the USFS can employ collaborative groups made up of local citizens and organizations. Caution must be observed in recruiting, organizing and recording a collaborative group’s recommendations. The USFS must be empowered to assign consequences to “non-participation” for whatever the reason. While dissent from those not participating should be captured and recorded, without participation in the process, the dissent should carry far less weight than that of those willing to participate. Rules for voting and for “qualifying to vote” must be part of the collaborative process framework. “Participation” would imply being present for most of the interactive process from inception to a true and recognized ending. (Organization, Moscow, ID - #A15318.15162)

### **BY CONSIDERING RESPONDENTS’ QUALIFICATIONS AND IMPLICATIONS OF SUGGESTED COURSES OF ACTION**

The demands of the public that you need to weigh must be qualified both as to the level of information the respondent is forming their opinion upon, as well as that course of action’s result on the total base which you manage. Dale, fundamentally, as agency chief, you need to make some critical decisions that will be of paramount importance to the continuing health of the forest. They may not suit the loud catcalls that are trying to drown out the simple fact that the lands you are Chief over are not parks, but live, working forests that produce not only emotional but tangible commodities for the American public. Trite as it might sound, consider that every purchase of OSB, studs, dimension of plywood from the American Forest Products Industry is a vote for pro-active management of the national forests that

clearly opposes waste of potential wood products. (Business or Association, Hamilton, MT - #A25779.15160)

#### **AT PUBLIC MEETINGS**

The Forest Service should conduct public hearings that invite all interested parties, who should be asked to identify not only their opinions, but also what financial interests they have in the outcome of the proceedings. The interests of recreational and other transient users should be solicited from lists of people who register with the Forest Service, rather than relying on their serendipitous ability to attend hearings in areas far from where they live. Corporate interests should have no more weight than those of others, and the interests of people who benefit from the existence of forest sanctuaries but are not aware of either the forests or the hearings—for instance, people who benefit from the environmental processing of air and water that occurs in forests—should be given substantial consideration, perhaps through the assistance of expert testimony. (Individual, New Haven, CT - #A616.15000)

### **319. Public Concern: The Forest Service should consider special interest groups' comments with caution.**

#### **SPECIAL INTEREST GROUP LEADERS DO NOT NECESSARILY REFLECT MEMBERS' OPINIONS**

The leaders and lobbyists of national special interest groups such as the Sierra Club do not necessarily reflect the opinions of their members. In fact, it is my opinion that these people only reflect the opinions of the most extreme of their membership. (Individual, Saint Louis, MO - #A629.15121)

#### **SPECIAL INTEREST GROUPS DO NOT NECESSARILY REPRESENT THE VIEWS OF THE LOCAL COMMUNITY OR OF THE PUBLIC AT LARGE**

I noted a Letter to the Editor in the August 24, 2001 Crested Butte News by Mr. Sandy Shea of HCCA indicating among other proposals the reversion to roadlessness of Flat Top Mountain. Fortunately via the excellent websites of USDA Forest Service I was able to acquaint myself with this issue relatively quickly. It appears that HCCA has the purpose of providing the Regional Forester with a community consensus of the Roadless Conservation Rule to soon be formulated and implemented. I can state clearly that this group has had no input from me, seems to be exclusive on any outside input, and gives every indication of recommending policies compatible to that of HCCA. I have asked for minutes, meeting dates, and other information regarding this group to no avail. I am concerned that my situation will be replicated with other individuals and small groups concerned with specific issues in public land use access in Gunnison County and elsewhere. (Individual, Littleton, CO - #A13845.15120)

The public meetings have been more convenient for organized groups and paid lobbyists than for many local citizens. In Georgia, we have seen the same few individuals making the same comments at every meeting. It is no surprise that the preservation agenda is so prevalent among the citizens at these meetings. Although public meetings are an important tool in obtaining input, we feel they are biased and do not necessarily give an accurate representation of overall public desires. (State Agency, Social Circle, GA - #A22054.14200)

### **320. Public Concern: The Forest Service should identify input from those with a monetary stake in the outcome.**

In all cases, efforts should be made to identify and “flag” input coming from those with monetary stakes in the outcome of any planning process, including employees of the Forest Service as well as employees/owners of potentially-impacted timber-related businesses, etc, so as to achieve, at the very least, full and open disclosure of all factors possibly influencing the process and its results. (Individual, Bishop, CA - #A20954.15120)

**321. Public Concern: The Forest Service should recognize that those with financial interests in forest resources have an incentive to submit detailed and aggressive responses.**

Open, on the table, broad based public participation is appropriate, remembering that those with schemes for destruction of our forests for financial gain have an incentive to be much more detailed and aggressive than many of the citizens who generally [support] the roadless rule. (Individual, Pasadena, CA - #A17237.15110)

**322. Public Concern: The Forest Service should evaluate the consideration it ought to give to the majority opinion.**

**GIVE SERIOUS CONSIDERATION TO THE MAJORITY OPINION**

As noted recently by an Agriculture Department spokesman, a rulemaking is not a vote. However, in a circumstance where public opinion weighs heavily in a particular direction, that public opinion must be granted serious consideration, and the possible actions should be tempered accordingly. I look forward to seeing that consideration of the public comments received reflected in any modifications that are put forward in the course of this rulemaking. (United States Senator, Washington - #A30693.15110)

**DECIDE THE MANAGEMENT OF ROADLESS AREAS THROUGH A PUBLIC VOTE**

The Forest Service should try to put the Roadless act on a ballot in the Fall, and let the general public decide the issue once and for all. The inventoried roadless area is on our land so why not let us, as a country decide the fate of our National Forests. We decide on our presidents this way, why can't we decide the fate of our forests this way as well? (Individual, No Address - #A17702.15151)

**DO NOT ALLOW THE PUBLIC COMMENT PROCESS TO TURN INTO A VOTE**

In the previous rule making process we saw public involvement become a voting process orchestrated by the giant environmental organizations and involving masses of people with no real knowledge of the roadless areas or the real issues surrounding them. They responded to what they were told, even though much of that information was false and misleading. We would hope that this new effort would be more professional, looking at content, not numbers. (Individual, Boise, ID - #A5165.15120)

Solicitation from user groups is extremely important in the context of roadless decision-making. The agency must also ensure that accurate, up-to-date maps of inventoried roadless areas are provided in the forest planning process. As a general matter, the agency should judge the quality, not quantity, of comments submitted in the forest planning process. Too often emphasis is placed on the number of form letters or emails received by activist groups rather than the thoughtful, individual comments of stakeholders or local user groups. (Permit Holder, No Address - #A5285.15150)

If this 60 day review is reduced to a massive letter writing campaign, Alaskan's wishes and opinions cannot prevail. For more than thirty years, the lower 48 decision makers have viewed their vote on Alaska as the place to win the support of the preservationists while doing less in their own state. There is no way that a uniform roadless policy can be applied to all national forests. Please support the majority of Alaskans and not allow the decision to be made based on which side sent the most comments. (Business or Association, Juneau, AK - #A879.15111)

Don't look at numbers of comments as a deciding factor. It is the quality and substance of comments that should weigh into decisions. Many comments come from people with no knowledge of the lands or issues being addressed. They simply respond dutifully to pleas for cards and letters. At the initial rule making hearings we saw busloads of activists arriving in a party mode to present testimony from cards randomly handed to them. We see thousands of cards and letters generated by campaigns that tell them what to say. This is a game originated by environmental organizations that everyone has learned they must play. How many of the responses come from people who have actually read the documents they are

commenting on? When a few hundred documents are distributed and several thousand responses are received, the answer is pretty evident. (Individual, Montpelier, ID - #A9058.10153)

This is not a vote. Don't pretend to make it a vote. You are asking for substantive comments to help with decisionmaking. If a group sends you 10,000 cards with the same comment, it still only counts as one substantial comment. If you want a vote, get it on the ballot in every state. The only vote that counted took place in Florida last November. (Business or Association, Spokane, WA - #A21364.10133)

I read this week in the local paper that the Sierra Club and allied environmental groups "say they hope to have collected 2 million written responses" to the Forest Service's July 10, 2001, ANPR. I cannot recall a time in our history when the regulatory comment process has been so captured by such a "vote" mentality. It certainly was never the intent of the Federal Administration Procedures Act. I wish for the day when we can turn management of our national forests back to the Forest Service professionals. (Individual, Spokane, WA - #A17819.10133)

**RECOGNIZE THAT MAKING DECISIONS BASED ON MAJORITY PREFERENCE IS A VIOLATION OF THE AGENCY'S CONGRESSIONALLY MANDATED DUTY**

The mandate of the Forest Service, as an agency of the Executive Department of the United States government, is not determined by meeting the desires of concerned individuals or organizations, it is determined solely by congressional directive. The Forest Service is bound to meet congressional mandate as set forth in federal statute, including NFMA (16 U.S.C. [sec] 1600, et seq.), the National Environmental Policy Act (NEPA) (42 U.S.C. [sec] 4321, et seq.) and FLPMA (43 U.S.C [sec] 1701, et seq.). The Forest Service may not consider the desires of individuals and groups as to a particular outcome of the forest planning process as "votes" and thereafter make its decision on a majority-rule basis. Such is a derogation of the Forest Service's congressionally mandated duty. (Organization, Denver, CO - #A29624.15100)

**323. Public Concern: The Forest Service should avoid relying on public opinion surveys.**

**BECAUSE THEY ARE ERROR PRONE AND UNRELIABLE**

We caution against the reliance on public opinion surveys and interpretations thereof relative to the public's position on NFS management. Absent a close scrutiny of the question and the manner in which the poll was taken these reports are fraught with error and are notoriously scientifically unreliable. (Elected Official, Douglas County, OR - #A11811.15150)

**324. Public Concern: The Forest Service should consider material comments.**

**AS REQUIRED BY THE NATIONAL ENVIRONMENTAL POLICY ACT**

**North Dakota Litigation: *Billings County, et al. v. Veneman***

The ANPR incorrectly describes the North Dakota litigation as sharing a common theme with the other seven pending lawsuits that there was inadequate opportunity for public review and comment. 66 Fed. Reg. at 35919. The North Dakota litigation does not make that allegation. The complaint filed by several North Dakota counties and the Friends of the National Grasslands does allege that the Forest Service violated NEPA by ignoring the material public comments regarding the proposed wilderness or roadless conservation areas, road rights and county royalty rights. Complaint [sections] 11,70. The North Dakota case takes the position that countless comments on the Dakota Prairie Grasslands Draft Plan Revision, the roadless rule and forest road transportation regulations that North Dakota lands managed by the Forest Service are not subject to the same laws and roadless management is both without legal authority and not feasible given the extensive network of roads and rights-of way which run through each and every one of the "roadless conservation areas" in North Dakota. The North Dakota situation is also different because the final plan revision converts the proposed wilderness areas to roadless conservation areas, while purporting to make site specific determinations that these areas have roadless or wilderness

values. The decisions in the DPG Plan Revision are no more accurate nor valid than the roadless regulation now so heavily criticized throughout the country.

The commenters believe that the remedy is not a matter of additional public comment but one of compelling the Forest Service to deal with the facts and the legal issues which apply to North Dakota. So far the Forest Service has largely ignored the material facts because they did not fit the policy decisions already made at the national level. (Organization, Denver, CO - #A21358.10131)

The ANPR incorrectly describes the North Dakota litigation as sharing a common theme with the other seven pending lawsuits that there was inadequate opportunity for public review and comment. 66 Fed. Reg. at 35919. The North Dakota litigation does not make that allegation. The complaint filed by several North Dakota counties and the Friends of the National Grasslands does allege that the Forest Service violated NEPA by ignoring the material public comments filed on the proposed wilderness or roadless conservation areas, road rights and county royalty rights. Complaint [sections] 11, 70. This is an important distinction, because the remedy is not additional public comment but a requirement that the Forest Service actually deal with the facts presented. So far the Forest Service has ignored the material facts because they did not fit the policy decisions already made. (Elected Official, McKenzie County, ND - #A27737.14000)

## *Response to Public Comment*

### **325. Public Concern: The Forest Service should adequately respond to public comment.**

#### **REGARDING SPECIFIC ROADLESS AREAS**

We are troubled by the agency's failure to respond to comments about specific areas that have never been identified as inventoried roadless areas in a process subject to public comment or are otherwise not appropriate for roadless designation. Our July 15, 2000 comments devoted considerable effort to addressing whether particular areas had been properly inventoried as roadless. See July 15, 2000 Comments at 13-19. The Forest Service did not respond to these comments. See Final Environmental Impact Statement Vol. 3. (Permit Holder, Avon, CO - #A28852.10131)

#### **TO COMPLY WITH THE COUNCIL ON ENVIRONMENTAL QUALITY REGULATIONS**

I would also hope that this time around that the Forest Service does a better job in responding to public comments than you did for the DEIS on the Roadless Area Conservation Plan (RACP). Combining, paraphrasing, and then giving general responses to comments resulted in a total loss of any meaning of the comments themselves. Negative comments related to the legality of the whole process, etc. were either glossed over or totally ignored in the RACP FEIS. As a former Environmental Coordinator at the National Forest level (Modoc NF, R5, 1978-86) I find this disregard for the provisions of the CEQ Regulations to be most disturbing. In my opinion this approach violates 40 CFR 1503.4 (a) and (b), both of which require that responses to comments be more detailed, and that the comment letters themselves, or a summary of lengthy letters, be published in the FEIS regardless of their content or perceived merit. Letters from public officials were published, but none from the general public, and this does not meet the spirit of the regulations by any means. (Individual, East Kingston, NH - #A4893.14000)

## Other

### **326. Public Concern: Organizations which solicit comment for federal land policies should assure the public that all comments will be submitted to the appropriate agency.**

#### **REGARDLESS OF THE POSITION TAKEN BY THE RESPONDENT**

I am a reporter for the Record-Courier in Baker City and last week I wrote a guest editorial about Roadless Areas and gave readers an address to write to with your name on it, from a flyer sent out to all college students by the Oregon Natural Resources Council.

Now I believe the address given by the radical ONRC, although addressed to you, was their own address and they have in mind sorting and destroying those letters against the Roadless Areas.

From what I can find out—"American Lands" is "American Lands Conservancy" 726 7th street SE: Washington DC: 20003, and not a part of the U.S. Forest Service as I and others were led to believe at first glance at these flyers.

Thinking that I was writing to the Forest Service, and you, I sent a 21 cent post card, my sister sent one, and my husband signed one and had me mail it. Others also sent cards but I do not know which ones. OPPOSING Roadless Areas.

I want to know whether or not you receive the mail addressed to you at the American Lands address.

If what I suspect is true you are receiving only the part of your mail these people want you to see. (Individual, Richland, OR - #A19215.14140)

## **Public Involvement in Decisionmaking**

### **Summary**

**General Comments** – One frequent comment regarding public involvement is that the Forest Service should protect the right to public participation in forest planning. Respondents state that the public “owns” public lands and should always be involved in decisions concerning these lands. People say the Forest Service should be responsive to the public and address concerns from all sectors of society. In order for the Forest Service to do so, respondents suggest establishing strong lines of communication with the public and understand how National Forest management affects local communities. Another respondent also believes that it is critical that dialog with the public be intensive and ongoing, rather than limited to closed-ended comment periods on specific plans. One individual urges the Forest Service to require those who want to participate in forest management decisions to contribute to forest stewardship activities, asserting this would create “a good working relationship between local entities and national management.”

**Role of the General Public** – Respondents suggest that the Forest Service should allow all citizens full access to the decisionmaking process and that all viewpoints are considered fairly. Along these lines, others suggest the Forest Service should also ensure interested parties the opportunity to provide site-specific input regarding individual roadless areas so if there is a recognizable local need in a specific area, procedures for granting exceptions to the roadless rules may then be provided.

**Role of Local/Rural Residents** – Some comment that the Forest Service needs to be more inclusive and attentive to local opinions and desires. while others claim that there has never been a federal regulation that considered local input as much.

**Role of Special Interest Groups** – A number of respondents comment on the role of special interest groups. Some request that the Forest Service include certain interest groups in the

decisionmaking process; a few suggesting they be put in charge of public involvement. However, of those who address this topic, most advise the Forest Service not to “pander” to organizations because, they say, such groups want to prevent the majority of the nation from enjoying their lands. A number of respondents assert that the development of the Roadless Rule was orchestrated by specific special interest groups, hence it was not an open, fair rule-making process.

Respondents who comment on the role of resource user groups in decisionmaking advise the Forest Service not to “pander” to such groups. People suggest that the process should respect the will of the people rather than that of “special interests that profit from the consumption of natural resources. Others suggest that the Forest Service exclude resource user groups from the decisionmaking process altogether, because of perceived ulterior motives that do not take into account the health of the land.

**Collaboration Processes** – A number of respondents comment on collaboration processes. Some state that the Forest Service should adequately incorporate collaboration in the decisionmaking process. According to one organization, they do not believe there is any decision made by the Agency that demonstrates collaboration in the planning process, as opposed to simple comment opportunities. Some also suggest models that the Forest Service should follow in collaboration. These models include the Winiger Ridge Ecosystem Management Pilot Project and the Enlibra Process. Others, however, doubt the effectiveness of collaborative processes. Some advise the Forest Service to avoid over-reliance on collaboration. These respondents believe that collaboration is limited to solving easy problems; gives resource user interests unfair influence in decisionmaking; displaces traditional sources of legitimacy, such as the electoral process of representative democracy; and is an unrealistic solution because of the required time commitments. Respondents also state that agreement between parties may not be possible, and that an emphasis on collaboration may lead to policies that are agreeable rather than high quality. In addition, some suggest that the term “collaboration” carries the connotation of bias in decisionmaking.

**Collaboration with States, Local Governments, and Agencies** – A number of respondents offer comment regarding collaboration with specific entities. Some request that the Forest Service collaborate with states and local governments in managing roadless areas. Respondents suggest that this should be done by respecting state regulatory authority, by creating a staff position for a state liaison, or by establishing a state oversight team. Others suggest various entities that the Forest Service should designate as cooperating agencies, such as the states of Montana and Wyoming, and Wyoming county commissioners and conservation districts. In connection with these suggestions, writers state that the Forest Service should establish a consistent system for extending cooperating agency status to local entities. Some also assert that the Forest Service should collaborate with counties and local communities in managing roadless areas.

**Collaboration with Other Groups** – In addition to collaborating with state and local governments, people also suggest the Forest Service collaborate with agencies such as the U.S. Fish and Wildlife Service in forest planning and management of roadless areas. Suggestions for effective collaboration with other groups range from creating a Board of Trustees to employing resource advisory committees to generally recommending guidelines to ensure adequate collaboration. Respondents state that the Forest Service should explain laws and how they apply to decisionmaking, arrange face-to-face working groups of all interests, create partnerships that

are inclusive of all economic levels, and recognize the collaborative efforts of special interest groups.

**Education** – Some respondents believe that the Forest Service should educate the public; they often assert that the Agency should educate people rather than lock them out of the land. Suggested education topics include the importance of managing public lands for the greatest good for the greatest number over the long term, the facts about and benefits of the Roadless Area Conservation Rule, and resource management needs. One individual suggests that the Forest Service adopt the “Wood is Good” campaign to change the way people view wood-based products. People also suggest how public education should be carried out. Suggestions include publishing informative articles, producing a television program regarding roadless areas, and developing a seminar for new users and monitoring all uses.

**Volunteerism** – A number of respondents advise the Forest Service to encourage volunteerism. As one person points out that if people feel strongly enough about an issue, they should be willing to pitch in and help out. Some respondents suggest that volunteerism would be an effective way for the Forest Service to cut maintenance costs. Suggested potential volunteer groups include various user groups, troubled youth, hunters, anglers, and retirees.

### *Public Involvement in Decisionmaking General*

#### **327. Public Concern: The Forest Service should protect the right to public participation in forest planning.**

We understand that the Bush Administration is also trying to amend the laws concerning planning for our National Forests to limit public participation! Since the public “owns” our public lands, it is extremely important that our right to participate in planning be protected. (Organization, Escalante, UT - #A27872.15110)

#### **328. Public Concern: The Forest Service should establish strong lines of communication with the public.**

##### **TO UNDERSTAND HOW MANAGEMENT AFFECTS COMMUNITIES**

The Forest System Land and Resource Management Plan is a contract between the American people and the Forest Service that describes how the American people’s National Forests will be managed. We ask that you develop strong lines of communication with the public and understand how National Forest management affects our communities. (Business or Association, Jackson, MS - #A4824.15000)

##### **BECAUSE MANY PEOPLE DO NOT UNDERSTAND HOW DECISIONS AND LIFESTYLE CHOICES ARE RELATED TO LAND MANAGEMENT**

USFS efforts to communicate with the public about management of national forests can definitely be improved. Congress should allocate funds to allow the USFS to develop and maintain ongoing forums for dialog with the public. The agency should provide training and acquire personnel with backgrounds in social science and public communication, and de-emphasize its historic focus on natural science and extractive industries and material resources. Because humans are more disconnected from the natural world, and out of touch with ways our decisions and lifestyle choices are related to land management than at any time in history, it is critical that dialog with the public be intensive and ongoing, rather than limited to closed-ended comment periods on specific plans. (Individual, Corvallis, OR - #A650.15152)

### 329. Public Concern: The Forest Service should be responsive to the public.

#### BY ADDRESSING CONCERNS FROM ALL SECTORS OF SOCIETY

I appreciate your taking comments on the roadless area plan. I attended many of the meetings and feel that none of my concerns were met. There seemed to be a present plan to close roads with a five mile radius which could ultimately block out the entire forest. (Individual, No address - #A5229.10131)

They continue to say that they had over 600 public meetings and 1.6 million public comments, but of course, they are not available to the working people of the United States. If we had college students writing on our behalf, maybe the Forest Service would have to acknowledge our comments. I've been told by a Forest Service Supervisor that You are not the Sierra Club so I don't have to worry about your input. Needless to say, unless I can get Representative McNinnis to assist users in writing to the Forest Service, I believe our comments are useless. Even Rep. McNinnis was given the cold shoulder under the Clinton Administration and Bruce Babbitt. (Individual, Castle Rock, CO - #A3628.10132)

ARRA believes that the Federal Government in collaboration with the States, local governments, Native Americans, and other affected individuals and organizations can promulgate policies that truly reflect the needs and desires of a wide range of Americans. When the original Roadless Rule was developed, it was apparent that many sectors of our society were not invited by the government to provide input on this rule. True consensus and respect for policies cannot be achieved unless all stakeholders feel that they had a fair chance to have their voices and concerns heard. If we truly care about appropriately managing and protecting our national forests, then seeking a consensus among a variety of interested parties provides the best means of preserving the country's natural heritage. (Organization, Washington, DC - #A5069.10132)

Thank you for soliciting additional comments on this important rule. When the original rule was released earlier this year, I felt that many of us in the recreational community were not given adequate opportunity to express our concerns and ideas about the roadless issue. Therefore, thank you for re-opening this issue for additional input from those of us who care about the environment and who seek opportunities to recreate on public lands. (Individual, Anaheim, CA - #A5169.10133)

### 330. Public Concern: The Forest Service should recognize that public involvement during development of the Roadless Area Conservation Rule was sufficient.

The ANPR requests input according to a set of questions regarding issues, access, wildfire prevention, forest health, that have already been addressed in the existing policy. **I refuse to engage in a debate so inherently flawed.** We already had the debate to determine the future of public roadless lands, and the people spoke loudly and clearly. They asked the Forest Service to protect roadless lands with a strong national policy, ninety six percent of over a million who commented.

I've heard criticism lately of the "click-and-vote" approach to public input (utilized by both sides of any issue), and I respect your agency's desire for quality input. I don't deny that you received many form letters and "prepackaged" postcards during the earlier go-round that you found relatively useless, but I still take issue with the argument that public input wasn't good enough, wasn't local enough. (Individual, Helena, MT - #A20343.10152)

[Q2] Answer: It is incumbent upon the Forest Service to match the public involvement process to the scope of the issues. Where issues of national import, such as the conservation of wild areas, are on the table, the public involvement process must be national and open to all citizens. Where the issues are primarily of local concern, such as the availability of firewood, then the public involvement process is best targeted to local interests.

The Roadless Rule's promulgation clearly satisfied any rational test for sufficient opportunity for public involvement. The Roadless Rule garnered more comment than any other Forest Service decision in

history. The combination of over 600 local public meetings combined with national media exposure ensured that anyone with an interest in Roadless Area protection would have an opportunity to learn about the Forest Service's proposal and comment upon it. That over 1.58 million people chose to do so is testimony to the outreach effort. (Organization, Craig, AK - #A23228.10152)

[Q9] Again, the people have spoken. There were two years of well-publicized, well-documented public hearings in which all individuals and groups had the opportunity to make their "views, values, and beliefs" about public lands known. Over 90% of the comments generated supported protection of roadless areas. I suppose we could go through that whole process all over again—but what a tremendous waste of public money, time, and energy that would be. The process itself, the most extensive in Forest Service history, is not flawed—the Bush Administration's refusal to accept the results is. (Individual, Cumming, GA - #A21156.10153)

**331. Public Concern: The Forest Service should consider that issues being raised now should have been raised during the public comment period for the Roadless Area Conservation Rule.**

**TO RAISE THEM AFTERWARD AND THEN CRY FOUL IS CONTRARY TO THE INTENT OF THE NATIONAL ENVIRONMENTAL POLICY ACT**

The Federal Register Notices states that this advance notice is intended to give the public the opportunity to comment on key issues that have been raised regarding the protection of roadless areas. These issues should have been raised during the public comment period. To raise them afterwards and then cry foul is not what congress intended when it passed the National Environmental Policy Act. (Individual, Grants Pass, OR - #A30000.20203)

**332. Public Concern: The Forest Service should consider that those who are satisfied with the status quo might not participate.**

The FS must particularly take into account that those who are satisfied with the status quo will seldom make a great effort to participate, as they believe that the current situation will continue. (Individual, Center Sandwich, NH - #A5698.15000)

**333. Public Concern: The Forest Service should consider that the Roadless Area Conservation Rule expressly includes the requirement that input be sought from state and local officials, tribes, and any other interested parties.**

What is the best way for the Forest Service to work with a variety of states, tribes, local communities and individuals in a collaborative manner to ensure concerns about roadless values are heard and addressed through a fair and open process?

This has already been adequately addressed in the final rule of the Clinton Roadless Plan. Needless to say, there has already been a fair and open process over the last two years to hear concerns on the Roadless Plan. The final rule of the Clinton Plan specifically protects tribes, communities and individuals who might have pre-existing rights to activities in roadless areas, by statute or treaty. In addition, the final rule expressly includes the requirement that the Forest Service seek input from state and local officials, tribes and any interested parties in the land management decision-making process. It is important, however, to maintain the restrictions on road construction and logging as the basic legal framework for use planning. (Individual, Olympia, WA - #A6929.10152)

**334. Public Concern: The Forest Service should list the tribes and communities that did not provide input on the Roadless Area Conservation Rule.**

The states, tribes, local communities, and the general public had ample opportunity to review and comment on the proposal. We ask that the Forest Service list the tribes and communities that did not provide input on the original process. The final Roadless Area Conservation Rule addressed many of the

views expressed during the public comment period and incorporated many of the suggested changes. (Business, Spokane, WA - #A22047.15100)

**335. Public Concern: The Forest Service should require those who want to participate in forest management decisions to contribute to forest stewardship activities.**

I believe a good working relationship between local entities and national management would involve some kind of exchange of values. Those who want to participate in management would be expected to contribute some kind of stewardship, such as trail maintenance, wildlife surveys, search and rescue teams, creating educational materials and brochures, whatever they might propose to preserve the value of the forest. (Individual, No Address - #A30157.15100)

### *The Role of the General Public*

**336. Public Concern: The Forest Service should allow all citizens full access to the decisionmaking process.**

The members of this chapter are unalterably opposed to weakening the access of citizens to the federal decision-making process, particularly as that process affects extractive industries like logging, mining, and grazing. (Organization, Davis, CA - #A21666.15120)

All sides of the issues must be given equal access to the process and equal opportunities to express their views. We hope to never again see the closed-door meetings and off-the-record deals that tainted the original rule making process. You must utilize the NEPA process as a means to make decisions, not to rubber stamp decisions already made. Finally, you must restore integrity to the agency and the process it uses. Quite frankly, the agency has a long way to go to regain the trust of any public sector, including those interests the Forest Service's leadership catered to a few months ago. They know first hand how easily strong handed politics could compromise the agency's objectivity. (Individual, Montpelier, ID - #A9058.12230)

**337. Public Concern: The Forest Service should ensure that all interested parties have the opportunity to provide site-specific input regarding individual roadless areas.**

It is unfortunate that the USFS [United States Forest Service] must be mandated by the Idaho District Court to seek meaningful comment from the citizens of the United States on how to best manage 58.5 million acres of public land. Consequently, if the USFS wishes to work with local communities, tribes, governments, and organizations in the management of this land, it is imperative that these entities be able to provide site-specific input regarding individual roadless areas, in addition to national issues pertaining to these lands. Those who wish to actively engage in forest planning and analysis should be actively encouraged by the USFS to help identify potential impacts of management decisions in rural communities. (Business or Association, Sacramento, CA - #A3681.13213)

**SO THAT, GIVEN A RECOGNIZABLE LOCAL NEED IN A SPECIFIC AREA, AN EXCEPTION TO THE ROADLESS AREA CONSERVATION RULE MAY BE PROVIDED**

If there is a recognizable local need in a specific area, then procedures for granting exception to the roadless rules may be provided. The "default" national management position should be to preserve the roadless state. (Individual, Denton, TX - #A156.13213)

### *The Role of Local/Rural Residents*

**338. Public Concern: The Forest Service should solicit and consider local input.**

We strongly encourage the Forest service to solicit, encourage and take seriously comments made by local citizens; local, county and state governmental officials; and other community leaders. This should

occur regarding all actions taken by the agency affecting the various forest management plans and areas of jurisdictions under their supervision. Local citizens, officials and community leaders often have critical “on-site” knowledge on how individual actions on Forest Service lands will affect both the local communities as well as the various resources on the land involved. (Business or Association, Elko, NV - #A20856.15100)

The Forest Service needs to solicit and understand local opinions and desires in a more complete manner. It may take active efforts at conducting opinion polls of the local population, such as was done by the Bitterroot National Forest for their fire salvage efforts. Other methods might entail developing collaborative-based decision-making groups in affected states . . . wherein different interests and skills are brought to the table to manage watersheds. The Forest Service could contract with local mediators/facilitators to run these meetings. Even though many academicians, including the Committee of Scientists, applaud the use of collaborative methods, I highly recommend talking with local professionals and citizens who have participated in these groups for their own perspective. My own experience has taught me that without clearly-defined goals, strict timelines, equal representation, and limits on judicial review, many collaborative-based solutions will end in stalemate as is typical of many Forest Service decisions. (Governor, State of Montana - #A17660.15111)

**339. Public Concern: The Forest Service should allow adequate local input into scoping and planning.**

I want to see more local input into scoping, and EIS planning. I do not like it when the Forest Service comes to me with a plan in place and gives me 4 or 5 options of what they want. Most of the time, it is not what I want. I guess it is supposed to make me feel I have given input when I have not done so. I want more local control over what happens in my area of the forest and I want it up front and not at the end. (Individual, Seiad Valley, CA - #A5092.15111)

**340. Public Concern: The Forest Service should acknowledge that local concerns have been fully and adequately considered.**

I am writing to ask that you maintain current protection of all 58.5 million areas of roadless National forest land protected during the Clinton Administration.

The Bush administration is seeking to amend the policies of the Clinton administration by saying that local interests had not been fully consulted prior to the development of the rules. This statement is a lie. In fact, NO federal regulation has EVER been based on so much local input. The Forest Service held more than 600 hearings around the country, and reviewed a record 1.6 MILLION public comments. (Individual, Bloomfield, NM - #A1606.10151)

The Roadless Area Conservation Rule was developed through the most extensive public involvement in the history of federal rulemaking or environmental review. Of the official submitted comments, 95 percent supported the strongest possible protection for remaining roadless areas. The Forest Service contends that local opinions and comments were not adequately considered in the first public process, apparently because the views of logging, mining, and mechanized recreation were minority views in that process. These special interests had the same opportunity as anyone else to make their views known. Response like that is not generated if opportunities and announcements are sparse. (Individual, Seattle, WA - #A3716.10151)

### *The Role of Special Interest Groups*

**341. Public Concern: The Forest Service should include environmental interest groups in the decisionmaking process.**

Seek response from Sierra Club, and other environmental groups. (Individual, Del Mar, CA - #A868.15121)

The Forest Service should stop preparing for timber sales that violate the rule, and they should stop collaborating to weaken the rule. They should begin a genuine defense of the Rule in court, and solicit the help of credible and publicly accepted environmental organizations. (Individual, Hatboro, PA - #A17972.12230)

#### **THE THEODORE ROOSEVELT CONSERVATION ALLIANCE**

The TRCA is one of the best conservation groups which applies common sense and not radical policies and tactics. Please listen to them and involve them in all policy making in this area. They are another sane voice who like the RMEF is making a difference for wildlife and the wild areas we love. (Individual, Boulder, CO - #A3954.15121)

### **342. Public Concern: The Forest Service should recognize that conservation organizations have the same interests as all citizens.**

#### **THAT IS, TO ENSURE GOOD PUBLIC POLICY AND PROTECTION OF FINITE RESOURCES**

I would like to say a word about these [conservation] groups, which are often spoken of as if they were just another special interest. This is a misunderstanding; they do not represent their own interests in the same sense as timber companies, for example. They have no financial stake in the outcome. They are information gatherers. Their interest is the same as that of all citizens, to ensure that we make good public policy and do not squander our finite resources. (Individual, Juneau, AK - #A23012.15121)

### **343. Public Concern: The Forest Service should consider putting environmental groups in charge of public involvement.**

#### **BECAUSE THEY HAVE A RECORD OF DOING SO SUCCESSFULLY**

The endless number of meetings that were held were fair and open. But the agency will never, in my lifetime anyway, learn to do public involvement. This won't change under Dale Bosworth/Mary Rey/George Bush and can be expected to get worse. There was a public meeting put on by the north end of the Gifford Pinchot National Forest and the Olympic National Forest. It was held in Olympia. It was poorly done, and all "sides" went home dissatisfied. Later, a local environmental group called the Gifford Pinchot Task Force obtained the mailing list and sent out a mailing to everyone and invited them to another meeting. This one was held at a local community gathering place in the rural community of Randle, Washington, on the north end of the Gifford Pinchot National Forest. The local District Ranger was invited and attended. There was a panel composed of a very diverse constituency. A lively discussion ensued. The Task Force even offered to assist local community members in writing their response to the draft RA rule—knowing that many of these folks did not agree with them. Perhaps one should put environmental groups involved in Forest Service public involvement. This was not the first time such groups had to take the lead on broad public involvement and did it successfully. (Note: the public involvement meetings for the new NFMA regulations were even worse.) But, again, public involvement occurred in spite of this and through way over one million letters, cards and emails. The American people felt heard (until now). (Individual, Olympia, WA - #A4503.14200)

### **344. Public Concern: The Forest Service should exclude environmental interest groups from the decisionmaking process.**

#### **ENVIRONMENTAL STAKEHOLDER COUNCILS**

Remove environmental stakeholder councils immediately and remove seed money or grant money that is given with strings attached. The Forest Service should rely on local input and local control. (Individual, Albuquerque, NM - #A10497.15000)

### **345. Public Concern: The Forest Service should not pander to environmental interest groups.**

There seems to be something dreadfully wrong when advocates for the preservation of public and private resources (retaining for posterity) have more influence over our government agencies and the

legislation than do the majority of the citizenry. The problem with the preservation segment of our society is that they will not be able to make a living if they cannot make a living off of the paranoia of a few misguided supporters. Human life, the ability to make a living and enjoy our natural resources is the framework on which this country was built. Roadless areas are part of the continuing saga of bureaucratic government control that continues to lead to improper use of our renewable resources. I assume that preservationists would like to see dinosaurs roaming the earth. (Individual, Warren, AR - #A9095.15120)

We must point out that pandering to preservation interests has not worked in the past and will not work in the future. When you are conducting forest planning in a responsible manner aimed at management of forest resources, you will have the support of IFOA. IFOA recognizes that we have a big stake in responsible management of national forests. (Business or Association, Coeur d'Alene, ID - #A15260.15120)

I am convinced the anti-forest use movements are movements of greed and selfishness. This was well illustrated by [a representative] of the Environmental Protection Information Center in Garberville, California. He was quoted in a recent *Backpacker* magazine article as saying, now that the Headwaters is preserved, "We need to be conservative and not throw the gates open to everyone." In other words, now that we have created our own private preserve, let's make sure no one else gets in.

A while back, on the Discovery Channel, I saw a program dealing with the Cold War and, more specifically, the roles the CIA and KGB played in the Cold War. The elder President Bush, a former CIA Director, was on the program. A former high-ranking KGB official was also on the program. The latter said the *KGB used the West's environmental movement*.

Just think of the implications of these statements. Could there be some relationship to PETA, ALF, ELF the Eugene, OR and Seattle, WA anarchists, Earth First!, and so on? Could these be indicative of a fundamental shift toward a more socialist American society? I have to wonder.

I am convinced the environmental community is holding the federal government hostage. They get what they want because the federal government routinely caves in to tree-sitting, tree spiking, etc. (Individual, No Address - #A25635.15121)

#### **BECAUSE THEY WANT TO LOCK OUT THE MAJORITY FROM PUBLIC LANDS**

The environmental radical movement has latched onto watershed, wildlife, and scenic value protection to lock out the majority of the nation for enjoyment of their lands. Urban dwellers who are sending in thousands of cards are uninformed on the resilience of nature and how special characteristics can be protected while allowing roads and motorized use. (Individual, Alturas, CA - #A28581.15121)

I have attended many USFS meetings and am appalled that "conservation" and "environmental" groups advocate non-use of national forests. At the Regional meeting held in Atlanta, GA. those groups advocated zero timber harvest, zero mining, zero grazing, and zero "motorized" use of national forests. They said they wanted all roads "decommissioned and obliterated," private property owners (inholders) bought out, and the lands proposed for Wilderness designation. This is totally unacceptable and inappropriate for national forest lands. They were established, by the US Congress, to "meet the needs" of the American people. That means ALL the American people, not just them, and includes natural resource production. (Organization, Three Rivers, CA - #A28739.15121)

### **346. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule was orchestrated by environmental groups.**

The initial rule making, orchestrated by giant environmental organizations, was designed to lock up in perpetuity over 60 million acres of national forest lands in one massive land grab. To gain public support for this radical move, these groups targeted urban areas with misinformation and input drives, making the massive lockup appear overwhelmingly supported by the American people. Most of this input came from well meaning folks who didn't have a clue as to where these units were or what was on them. In fact, no one knew with any certainty where they were or what the trade-offs were. This strategy pitted

the interests of rural Americans in the sparsely populated areas where most of our national forest lands are actually located, against urban America, where much of the population and political power lies. (Individual, Lewiston, ID - #A2872.15121)

Remember, the huge amount of input on the first go around for the Clinton Roadless Area, was supplied largely by preservationists through mass e-mailing. There really is a silent majority out there and the Forest Service should not always try to grease the squeaky wheel, which was the case in the Clinton administration (or lack of administration). (Individual, Aloha, OR - #A3675.15121)

I have not answered the individual questions of the survey because I don't think I have anything specific to add to the response of the Retired FS Employees. I would just like to make one point and reinforce another. I am happy to see the Forest Service reviewing the Clinton Roadless proposal. It was a closed door deal made with selected "environmental" groups which was a done deal by the time it was announced. Most of us realized that even as we participated in the public comment process. The result was another step in the process to turn all the national forests into ad hoc wilderness. (Individual, Greensboro, NC - #A5306.15121)

In oversight hearings held by the U.S. House Resources Subcommittee on Forests and Forest Health, Subcommittee, it was found that the Heritage Forest Campaign, created by the National Audubon Society form more than \$3.5 million in tax-free grants from the Pew Charitable Trusts organized a coalition of environmental groups, including The Wilderness Society, the Sierra Club, and others, for the purpose of influencing future management of approximately 60 million acres of national forest lands. Based on the analysis of thousands of documents obtained from the past Administration and the agency, the House Subcommittee concluded that a handful of environmentalists in the Heritage Forest Campaign had unprecedented, and possibly illegal influence on the past Administration. These individuals had continuous access at all levels to the Federal employees that were directly involved in the creation of the RACR. This access was not limited to meetings, which were numerous, but included the providing of draft language, legal memoranda, and survey research data to the Administration, which was then used to develop and justify the roadless initiative. (Organization, Salt Lake City, UT - #A15263.15121)

[From Attachment 2] On October 28, 1999, the Committee on Resources requested documents from the Forest Service and the White House concerning the President's initiative to restrict use on 40 to 60 million acres of "roadless areas" on the National Forests. Staff has to date received, and conducted a preliminary review of, thousands of pages of documents provided by the Administration.

A preliminary review of these documents reveals that the Administration's decision was made improperly, in apparently violation of the due process rights of affected parties, as well as applicable statutes enacted by Congress to protect those rights, such as the Administration Procedures Act (APA) and the Federal Advisory Committee Act (FACA).

Information received in response to the document request indicates that the Administration's roadless area initiative was developed in an environmental vacuum—with virtually all input coming from a select few in the environmentalist community.

These individuals had continuous communication with, and access to, the Federal employees that were directly involved in the creation of the rule-making.

This access was not limited to meetings, which were numerous, but included the providing of draft language, legal memoranda, and survey research data to the Administration, which was then used to justify and frame the roadless area rule.

The structured relationship between the Administration and environmentalists is of serious concern, but more significant is the lack of any evidence of even a token effort by the Administration to involve other interested parties. This disregard for any balance in the advice being solicited is evidence of both the pretextual nature of the decision, which had clearly already been made, and of lack of concern for any adverse consequences on the affected users of the forest lands in question. (Individual, East Helena, MT - #A20422.15121)

**347. Public Concern: The Forest Service should not use environmental groups as moderators in the public involvement process.**

In my experience so far with HCCA, which seems to have assumed the role of gatherer of community input, there is anything but transparency, willingness to allow discovery, and open-mindedness. Since the new comment period and process of gathering input is unknown to the general public has not been well publicized, there should be more effort to recruit public opinion in a nonbiased arena. Biased groups such as HCCA should not be placed in a position as moderators of this process. (Individual, Littleton, CO - #A13845.15152)

**348. Public Concern: The Forest Service should recognize that conservation groups falsely appear to outnumber those favoring responsible land access.**

I would like to point out that in recent years it has been demonstrated to me through experience that organized groups in favor of banning land access and prohibited motorized vehicle use on public lands may at times falsely appear to outnumber those in favor of maintaining access, but only for now. As one who has many personal friends and family involved in several of the conservational groups, I realize their tactics and know they have been effective in fabricating the appearance that a vast number of Americans approve of limiting land access for recreational activities. However, my own and many, many others' personal experiences tell something quite different. Given time, Americans for responsible land access and motorized vehicle use will come forth, as is evidenced by several of these groups' recent growth. We should not ignore those Americans who have yet to speak their views on this topic, for there are a vast number of unspoken voices as yet in favor of maintaining land access for all. (Individual, Salt Lake City, UT - #A27590.15120)

**349. Public Concern: The Forest Service should exclude industrial interest groups from the decisionmaking process.**

Again, in the twilight of the last remaining relatively undisturbed sanctuaries of this nation's (and part of the world's) forest ecosystem biodiversity, the notion of bringing exploitative interests into the process will at best muddy the process of protection of roadless areas, and at worst, encourage "balanced uses", effectively emptying the last in our reservoir of undisturbed forest land. The goal of Roadless Area stewardship should be bringing the best science to the single goal of preserving the last remaining tracts of forest biodiversity.

Would one bring the Band-Aid salesman, the ambulance driver, the hospital gift-shop employee, the recovery ward night custodian into the decision making process for a case of major surgery? Certainly all of these folks are personally affected, but do they have anything meaningful to offer outside of their own parochial interests when the patient is nearly terminal? (Individual, Goldendale, WA - #A21668.50100)

**350. Public Concern: The Forest Service should not pander to industrial interest groups.**

Apparently you are counting on our ignorance of what is going on, or our sheer fatigue from previous efforts to further this most important initiative, in order to promote the interests of the logging companies and mining interests who use the National Forests as their private preserves.

The reshaping of our forests by extractive industries, road-building and poor management has left them vulnerable to fire, disease and the spread of exotic weed species. We are fortunate that some of the less desirable or accessible areas have so far escaped this degradation. I ask you to listen to the voices of individual citizens, and to reread the great number of letters already in your files, and make the wise decision to set aside these areas for the sake of our children and their children. (Individual, Marshall, NC - #A13223.15122)

If it were only an issue of just "individuals and groups with strongly competing views, values and beliefs" this would simple. But it is not. This is an issue of the interests of the people versus the interests of big money. The Forest Service (and Congress and the Bush administration) would do well to

remember that the National Forests belong to the American people, not the government and not industry. Bowing to the will of special interests that are backed by industries that profit from the consumption of natural resources and destruction of natural, life sustaining processes on public lands often at the taxpayer's expense is shortsighted and inherently a conflict of interest to the Forest Service's expressed claim of "Caring for the Land and Serving the People." (Individual, Seneca, SC - #A22097.15122)

It seems that this process is slanted to benefit industry and only industry. I urge you to respect the will of the millions of individuals who have already clearly stated that we want our remaining wild areas to remain wild. Don't change the rule for the short-term gain of the logging industry and others, while creating long-term loss for people and wildlife. (Individual, Missoula, MT - #A19233.15122)

### **351. Public Concern: The Forest Service should include special interest groups in the decisionmaking process.**

#### **LOCAL AND NATIONAL ORGANIZATIONS**

Brundage feels that the solicitation of input from user groups, such as the Forest Service is doing by means of this July 12, 2001 request, is the best and appropriate means of ensuring that all of the various interested parties have an opportunity to be heard and participate in this process. This should include local as well as national organizations, such as the National Ski Areas Association (NSAA). National organizations are often able to provide broad, nationwide direction and concerns that local organizations sometimes overlook. (Permit Holder, McCall, ID - #A15317.15162)

#### **OUTFITTERS AND BACKCOUNTRY GUIDES**

More information could be obtained from outfitters and guides already in the backcountry than from forest service employees riding around in trucks on roads. I know this for a fact because I have been in the capacity of guide and outfitter and have seen the activities of the forest service; their range is too limited off road to be of much value to conservation. (Individual, Howell, MI - #A13742.14000)

#### **OFF-ROAD VEHICLE USERS**

I believe it is important to point out that ORV users have been unfairly singled out as the single cause of environmental damage on our public lands. All across our nation, public lands are being closed off to ORV users while hiking, backpacking, equestrian, bicycling, and in some cases even ATV access has been maintained, expanded, and encouraged. No other group of users has come forth and assisted in the cleanup and maintenance of public lands like ORV users have yet they still continue to be much-maligned and subsequently denied access. I personally consider this to be a mockery of the founding principles of our great country. The public lands are to be protected for the people, not from them.

Despite having representative organizations all across the nation, ORV users have often been left out or ignored in the planning process for public land use. (Individual, Saint Louis, MO - #A629.15123)

### **352. Public Concern: The Forest Service should exclude special interest groups from the decisionmaking process.**

#### **STAKEHOLDER COUNCILS**

Stakeholder councils should be removed, and plans should be submitted by local users to local jurisdictions, whereby citizens of those jurisdictions can legally vote to approve the plan they feel best represents a balance of resource development and protection. (Individual, Aptos, CA - #A16303.15111)

## *Collaboration Processes*

### **353. Public Concern: The Forest Service should adequately incorporate collaboration in the decisionmaking process.**

Assertion: NFMA is a "highly collaborative process" (p. 3). Were this true, it would have, analytically, no bearing on whether that process failed systematically to account for the cumulative, national level

impacts of roadless area conversion and road system expansion. In point of fact, NRDC is aware of no study that demonstrates actual collaboration in the planning process, as opposed to simple comment opportunities. Moreover, our organizational experience has virtually uniformly been that, far from collaborating, national forest decision-makers routinely refuse even to consider the management alternatives suggested and substantiated by citizen activists, giving the public no "horse in the race." (Organization, Olympia, WA - #A20145.15150)

**354. Public Concern: The Forest Service should allow flexibility in collaboration processes.**

The Forest Service can also serve an important function in brokering agreements over the use of Forest Service lands for energy production. As an example, the amended rule should include the flexibility for all parties to enter into collaborative agreements that benefit the forest. This could include offsets for surface disturbance (i.e. an acre disturbed on the forest will be offset with reclamation of disturbance in another part of the forest as agreed upon by the parties). The net result is that when the mine reclaims the surface disturbance associated with the operation, as is required by state and federal law, the forest will benefit from not only the reclamation associated with the mining operation, but with the offset reclamation done in another part of the forest. The same principle could be applied to wildlife habitat or other important facets of forest management. (Business, Wright, WY - #A23085.15162)

**355. Public Concern: The Forest Service should place limits on the number of active collaborative groups that operate regionally, on a concurrent basis.**

The USFS must place limits on the number of active collaborative groups it operates regionally, on a concurrent basis. Presently, contributing volunteer members of multiple, concurrently active collaborative groups find themselves "coming and going", especially in situations involving multiple national forests and lower population density rural counties in and around those national forests. (Organization, Moscow, ID - #A15318.15162)

**356. Public Concern: The Forest Service should follow the model of collaboration used in other planning processes.**

**THE COLLABORATIVE STEWARDSHIP PROCESS USED BY THE CHUGACH NATIONAL FOREST**

The collaborative stewardship process used by the Chugach National Forests in its Forest Plan Revision provides an excellent model for meeting this objective. An important element of this effort is that a public survey was completed to verify that the attitudes of local residents were relatively consistent with the input that was being received by those who actively participated in the planning process. (Organization, Anchorage, AK - #A17358.15111)

**THE WINIGER RIDGE ECOSYSTEM MANAGEMENT PILOT PROJECT**

Instead of thinking in terms of the good guys and the bad guys we may come up with a very different philosophical understanding based on our observations of nature. In our area there is an effort that may serve as a helpful model of agencies, Forest Service, local landowners and environmentalists working together to become informed and create a situations where certain areas might be protected in a more natural state and in other areas of greater wildfire risk to landowners people are taught and offered a variety of means for protecting their homes and property. It is called the Winiger Ridge Ecosystem Management Pilot Project. (Individual, No Address - #A4477.15162)

**THE ENLIBRA PROCESS FOR TAKING ACTIONS IN THE WEST**

If the Fed wants to take actions in the West (just like it does back East), it needs to use as model the Enlibra process as outlined by Western governors. Here in Western Colorado, citizens have been doing just that with our regional Public Lands Partnership. In fact, our regional collaborative process is hosting a conference, Communities Engaged in Public Land Planning: Setting the Course for the Future (see <<http://www.fs.fed.us/r2gmug/>>). I invite you to attend. (Elected Official, San Miguel County, CO - #A4549.15152)

**357. Public Concern: The Forest Service should recognize that groups unwilling to collaborate have no legal standing.**

The Forest Service can effectively work with interests of competing values by requiring that they work collaboratively in the process. If they are not willing to sit down with other interests and work out a solution then they have no standing legally. (Business or Association, Sandy, UT - #A15656.15162)

**358. Public Concern: The Forest Service should avoid over-reliance on collaboration.**

**TO AVOID DISPLACING TRADITIONAL SOURCES OF LEGITIMACY, SUCH AS THE ELECTORAL PROCESS OF REPRESENTATIVE DEMOCRACY**

Popular ideas, such as collaboration, may not always be as good as they seem. Currently, popular ideology suggests that public agencies should shape public policy by relying on collaboration among local stakeholders. While collaboration has its appropriate uses, over-reliance on it can displace traditional sources of legitimacy. For example, agencies that have derived their legitimacy from the electoral process of representative democracy would be forced to secure a direct sanction from parties affected by the use of the collaborative process.

The collaborative process requires stakeholders of a community to seek agreement on the resolution of their dispute. Some proponents of the collaborative process believe that it entails finding stakeholders who have the power to make commitments to support an agreed upon solution, as well as persuading any of their followers to do likewise. Generally, the government is expected to embrace the agreed upon policies. This idea is being advanced particularly in the context of decisions that are made by land management agencies like the Forest Service. In the case of the roadless rule, the Bush administration is applying this concept to a policy decision of national scope. (Organization, Nevada City, CA - #A4941.15111)

**TO AVOID CREATING POLICIES THAT ARE MERELY AGREEABLE RATHER THAN HIGH QUALITY**

Local collaborative efforts shift the ultimate goal away from reaching a quality decision and move it toward reaching a merely agreeable one. Such a process can lead to policies that are based on cumbersome compromises of principles, the lowest common denominator, and on the most tractable but least important issues. In essence, collaboration can actually inhibit genuine innovation. (Organization, Plymouth, MN - #A7116.15000)

**BECAUSE IT IS LIMITED TO SOLVING EASY PROBLEMS**

As a long time participant in collaborative processes (which are good) they are limited to solving easy problems, and thereafter they stall when no consensus can be found to deal with fundamental problems. (Organization, Arcata, CA - #A21665.15162)

**BECAUSE AGREEMENT BETWEEN PARTIES MAY NOT BE POSSIBLE**

You are on the right track with your request for response on the roadless issue rather than the Clinton/Gore process, which everyone knew was a scam. Your questions are thoughtful and if responded to honestly, with real concern for the roadless areas by all parties, should give you a good basis on which to make your decisions. The process can be considered democratic but it is not a popular vote. You will never get anything close to agreement from all the stakeholders on the roadless question because the views are so polarized and strong. In the end the USFS will have to make the tough choices based on what is best for the forests themselves and the flora and fauna that live there, tempering that decision on what impact the choice made will have on man. In my opinion, local communities matter more than national environmental organizations on these matters. Impact on man matters at least as much as impact on other living things. You are having an open process now but it may not be possible to have a collaborative process. Take the Tongass National Forest for instance. Years of negotiations on the Tongass Land Management Plan produced a plan that took away most of the forest for timber production, but assured a small steady supply of timber for small business to manufacture forest products. Some roadless areas were open for harvest with aerial extraction. After the TLMP was put into place these same groups sued to stop the logging in the roadless areas and along comes the Clinton/Gore roadless plan and proclaims no logging at all allowed in the roadless. What god did all the good faith

collaboration do here? None at all. That is why in the end the USFS must make the decision and be supported by the legislative and judicial branches of the government. It is the only way. (Individual, Portland, OR - #A15710.15111)

**BECAUSE IT GIVES RESOURCE USER INTERESTS UNFAIR INFLUENCE IN DECISIONMAKING**

Local collaborative efforts have become little more than big group hugs where the stakeholders, mostly development interests, may feel warm and fuzzy all over but leave forests, fish, and wildlife out in the cold. The Quincy Library Group (QLG), a local consensus building group charged with developing a management plan for three National Forests in the Sierra Nevada, is a case in point. Most theorists agree that all stakeholders with a real interest in the outcome ought to be members of the collaborative group. But in rural communities, like those in the Sierra, such a broad representation of voices is not always feasible. Many environmentalists with an interest in the QLG are based in the urban centers of San Francisco and Los Angeles, making it difficult for them to attend regular meetings. Consequently, the QLG was largely dominated by Sierra Pacific Industries, the very timber company that would be awarded logging contracts on the Lassen, Plumas, and Tahoe National Forests. As a result, the QLG recommended a plan that would double the logging in those forests, push imperiled species such as the California spotted owl, Pacific fisher, American pine marten, wolverine, and northern goshawk closer to extinction, and create fuels management programs that would actually increase fire severity and risk to nearby communities. More often than not, local collaboration means big timber, mining, oil, ranching, and other development interests call all the shots. (Individual, Cottage Grove, OR - #A27337.15122)

**BECAUSE THE TIME COMMITMENT IT IMPOSES MAKES IT AN UNREALISTIC SOLUTION**

I have read several texts about collaborative stewardship and attended training sessions, some sponsored by the Forest Service. While an inspiring ideal, collaborative processes require an extensive time commitment difficult for citizens to maintain in today's world. There are several key ingredients required for success, such as a skilled impartial moderator, a diverse group of stakeholders willing to listen to each other, and commitment by leadership to implement the recommendations of the collaborative group. Because these are difficult requirements, I do not think it is realistic for the Forest Service to prescribe collaborative processes across the nation as a solution to conflict. (Individual, Sitka, AK - #A15506.15162)

**359. Public Concern: The Forest Service should consider that collaboration cannot occur until those who are party to litigation over the Roadless Area Conservation Rule recognize the authority of federal acts.**

The State of Idaho is suing the Forest Service over the Roadless Rule as well as the Fish and Wildlife Service over the reintroduction of gray wolves. The Forest Service should work with groups (including governments) that are willing to accept federal authority. Until the State of Idaho (and others involved in Roadless Rule lawsuits) recognizes the authority of federal Acts (ESA, NFMA, NEPA, CWA, etc.), there can be no "collaboration." (Individual, Lewiston, ID - #A29569.15162)

**360. Public Concern: The Forest Service should recognize that the term "collaboration" carries the connotation of bias in decisionmaking.**

Everyone must have equal access to the process and equal opportunity to express their views. We hope the back-room deals at the national level, which marred the initial rule making, are things of the past. The word "collaboration" carries a negative connotation, one of cozy deals and distorted information favoring one point of view or another. Decision makers must maintain their objectivity and assure a lack of bias in data collection and its use. The image of your agency has been badly tarnished by real or perceived coziness with special interest groups. The NEPA process was corrupted in the rush to complete massive national initiatives before the last administration left office, becoming a means to confirm decisions already made. The Forest Service as an agency will have to prove its professionalism before re-earning the public's respect, especially at the local, adjacent community level. (Business, Lewiston, ID - #A7991.15110)

## Collaboration with State and Local Governments

### 361. Public Concern: The Forest Service should collaborate with state and local governments in managing roadless areas.

I hope and pray agreements can be reached between states and the USDA-Forest Service regarding roads and roadless areas. (Individual, Roy, UT - #A1655.12310)

The MCD would recommend that the process be re-opened but this time at the local forest level. As a procedural law, NEPA provides opportunities for the public input in federal land planning activities. The process allows for all citizens to participate, yet recognizes the importance of state and local government involvement. Locally elected officials (County Commissioners and District Supervisors in Wyoming) directly represent the people that live in the areas of the several national forests. By allowing and supporting the meaningful involvement of local and state government the Forest Service will surely obtain the information they seek concerning roadless values. These types of relationships should be the focus of the Forest Service planning efforts and local Forest Supervisors should be allowed and encouraged to continue and increase these working relations with state and local governments whose constituents are affected by these decisions. (Conservation District, Meeteetse, WY - #A17665.12313)

#### BY RESPECTING STATE REGULATORY AUTHORITY

Any rule governing roadless area management should provide for close collaboration with state governments. Congress has provided that States are to have a meaningful opportunity for participation in the forest planning process. 16 U.S.C. [section] 1612(a). In addition, the States' role within the federal system demands that management decisions respect the sovereign concerns of the States as the trustees of natural resources such as fish, wildlife and water. The States' authority to regulate environmental conditions also must be respected, especially as it relates to water quality. Congress has mandated that federal land management activities must comply with state water quality regulations. 33 U.S.C. [section] 1323(a); *see also Oregon Natural Desert Ass'n v. Dombeck*, 172 F.3d 1092, 1098 (9th Cir. 1998) ("Section 1323 plainly applies to nonpoint sources of pollution on federal land"). Collaboration during initial rulemaking can help prevent future conflicts and will promote the mutual goal of cooperative federalism.

Collaboration with state governments is especially needed in those situations where state lands are adjacent to, or intermingled with, national forest lands. While access to intermingled state lands is guaranteed by existing statutes, such access can be hampered by restrictive management prescriptions that do not provide, up front, for future road construction necessary to reach state inholdings. By working together, the state and federal government can build state access requirements into the forest land planning process, so that future access is expedited. (Governor, State of Idaho - #A20141.15130)

#### BY CREATING A STAFF POSITION FOR A STATE LIAISON

Forests should make available, on their staff, a position that is appointed and paid for by the state's governor. This position would participate in planning meetings, inspections and other activities and serve as a liaison between the governor's office and the National Forest. The incumbent in this position would give input and make recommendations to the Forest but would not have approval authority.

This would show a strong commitment by the Forest Service to consider the state's economic and social needs concerning Forest policy. (Individual, No Address - #A26264.15130)

#### BY ESTABLISHING A STATE OVERSIGHT TEAM

If roadless rulemaking is to legitimately proceed, we recommend that the Forest Service establish a state oversight team that can participate on a regular basis in future rulemaking. A good beginning model for such a team is the Interagency Team that had significant input into the promulgation of the Roadless Rule. A committee of state representatives could be established that would meet regularly with Forest Service personnel working on roadless issues to review work and suggest revisions or alternative approaches. Such a process could give the States a real voice in this important issue without intruding on the Forest Service's statutory authority to manage and preserve our National Forests. (Governor, State of Idaho - #A20141.15162)

**362. Public Concern: The Forest Service should designate specific entities as cooperating agencies.****STATE OF MONTANA**

I again ask that the Forest Service designate Montana as a cooperating agency under NEPA and 40 C.F.R 1500-1508. After careful consideration, we believed that it was vitally important to the resources within Montana and our communities that we assume that role. We continue to subscribe to the view. (Governor, State of Montana - #A17660.15131)

**STATE OF WYOMING, COUNTY COMMISSIONERS, AND CONSERVATION DISTRICTS**

We feel that the State of Wyoming, County Commissioners and Conservation Districts should be given cooperating status at the earliest time. (Conservation District, Sublette County, WY - #A28888.15141)

**WESTERN STATES**

In order to establish an effective forest planning process at the local level the Forest Service must be willing to work cooperatively with the appropriate and necessary stakeholders. The Forest Service should grant Western States cooperating agency status under the National Environmental Policy Act (NEPA). This cooperative effort will allow local resource managers to undertake stewardship activities such as forest thinning that will return the forest to a more natural condition, reduce fire, insect and disease hazards and reduce the risks to public safety on a forest-by-forest level. (State Agency, Denver, CO - #A2332.15131)

**363. Public Concern: The Forest Service should establish a consistent system for extending cooperating agency status to local entities.**

The Forest Service needs to establish a consistent system of working with local governments, state agencies, and associations. In Wyoming, the Forest Service used a government-to-government format while giving county and state officials the impression that they had cooperating agency status under NEPA. In fact, in North Dakota and Wyoming, the extent of state and private land plus county legal interests qualify both the state and county officials for cooperating agency status. If this had been done, then the Forest Service would be required to follow appropriate agreement format so that each party understood the role and what its responsibilities were. (Organization, Denver, CO - #A21358.15130)

**364. Public Concern: The Forest Service should include western governors in the development of roadless area guidelines.**

We enclose two WGA policy resolutions regarding roadless areas, Policy Resolution 99-030 and 00-021. These resolutions state that Western Governors should be included in front-end development of guidelines implementing roadless plans and that collaboration by the federal government with the states is important in making sound land use decisions. (Association, Denver, CO - #A19392.15153)

**365. Public Concern: The Forest Service should revise federal regulations.****TO BETTER SOLICIT INPUT AND COOPERATION FROM STATE AND LOCAL GOVERNMENTS**

The existing regulations contain provisions for Forest Service consultation with the involvement of each of the categories of persons and groups mentioned in Issue #2 at 66 Fed. Reg. 35919-20. However, the regulations don't necessarily provide the "best way" for such consultation and involvement to occur. COHVCO suggests that the following changes to the present process should be made.

First, regarding the involvement of state and local governments, the regulations are somewhat vague and therefore should be revised. The meaning of the phrase, "Contribute to the streamlined coordination of resource management plans or programs," (36 C.F.R. [sec] 219.14(b)) is not clear. The Forest Service should be required to solicit and obtain the cooperation of state and local governments throughout both the process of forest planning and the implementation of site-specific resource management decisions. Too often in the recent past have decisions made at the national level failed to include local participation to any significant degree. When this occurs, often local economies and ways of life are harmed or

destroyed. Avoiding consequences of this sort must be the highest priority of the Forest Service. (Organization, Denver, CO - #A29624.15130)

**366. Public Concern: The Forest Service should collaborate with counties in managing roadless areas.**

A very high percentage of the proposed roadless areas in our county have roads and have been managed for years. We would like to work with the United States Forest Service and manage the forest in our area to be healthy forest, including the animals, trees and the other aspects of the forest. It is important that we talk and work together because our county is 84 percent publicly owned and the county next to us is comprised of 92 percent public land.

Please believe me when I say we care about our area, but we need to be heard and be real part of the future plans. (Elected Official, Lake County, MN - #A1600.12313)

In December 1999, responding during the comment period on the Roadless Area NOI, Crook County sent a letter strongly opposing the proposed roadless rule on the grounds that the rule violates the multiple use principle upon which the Forest Service was founded and negates the forest planning process at the local level. Crook County has a land use plan in place that supports continued multiple use of the forest and identifies the involvement Crook County should be allowed in the decision making processes of federal and state agencies when actions are proposed that will potentially impact the county. (Elected Official, Crook County, WY - #A15545.50200)

The appropriate role of local forest planning regarding the Roadless proposal is to ensure compliance with all laws and regulations. The National Environmental Policy Act (NEPA) and the Council on Environmental Quality (CEQ) regulations are the key federal law and regulation. The pending Roadless proposal is under NEPA and its CEQ regulations. Sierra County Commission requested last year to be a partner in the Environmental Impact Statement process. Unfortunately, Sierra County Commission did not receive any response regarding our request pursuant to 40 CFR 1506.2. Hence, the appropriate role of the Forest Service is to follow the rules and procedures of NEPA and CEQ, and request that the State and affected counties be involved, government-to-government, in the environmental analyses and documentation. (Manager, Sierra County, NM - #A22059.20203)

**367. Public Concern: The Forest Service should consider that consultation with other agencies, states, and American Indian tribes was not complete prior to issuance of the Roadless Area Conservation Rule Final EIS.**

The FEIS fails NEPA by not providing a full disclosure of potential impacts to the public. Consultation with other agencies, states, and Indian tribes was not complete prior to issuance of the FEIS. (Professional Society, Anchorage, AK - #A21707.10131)

**368. Public Concern: The Forest Service should *only* notify states and American Indian tribes of pending federal actions.**

Of the groups listed above, the only ones which should receive special notification of pending Federal actions and who should be asked for their advice and counsel are the tribes, and to a lesser degree, the States. Special emphasis must be placed on tribal wishes for the lands. (Individual, Grangeville, ID - #A830.15130)

**369. Public Concern: The Forest Service should make collaboration a goal of the public involvement process at the local level.**

**RATHER THAN AT THE NATIONAL LEVEL**

The problem with collaboration is that it is difficult to achieve on a National level. The present rule does not consider individual area problems or any type of cooperative solutions. Collaboration should be a

goal of the process at the local level in developing the areas as well as solutions to issues and management guidelines. (Business, Nevada City, CA - #A11695.11120)

**BY ENCOURAGING LOCAL GOVERNMENTS TO HELP IDENTIFY IMPACTS ON RURAL COMMUNITIES AND OTHER LANDOWNERS**

States, tribes, and local governments who wish to actively engage in forest planning and analysis should be encouraged to help identify the potential impacts on rural communities and other landowners. (Elected Official, Boise County, ID - #A4889.14000)

**BY ASKING LOCAL GOVERNMENTS TO PROVIDE THEIR PREFERRED MANAGEMENT PRESCRIPTIONS FOR NATIONAL FOREST SYSTEM LANDS WITHIN THEIR BORDERS**

Each incorporated village, town or city with a functioning government that has national forest lands within its borders should be asked to provide, through statute, its preferred management prescriptions should be binding on forest service managers in so far as they do not prevent national, state or county mandates from functioning.

Tribes, organizations and individuals should be asked to provide local knowledge, expertise, preferences and ideas to their state, county and local government as well as directly to national forest planners. (Individual, Ketchikan, AK - #A23219.13200)

**BY FOSTERING ADEQUATE DIALOG BETWEEN FOREST SERVICE MANAGERS AND LOCAL GOVERNMENT OFFICIALS**

Seeking the input of local governments and its citizens adjacent to the national forests as to the best means of protecting the surrounding environs is a critical responsibility of the Federal Government. Last year we witnessed in New Mexico how a well-intended effort to eliminate hazardous material in a national forest had a devastating impact on the lives of many citizens who lost their homes to uncontrolled forest fires. Better dialog between forest service managers and local government officials might avert such a disastrous policy. (Organization, Huntsville, AL - #A13542.15111)

**370. Public Concern: The Forest Service should recognize that revisiting the Roadless Area Conservation Rule ignores collaboration that has already occurred at the local level.**

We spent years negotiating and crafting this policy. We debated and compromised with the environmental organizations and the operators of sawmills, local loggers, paid representatives from the big extraction industries, and committed citizens such as myself. I do not want our hard work ignored and thrown out by a new administration. We have worked too hard and too long to be treated like children. We deserve respect. We earned it through many hours of hard work, research, and discussion. (Individual, No Address - #A12834.10150)

**371. Public Concern: The Forest Service should create policies and teams to work with state and local authorities in putting into place “right to manage” laws.**

**TO PROTECT THE FOREST SERVICE FROM LITIGATION**

Policies and teams should be created to work with state and local authorities to put in place similar “right-to-manage” laws and ordinances to effectively protect the Forest Service (and all public land management agencies) from litigious fools who expect life to be a bed of roses from which the government has removed all the thorns. Unfortunately, just as right-to-farm laws do not protect farm owners from the carelessness or indifference of neighbors “living the country lifestyle” who allow pets to harass livestock, who vandalize crops and machinery, who destroy crops through inappropriate or unattended burning of trash and yard debris, and who damage crops through careless or improper use of pesticides, right-to-manage laws will not protect forests from their neighbors. (Individual, Dallas, OR - #A3697.70110)

**372. Public Concern: The Forest Service should have an agency representative attend community meetings.**

[Question 2] Making sure that the Forest Service is present at community meetings and activities, council meetings such as the Great Falls Conservation Council. But always remember that you represent the nation at large and the future. (Individual, No Address - #A17946.14200)

*Collaboration with Agencies*

**373. Public Concern: The Forest Service should collaborate with the U.S. Fish and Wildlife Department.**

Requirements to consult with Fish and Wildlife Personnel and to monitor species need to be maintained, and the importance of scientific input into important Forest Service decisions can't be overestimated. (Individual, Decatur, GA - #A19228.12312)

**IN FOREST PLANNING**

Every year each department has a new management plan on how to manage wildlife and for the life of me I can not understand why wildlife departments and forestry departments can't work together towards a plan that each knows about and jointly oversee the projects within our public forests. As the current system exists it is the animals that suffer every time the plan changes, which in my point of view is way too often. Make up a good plan and stick to it. (Individual, No Address - #A771.15141)

Those who have the knowledge of these areas should be responsible for forest planning. Groups to put forward input should be the forest service, fish and wildlife and ecology departments. (Individual, Olympia, WA - #A286.15100)

**IN MANAGING ROADLESS AREAS**

Forest Service with help from fish and game should protect roadless areas (they may have to restructure some debts, etc). Keep congress and big business out of it, they are part of the problem. (Individual, Bozeman, MT - #A665.12120)

**374. Public Concern: The Forest Service should explain its relationship with the U.S. Fish and Wildlife Department.**

We had hoped that President Bush's Administration would restore the Forest Service to its historic work, which benefited all of the people living in and working on Federal lands. Now we understand that the Forest Service now has to work in submission to the National Fisheries and Wildlife Service.

When will citizens (human beings) be considered in all this morass? (Individual, Boise, ID - #A2541.12200)

**375. Public Concern: The Forest Service should collaborate with other agencies in managing roadless areas.**

Though wildfire is a unique phenomenon—can we not try to make interagency cooperation a given in preserving the contiguity of roadless areas (for existing values and ones that may not yet be even clearly formulated) in the same spirit we all come together to fight a fire? (Individual, Craig, AK - #A778.12310)

The forest service should work with all agencies—the Interior Department, the Corps of Engineers, the BLM, and the US Park Service—to coordinate efforts and protection wherever possible. It should invite all parties (government, private and public) to create workable common goals. It should do whatever is necessary to keep all parties involved along the way. (Individual, No Address - #A29275.15160)

## *Collaboration with Other Groups*

### **376. Public Concern: The Forest Service should ensure adequate collaboration with diverse groups.**

#### **BY EXPLAINING LAWS AND HOW THEY APPLY TO DECISIONMAKING**

The Forest Service can work with groups whose views and values are at odds by first explaining to them, and making their decisions based on, the laws as outlined in the National Forest Management Act and Multiple Use Sustained Yield Act, laws that mandate balanced management of all resources and preservation of biological diversity throughout the national forest system. If the U.S. Forest Service makes their decisions based on these acts of law and not due to political and local pressures of groups who usually have their own personal agenda, then there should be no difficulty in carrying out their responsibilities of managing our forest lands. (Individual, Port Angeles, WA - #A1044.20200)

#### **BY ARRANGING FACE-TO-FACE WORKING GROUPS OF ALL INTERESTS**

Arranging face-to-face working groups of all interests is the most effective way to develop a consensus. Working groups were used during the 1975 Unit Planning process on the White Mountain National Forest. Each group of 10-15 people represented the range of interest groups and met for 4-6 weeks to come up with joint recommendations on 30-40 issues. Working face to face produced much more civil and constructive results than other forms of public input. (Individual, No Address - #A17292.15000)

#### **BY BRINGING TOGETHER A CORE GROUP FROM VARIOUS INTEREST GROUPS TO DRAFT SOLUTIONS**

The best way to work together on this ruling is to go through the NEPA process and form a core group from the various interest groups that will attempt to draft solutions and guidelines for accomplishing them. (Business or Association, Princeton, ID - #A27994.20203)

### **377. Public Concern: The Forest Service should create a Board of Trustees.**

#### **TO OVERSEE MANAGEMENT DECISIONS, MONITOR ENFORCEMENT, AND ENSURE ADHERENCE TO WELL-BALANCED PRINCIPLES**

Create a Board of Trustees that would oversee the writing of Forest Service regulations, monitor enforcement, and review decisions made by Forest Service executives to ensure continuing adherence to well-balanced principles devoted to the public interest. Such a board should consist of representatives of all interested groups including us taxpaying owners of these public lands. (Individual, Loveland, CO - #A9080.15162)

### **378. Public Concern: The Forest Service should create partnerships that are inclusive of all economic levels.**

Much of past FS direction has been to favor commodity driven consumptive interests such as grazing, timbering, to some degree mining, and agricultural water systems. In more recent times the FS has formed quasi-partnerships with various recreational interests such as back-packing, horse-packing, helicopter supported activities, snowmobiling, ORVing, and Ski Industry activities. The clientele served by these partnerships are generally from the middle and upper incomes. The FS should form a partnership that would be more inclusive for all economic levels. (Individual, Salt Lake City, UT - #A19068.15120)

### **379. Public Concern: The Forest Service should respect the role of the Continental Divide Trail Alliance.**

It is our hope, that regardless of the decision over the Roadless Area Conservation Rule that the Forest Service and other land management agencies will respect the unique and critical role that the CDNST plays in our public lands. (Organization, No Address - #A30183.12120)

**380. Public Concern: The Forest Service should employ advisory committees.**

During the process, issues may surface that warrant an advisory committee to recommend an alternative to the interdisciplinary team, but we see no reason to superimpose such as advisory process as a matter of policy. Nor do we see the need to provide concerned parties with “special” accommodations outside the purview of the participating public. If advisory committees are employed to review the concern, the committee should be composed of individuals representing regional and national interests as well as those representing local interests. (Organization, Damascus, VA - #A17723.15110)

**RESOURCE ADVISORY COMMITTEES**

The NVWF [Nevada Wildlife Federation] stands ready to meet with the USFS at a local level and we would find people to sit on a RAC should you start one. We have members on every BLM RAC at this time. (Organization, Reno, NV - #A8730.12300)

USFS needs to bring all locals to the table. In Nevada, USFS has a seat at the table on the BLM RAC and that is great. USFS could even start their own resource advisement committee (RAC). (Organization, Reno, NV - #A8730.12300)

**381. Public Concern: The Forest Service should accept the cooperative behavior between special interest groups as evidence of collaboration.**

I feel that we have already proved that we are able to work together on access to the mountains. We formed a club called the Central Utah Multiple Use Club. We have directors from every avenue. We address hikers, bikers, truckers, ranchers, cabin owners and many others. I also belong to a three-county Access Management group. We openly discuss all issues. Why should the comments you receive be the only collective proof of collaboration? (Individual, Las Vegas, NV - #A26123.15160)

**382. Public Concern: The Forest Service should collaborate with the Mono Collaborative Planning Team.**

The Roadless Conservation Rule is a significant policy decision warranting the collaborative process of 64 FR 54074. As our comments of July 2000 emphasized, tribal governments, and local, regional, state and federal agencies in the Eastern Sierra have formed Collaborative Planning Teams (CPT) to facilitate such collaborative processes. The Mono CPT includes both the Toiyabe and Inyo National Forests. Included in the Memorandum of Understanding establishing our Collaborative Planning Team are directives to collaborate in responding to planning efforts such as the proposed rule that have the potential to affect or direct actions of our member agencies. We request that our collaborative team be given an opportunity for genuine participation in a collaborative process to clarify the rule. The upcoming update of the Toiyabe and Inyo forest plans could provide the appropriate collaborative format for local roadless policy clarification. (Elected Official, Mono County, CA - #A18107.12310)

**Education****383. Public Concern: The Forest Service should educate the public about specific topics.****ABOUT THE IMPORTANCE OF MANAGING PUBLIC LANDS FOR THE GREATEST GOOD FOR THE GREATEST NUMBER OVER THE LONG TERM**

In local areas, such as this county, that are dominated by federal lands and in which federal subsidies have historically been significant, I would like to see the Forest Service offer informational hearings and educational outreach activities to inform citizens about the importance of managing public lands for the greatest good for the greatest number over the long term. (Individual, Portola, CA - #A695.14120)

**ABOUT THE FACTS AND BENEFITS OF THE ROADLESS AREA CONSERVATION RULE**

In order for the agency to achieve the goal it set out to accomplish it is imperative to inform the public at large of the actual facts. Currently it appears that neither the public nor the communities most closely

affected are familiar with the details of the proposal. The impression exists that these rules will pose restrictions on vast land areas when in fact only 2-3% of the total land base of the U.S. are in question.

I would like to add (based on personal experience), that once people are properly informed about the issue, strong support for protection efforts can be expected. Unfortunately, the Forest Service has neglected public information and education on this important subject—including this public comment process—which in turn might explain a 30 year long evaluation process without little progress to show for.

I therefore urge the agency to do the utmost to properly inform the public and to proceed in the effort to protect National Forests. (Individual, No Address - #A26840.14000)

The service should work to educate the rest of the public, including persons opposed to the Roadless Rule, as to the benefits of the rule. (Individual, Dallas, TX - #A18002.15163)

The USDA and Forest Service should put the Roadless Areas Conservation Rule into effect right away, as it is a valuable policy that protects the national interest. The FS should also proceed with programs of public information to dispel misleading rumors and fears that have been spread by opponents of the rule. I have seen these scare campaigns in the past in the West, and I know this is just another one of the same. (Individual, Baltimore, MD - #A2321.10111)

#### **ABOUT RESOURCE MANAGEMENT NEEDS**

At the present time USFS requires, and taxpayers pay for, highly trained natural resource specialists for USFS field positions. But we let the Sierra Club and other special-interests environmental groups make resource management decisions by their influence over public opinion through their sophisticated media campaigns. The Forest Service needs to do a better job of educating the public about resource management needs. Resource management decisions must be made by Forest Service professionals who consider the benefits to the resource and the general public, not by environmental groups seeking to further their own self-interest agenda. (Individual, Walden, CO - #A20726.15163)

The Forest Service should focus on communicating and explaining the long-term social, economic and environmental benefits to local communities of maintaining roadless areas. (Individual, Deridder, LA - #A28678.15163)

### **384. Public Concern: The Forest Service should consider adopting the “Wood is Good” campaign.**

#### **TO CHANGE THE WAY PEOPLE VIEW WOOD-BASED PRODUCTS**

There is currently a “Wood is Good” campaign underway, being sponsored by a number of private companies, with the goal of changing the way people (with emphasis on young people) view wood based products and the way they are extracted and processed. This is the sort of program that the Forest Service could hitch its wagon to and begin to help change the way people view this greatest of natural resources. (Individual, No Address - #A16378.15163)

### **385. Public Concern: The Forest Service should educate the public with new materials.**

#### **BY PUBLISHING INFORMATIVE ARTICLES**

Publish Informative articles for educating and informing the local citizens. Send information to citizens on the mailing lists. (Individual, Mount Ida, AR - #A8739.14120)

#### **BY PRODUCING A TELEVISION PROGRAM REGARDING ROADLESS AREAS**

Evaluation by the public is best done through articles in newspapers throughout the US. The Forest Service could produce a TV show on National Roadless Forests for public TV. Communities adjacent to National Forests, particularly tribes could have public comment sessions set up by the Forest Service

personnel with a 2 page questionnaire sheet for participants to fill out. (Individual, Boulder, CO - #A3478.15152)

**BY DEVELOPING A SEMINAR FOR NEW USERS AND MONITORING ALL USERS**

Since I feel that these areas are of such grand value to us, I feel that we (the public) should be granted access to these lands; but since I feel that their value lies in their ‘untouchedness’, I feel it is important to regulate this access strictly. Certainly, it isn’t possible to police all of these areas all of the time, but I feel it is important that any party that wants to make use of these lands (either for recreational or educational uses) must be adequately informed and responsible. I feel that first time users should be given a short seminar on how to use the lands responsibly and that their equipment be inspected for the first two or three times which they make use of the lands. Not at all to make sure that their packs are properly tied or anything, but simply to make sure that they don’t take in anything which could harm the forest. Additionally, I feel that everyone who uses the forest should have to check in before and after they enjoy the forest. The inspections I’ve mentioned could well be random, but they are simply to ensure that nothing untoward gets taken into the forest, nothing improper gets removed and that everything that the campers, hikers, etc. take into the woods also comes back out and isn’t left to litter the hopefully pristine area. (Individual, Cambridge, MA - #A11912.90000)

**386. Public Concern: The Forest Service should educate the public.**

**RATHER THAN CLOSING MORE LAND**

We need to educate people to help maintain and enjoy what we now have, not shut off more land in a failing effort to save something that if left alone and not maintained will burn up and be of no use to anyone or anything. (Individual, No Address - #A1053.14120)

*Volunteerism*

**387. Public Concern: The Forest Service should encourage volunteerism.**

All National Forests and Parks should look to San Bernardino National Forest and its Adopt-a-Trail program for ideas on obtaining community assistance in forest maintenance and management. The SBNF utilizes the OHV community to perform a variety of maintenance tasks in order to keep the forest routes open to all visitors. By using the Adopt-A-Trail program, volunteers from the community can do the work of several rangers. The OHV community would be an enthusiastic supporter of forest route maintenance activities if they were asked. We recognize that we are a small fraction of the visitors, yet the routes we like to travel take an inordinate amount of effort on the part of the Forest Service or Park Service staff. Through our volunteering, we can keep the remote routes open to all that wish to visit and keep the manpower and real costs associated with that maintenance to a minimum. (Individual, Murrieta, CA - #A367.17140)

I believe volunteer help in situations where manpower is limited is one option. If people feel strongly enough about an issue, they should be willing to pitch in and help out. (Individual, No Address - #A455.17140)

I should also like to make note of the many contributions ORV users have made to the clean up and maintenance of our public lands. ORV users, under the guise of organized ORV clubs, have organized clean-up and maintenance runs and spent countless man-hours cleaning up and maintaining trailsides, campsites, and hard to reach areas that are otherwise left to the ranger and cleanup crews. No other group of users has come forward in this manner and in these numbers to assist in protecting the natural environment. (Individual, Saint Louis, MO - #A629.17140)

I have been an active volunteer in the Roanoke Appalachian Trail Club for over 25 years and am well acquainted with the use of and need for more protected forests and wilderness areas due to increasing

recreational use. Please don't waste all the volunteer efforts that have gone into our preserving our forest lands. (Individual, Roanoke, VA - #A4738.10111)

#### **TO CUT MAINTENANCE COSTS**

Might it be worth looking at volunteer users of the forest resource to help maintain or repair roads, etc. so that uses can continue instead of being shut down or restricted due lack of manpower or funds within your agency? (Individual, Rock Springs, WY - #A22428.17140)

#### **FROM USER GROUPS**

If a kind of human use of an inventoried roadless area is proposed, the "user group" should be enlisted to study the use impact on several currently "roaded" areas. The users could be encouraged to provide resources and volunteer labor to assist the Forest Service. Obviously, the Forest Service needs assistance and additional resources if it does not have a budget of sufficient size to enable it to maintain the existing roads in the national forests. (Individual, Cottonwood, AZ - #A26396.17140)

#### **FROM TROUBLED YOUTH, HUNTERS, AND ANGLERS**

We have 50 states; all have wildlife hunters and anglers. Assign each state a sector to manage, use the troubled youth that is sent off to reform schools or prison to maintain roads, manage the habitat—while RE-BUILDING THEIR LIVES, and make them into productive citizens.

ALL AMERICAN HUNTING and ANGLERS WOULD VOLUNTEER TIME TO MAKE THIS PROGRAM WORK. (Individual, Athens, GA - #A11212.17140)

#### **FROM RETIREES**

Accept retirees as custodians of all wildlife into all United States Forest Services. Place them in pairs for security. Issue what equipment that may be needed. The retiree may prefer to use his own equipment. I for one would volunteer. (Individual, Gatesville, TX - #A11152.17140)

## **American Indian Rights and Interests**

**Note on American Indian Rights and Interests and the Organization of this Section** – The United States Government has a unique legal relationship with Native American and Alaskan Native tribal governments that have been established by treaties, statutes, and court decisions. Agency activities and decisions are implemented in a knowledgeable, sensitive manner respecting tribal sovereignty and operating within a government-to-government relationship with federally recognized tribal governments following consultations which consider the rights, concerns, and potential impacts of federal government plans, projects, programs, and activities which may affect tribal governments and communities.

Similar to American Indians in other parts of the United States, Alaska Natives claim aboriginal rights, a trust relationship, and inherent governmental powers. Alaska Native tribes federally recognized by executive order are eligible for services, have the same governmental status as federally recognized American Indian tribes in the lower 48, and are entitled to the same protection and immunity privileges. These tribes have the right, subject to general principles of federal Indian law, to exercise the same inherent and delegated authorities available to other tribes and are subject to the same limitations imposed by law. In addition, Alaska Natives and Corporations have statutory rights that allow them to exercise their rights on portions of the Tongass and Chugach National Forests.

Because of the unique status of American Indian tribes and the government-to-government relation that exists between them and the U.S. Government, special care has been taken to review comments from tribes and tribal interests separately from comments of other respondents who discuss tribal interests. Accordingly, this section includes two subsections: Comments of

American Indian Tribes/Tribal Interests, and Comments from Other Respondents Regarding American Indian Tribal Interests. It should be noted that this distinction is based on how respondents identify themselves or their organization in their letters. It is possible that among comments attributed to other respondents are comments actually made by tribal members or tribal interests, but if so that is not determinable from the letters.

## Summary

**Comments of American Indian Tribes/Tribal Interests** – One tribal representative urges the Forest Service to conduct meaningful consultation with American Indians regarding roadless area management. A tribal corporation requests that the Forest Service reevaluate its working relationship with such corporations, since federal regulations grant them the same legal status as tribes.

Some assert that the Forest Service should manage public lands for traditional tribal uses in accordance with treaties. To that end, one tribal representative states that the Forest Service should consider treaty rights during roadless area evaluations and requests these rights are not violated in the name of collaboration or conflicting objectives with other outside groups. Some tribal representatives who address treaty rights urge the Forest Service to adopt the Roadless Area Conservation Rule in order to protect and restore treaty resources including, some point out specifically, anadromous fish populations. Representatives also ask that the Rule be implemented in order to protect American Indian cultural practices and to protect American Indian sacred sites.

One tribal corporation requests that the Tongass National Forest be permanently excluded from any national roadless rule in recognition of treaty obligations to tribal corporations in Alaska. This corporation states that “the special trust relationship enjoyed by Natives includes recognizing Native corporations in a manner that assists in fostering their success,” and concludes that, in lieu of relevant statutory direction, the Forest Service should conduct no further roadless area reviews and evaluations on the Tongass NF.

**Comments from other Respondents regarding American Indian Tribal Interests** – Several individuals urge the Forest Service to give high priority to American Indian concerns when formulating a national roadless rule. One person states that American Indian tribes should be consulted on their gathering needs and traditional knowledge of the natural processes in and for adjacent roadless wilderness areas. They also need to be consulted on new areas to be designated roadless wilderness and their rights respected. Another individual asserts that the Agency should clearly distinguish between tribal rights and other special interests, stating that to combine the two together would be wrong and disrespectful to the Tribes. Some ask the Forest Service to assist tribes in protecting their tribal lands from outside commercial interests. An Alaska resident requests that the Forest Service recognize the environmental impacts of gerrymandered timber-rich land grant allocations to tribal corporations, as well as corporate accounting practices which favor liquidation of tribal corporation forest resources at a loss for tax purposes.

Some assert that federal land management should be delegated to American Indians due to their proven record of caring wisely for the land. Others stress that American Indians should be allowed access to roadless areas to continue traditional activities and cultural practices. A number of these respondents state that the Roadless Area Conservation Rule will not hinder this, and therefore it should be adopted in order to protect archeological and cultural sites from degradation or inadvertent destruction. Several respondents from Southeast Alaska describe the

importance of subsistence hunting and fishing, and state that the Rule should be applied to the Tongass National Forest immediately in order to prevent further degradation of these resources due to timber harvest and roadbuilding (see also Chapter 5: Designating Areas (Question 8): Inclusion/Exclusion of Specific Areas from a National Roadless Rule: *Inclusion*). Another individual requests that more sustainable forestry practices be adopted in the Pacific Northwest, where traditional weaving is threatened by commercial over-harvest and lack of sufficient old-growth cedar and other species to provide materials.

One respondent states that tribal governments should not adopt a similar roadless policy for reservation forests because it will have a negative economic impact on American Indians.

### ***Comments of American Indian Tribes/Tribal Interests***

#### **388. Public Concern: The Forest Service should conduct meaningful consultation with American Indians regarding roadless area management.**

Consistent with its trust responsibility, the Forest Service must conduct meaningful government-to-government consultation with tribes. This means sending appropriate officials with decision making authority to consult with the Tribe on issues surrounding development of any roadless area strategy and developing mutually satisfactory proposals. The Nez Perce Tribe expects such consultation to occur with Forest Service officials with decision-making authority over the ultimate decision for roadless protection. (Chairperson, Tribal Government, Lapwai, ID - #A11821.85100)

#### **389. Public Concern: The Forest Service should reevaluate its relationship with tribal corporations.**

Under the provisions of numerous CFRs, Sealaska, Native village and Native urban corporations have the same status as tribes. The Forest Service must review its position regarding how it interrelates with these special status corporations. (Tribal Corporation, Seattle, WA - #A20468.85100)

#### **390. Public Concern: The Forest Service should manage public lands for traditional tribal uses in accordance with treaties.**

##### **BY CONSIDERING TREATY RIGHTS DURING ROADLESS AREA EVALUATIONS**

The Forest Service is obligated to abide by Indian treaties, comply with state and federal water quality standards, and to protect fish and wildlife. It is not obligated to log. With respect to tribal treaty rights, the federal trust obligation requires that the Forest Service take actions to protect cultural resources and ensure harvestable levels of fish, wildlife, and plant resources to ensure meaningful exercise of treaty rights. The Forest Service must therefore consider the area's characteristics relative to its obligations during roadless area evaluation. (Columbia River Inter-Tribal Fish Commission, Portland, OR - #A20331.20000)

##### **BY IMPLEMENTING THE ROADLESS AREA CONSERVATION RULE**

It is critical that the Forest Service consider and honor its treaty and trust obligations to tribes in evaluating and implementing any roadless area strategy. This means that the Forest Service must take actions necessary for the protection of cultural resources and the protection and enhancement of harvestable levels of fish, wildlife, and plant resources necessary for the meaningful exercise of treaty-reserved rights. (Chairperson, Tribal Government, Lapwai, ID - #A11821.85100)

How can the Forest Service work effectively with individual and groups with strongly competing views, values, and beliefs in evaluating and managing public lands and resources, recognizing that the agency cannot meet all of the desires of all of the parties?

The Forest Service must take actions that are consistent with its statutory and treaty obligations. This means taking actions necessary to protect endangered species, protecting clean water, and protecting

greatly reserved resources. The Forest Service must develop proposals necessary to meet these obligations and then, and appropriate, solicit public comment and conduct appropriate and meaningful government-to-government consultations with tribes. (Chairperson, Tribal Government, Lapwai, ID - #A11821.85100)

**391. Public Concern: The Forest Service should not abdicate tribal treaty rights in order to foster harmony between competing interests.**

During the new round of comment the Forest Service must remain cognizant of the federal trust responsibilities associated with tribal treaty rights. The Forest Service does not have the authority to abdicate treaty guaranteed rights. Tribal treaty rights cannot be ignored or allowed to erode for the purposes of fostering harmony between groups with conflicting objectives. Treaty rights to fish and hunt require that protection of fish and wildlife be placed on a higher level than maintenance of a timber supply to a local mill or provision of off-road vehicle trails for recreation. A useful analogy would be to think of Indian tribes with treaty rights to take fish (a property right) as being akin to miners with patents on federal lands. The Forest Service does not manage mining on the basis of local “collaboration” processes, but instead on the basis of rights secured by the Mining Law of 1872. If the Forest Service were to treat Indian tribes with that same measure of legal force which it addresses the Mining Law of 1872 and the rights of miners, it is likely that fish and wildlife populations on federal lands would be in much better condition. (Columbia River Inter-Tribal Fish Commission, Portland, OR - #A20331.85311)

**392. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule.**

**TO FOSTER TREATY RESOURCE PROTECTION**

Many treaty resources have declined in abundance, most notably anadromous fish species, and roadless areas play an important role in the protection, conservation, and potential recovery of these species. Roadless areas contain and support important aquatic habitat, protection of which is essential to the continued existence of the species. Timber harvest, road building, and other ‘development’ in these areas would cause sedimentation, temperature increases, fragmentation in habitat, and other adverse effects for aquatic habitats both within the roadless area as well as downstream from it. This in turn contributes to the decline of both listed and unlisted species. It is for such reasons that the Commission’s salmon restoration plan, (*Wy-Kan-Ush-Mi Wa-Kish-Wit, Spirit of the Salmon*) the Columbia River Anadromous Fish Restoration Plan of the Nez Perce, Umatilla, Warm Springs, and Yakama Tribes (CRITFC, 1995) calls for cessation of logging, mining, and road construction in all roadless areas of 1,000 acres or greater. (Columbia River Inter-Tribal Fish Commission, Portland, OR - #A20331.85200)

**TO PROMOTE TRIBAL SALMON RECOVERY EFFORTS**

The roadless areas of National Forests within the Tribe’s treaty territory are central to both tribal and federal efforts to recover imperiled species. For example, in its recent salmon recovery plan for Columbia River basin salmon and steelhead, the Forest Service and other resource agencies state, “For tributary habitats on federal land, the federal land managers will protect existing high quality habitat and accelerate restoration in high priority subbasin.”

The Nez Perce Tribe carefully weighs and balances all the costs and benefits of natural resources management and protection to the recreational, cultural, religious, subsistence, economic, and commercial utilization of National Forests by its members. Tribal members are employed by the timber industry and can be affected by decisions to implement or endorse nature resources management strategies. On June 14, 2000, after a careful review and consideration of the proposed roadless area protection, including consultation with appropriate Forest Service representatives, the Nez Perce Tribe endorsed the previously developed Roadless Area Conservation Rules as a plan consistent with both the federal government’s treaty and trust obligations and the Tribe’s own salmon recovery efforts. A copy of these comments is attached.

The Tribe continues to support the system of roadless area protection developed by the Forest Service. (Tribal Government, Lapwai, ID - #A11821.85000)

**TO PROTECT AMERICAN INDIAN CULTURAL PRACTICES**

I am writing to express the concerns of the Leech Lake Reservation over attempts to diminish or repeal the gains made toward the implementation of the Roadless Conservation Rule. As I am sure you are aware, the Leech Lake Reservation and the Chippewa National Forest overlap, so we have first-hand knowledge of how excessive road building can affect the resources of an area and, in our case, the traditional activities of tribal members. (Tribal Government, Cass Lake, MN - #A31097.85311)

**TO PROTECT AMERICAN INDIAN SACRED SITES**

Many of these sacred sites are as spiritually important to Native Americans as the Sistine Chapel and the Wailing Wall are to others. Bulldozing a road directly through Arlington National Cemetery would cause public outrage, however sites as sacred and significant to Native Americans continue to be destroyed within Forest Service Lands. Building roads into the pristine wilderness environments will preclude religious use for many tribes. Noise, environmental degradation, and competition from increased recreational use would also effectively prevent continuation of tribal religious practices.

Native Americans have already lost so much of our culture and tradition. It is high time that the First Nations of this area are granted the same freedom of religion enjoyed by most Americans today. We urge you to keep native American Sacred Sites in the forefront of any decision-making regarding roadless areas. (Tribal Association, Arcata, CA - #A17205.80120)

**393. Public Concern: The Forest Service should exclude the Tongass National Forest from a national roadless rule.****TO FULFILL OBLIGATIONS OF THE UNITED STATES' TRUST RELATIONSHIP WITH AMERICAN INDIANS**

The Tongass NF must be administered in a manner that is much more sensitive to Indian law, which recognizes ANCSA corporations as being tribal, ANCSA, and ANILCA. The special trust relationship enjoyed by Natives includes recognizing Native corporations in a manner that assists in fostering their success. Per USDA Departmental Regulation No. 1340-006; Subject: Policies on American Natives, dated October 16, 1992; Policies, b. states "Consistent with applicable law, USDA officials will consult with tribal governments and ANCs (Alaska Native Corporations) regarding the influence of USDA activities on water, land, forest, air, and other natural resources of tribal governments and ANCS." And c." . . . Consistent with applicable law, USDA officials will solicit input from tribal governments and ANCs on USDA policies and issues affecting tribes and will seek to reconcile Indian and Alaska Native needs with the principles of good resource management and multiple use."

Section 708 of ANILCA, when combined with Section 1326 of ANILCA, can only be read to direct the Forest Service to conduct no further roadless area reviews and evaluations on the Tongass NF. (Tribal Corporation, Seattle, WA - #A20468.20200)

***Comments from Other Respondents Regarding American Indian Tribal Interests*****394. Public Concern: The Forest Service should give high priority to American Indian concerns when formulating a national roadless rule.**

The Native American tribes tend to have values in line with the ones here expressed, and I expect that the inevitable differences of emphasis will not be so great that they cannot be resolved by straightforward negotiation. They have seniority on the land, treaty agreements supporting their interests, and a respectful attitude toward natural life and the land. Their opinions should be taken seriously. (Individual, Dallas, OR - #A3697.85110)

The concerns of Native Americans should receive high priority because they were the earliest inhabitants and, in many cases, their land was essentially taken from them. The spiritual values of early Native Americans include respect for natural settings and wildlife that other Americans would be wise to adopt. (Individual, Gallatin Gateway, MT - #A19100.85340)

**395. Public Concern: The Forest Service should conduct meaningful consultation with American Indians regarding roadless area management.**

I want Native American tribes and their elders consulted on their gathering needs and traditional knowledge of the natural processes in and for adjacent roadless wilderness areas. They also need to be consulted on new areas to be designated roadless wilderness and their rights respected. This is very important and may help us re-introduce fire into the ecology again. (Individual, Talent, OR - #A23553.85300)

**396. Public Concern: The Forest Service should clearly distinguish between tribal rights and other special interests.**

Distinguish between the rights of Native Americans and 4-wheeler clubs: the first are sovereign states, the latter are recreationists, and to muddle them together as “interest groups” is an astonishing affront. Tribes should have rights on a par with the Federal agencies who own the adjoining lands. (Individual, Bozeman, MT - #A27070.85300)

**397. Public Concern: The Forest Service should protect American Indian lands from commercial exploitation.**

The Forest Service should in all cases protect the rights of Native American groups to secure protection of their lands from commercial exploitation by outside groups. (Individual, New Haven, CT - #A616.85000)

**398. Public Concern: The Forest Service should acknowledge the environmental consequences of the tribal corporation land grant selection process.**

It is important to point out that during the land grant selection process by the newly formed Native Corporations, the property boundaries were manipulated to take in the most valuable timber stands, leaving the less valuable stands and barren land to public ownership. This was the epitome of gerrymandering, and has now resulted in vast areas of “cut-over” adjacent to and throughout National Forest Lands. (Individual, Sitka, AK - #A1056.85320)

**399. Public Concern: The Forest Service should review native corporation and institutional logging contracts in southeast Alaska.**

It should be pointed out that Shee Atica Native Corporation of Sitka has recently signed a contract with ITT Rayonier to liquidate the remaining timber on their Katlian River Watershed land grant near Sitka. Their plan is to generate net operating loss to reduce their corporate tax obligations. It can be expected that Mental Health Trust and University of Alaska land grants which comprise the remainder of productive timberlands in the Katlian watershed, will be added to Rayonier’s logging contract. (Individual, Sitka, AK - #A1056.85320)

**400. Public Concern: American Indians should be allowed to manage public lands.**

Tribes have suffered enough, and should have predominant say in the management of their lands. (Individual, Colorado Springs, CO - #A17259.15000)

**BECAUSE OF THEIR PROVEN RECORD OF CARING WISELY FOR THE LAND**

Regarding management of all public lands as well as fish and game! This job should have long ago been given to the people with the best resume as well as the people with the longest running and proven record of care for the land, and fish and game for thousands of years before we got here! (The American natives managed very well to the land and as far as I have been able to find out, never causing any kind of fish, animal or bird to become extinct!) The Forest Service, BLM and Fish and Game have tried, failed and next will restrict us more and more. This is not the answer! Every American native was born and raised to respect the land and everything on, above or below it! They provided us a very beautiful place to conquer, unmarked, unscathed. And look what we have done to it! It’s a simple matter of

educating the hordes of people from the cities prior to visiting our beautiful public lands. Teaching them to respect what they are about to experience when they get here-at a young age! I have seen deer taken, never gutted even though they were shot days before, hauled south for proof, pictures and discarded, never eaten! These people do not care-no one asked them or told them to respect the land they are about to visit or anything that might be there, or why! The job of educating the people as well as controlling public lands, fish and wildlife could be done no better than by Native Americans! (Individual, Hot Springs, MT - #A966.70000)

#### **401. Public Concern: The Forest Service should allow American Indians to practice traditional religious and cultural activities in roadless areas.**

Native American religious and cultural observances are also an appropriate use of roadless areas and could be used discretely to help us white, black, Latino, and Asian and Polynesian folk get in touch with our own ancestries and the spirit of the land and inner/outer god(desses) that is within all if us and surrounds us. (Individual, Watsonville, CA - #A6767.70000)

Activities by Native Tribes should be held to a different standard than those of the dominant Anglo culture. It is regrettable that some tribes may choose to manage their lands intensively for commodities, but that is their choice. I do not personally see the connection between roadless areas of public lands, and tribal land management concerns, but if there are conflicts, special consideration should be given to the Native Tribes, especially regarding preservation of their traditional life ways. (Individual, Corvallis, OR - #A650.85300)

Allow access to native peoples to practice religious observances on a non-continuous basis. (Individual, Atlanta, GA - #A873.85312)

Exceptions should be made for tribes. Tribes should have virtually unrestricted access to federal lands adjacent to their adjacent to their properties when such access is for the purpose of exercising traditional rites. (Individual, Olympia, WA - #A10330.85300)

USFS representatives must recognize the importance of maintaining traditional and historic cultural activities impacted by restricting access to or expanding roadless areas, such as preservation of Native American cemeteries and burial grounds, traditional activities such as pine nut harvesting, hunting and fishing, rock hunting, Christmas tree cutting and firewood cutting. (Elected Official, Alpine County, CA - #A8597.85330)

#### **402. Public Concern: The Forest Service should implement a national roadless rule.**

##### **TO PROTECT AMERICAN INDIAN CULTURAL PRACTICES**

[Roadless areas] preserve areas needed for traditional Native American religious and cultural observances. (Elected Official, State of New Hampshire - #A4536.85300)

Without intact forests, the cultures of Native Americans are threatened and will become extinct. This would be a terrible loss for all Americans. (Individual, Inver Grove Heights, MN - #A260.85310)

The FS has already identified IRAS, through extensive public input under the aegis of RACR. It is quite simply time to implement them. since the matter is under litigation, the least that FS could do in the interim is protect with due diligence the following values:

Native cultural values—These IRAS should preserve and protect the traditional religious and cultural ceremonies of the people of the First Nations, the Native Americans. To embark on a new road building program, like the one proposed for the Gravina Island in Tongass, would adversely impact the traditional way of life that the Tlingit and the Haida pursue. (Organization, Seattle, WA - #A11782.85310)

Native peoples need their sacred sites and wild areas for ceremonies and other activities, and it is hard to tune into the Great Spirit when you keep getting reminded and irritated about how reckless human “management” of the landscape is in most roaded areas. (Individual, Los Angeles, CA - #A17161.85311)

#### **TO HELP PROTECT AMERICAN INDIAN SACRED SITES**

Extremely important: protect the sacred lands of the various tribes so that they can maintain their cultural heritage. I find it hard to understand why Mt. Rushmore cannot be climbed, but Devil’s Tower is wide open to public destruction. Such unequal rulings diminish the Forest Services’ and Park Services’ credibility. (Individual, Lopez Island, WA - #A15240.85311)

### **403. Public Concern: The Forest Service should ensure subsistence needs are met for southeast Alaska rural communities.**

#### **BY MAINTAINING WILDLIFE AND FISH POPULATIONS**

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. (Organization, Nevada City, CA - #A4941.85210)

I would like to mention the perspective of Merle Hawkins, a leader in the native community of Metlakatla near Ketchikan. Merle is the one who taught me some of the secrets of subsistence gathering on Gravina Island. She, like many others, depends on the harvest of subsistence foods such as salmon, berries, deer, beach asparagus and other edibles in the intertidal zone. She has lived here her whole life, studied her history, and tried to pass it on. She feels very strongly that Gravina Island should be protected and that the local planning process, and EISs in developing this particular sale, are flawed and fail to represent the true impacts to the native culture and community. She says, “if you don’t like wild forests and this way of life, move somewhere else.” (Organization, Bloomington, IN - #A28110.85200)

#### **BY ALLOWING AMERICAN INDIAN TRIBES TO HUNT IN NATIONAL FORESTS**

Indian tribes who hunt in these forests may be allowed to do so. But no roads should be built to facilitate this hunting. No roads should be built for any reason whatsoever. (Individual, Anchorage, AK - #A518.85312)

### **404. Public Concern: Tribal governments should not adopt a similar roadless policy for reservation forests.**

#### **BECAUSE IT WILL HAVE A NEGATIVE ECONOMIC IMPACT ON AMERICAN INDIANS**

With regard to Tribal roads, a roadless policy inside a reservation forest would have a negative economic impact. Tribal forests are utilized for timbering and recreation. These activities generate millions of dollars of revenue which support programs for Native Americans. (Elected Official, Gila County, AZ - #A3013.85320)

### **405. Public Concern: The Forest Service should support a more sustainable timber industry.**

#### **TO PRESERVE TRADITIONAL NORTHWEST WEAVING**

I make my living practicing traditional Northwest weaving, using the native materials of Western Red Cedar, Yellow Cedar, Yew, and Birch. These resources have been diminishing at a rapid rate through

years of logging practices, which have not taken into consideration all the economic values of maintaining forest ecosystems.

When I am no longer allowed to gather from public land, and private land clearing is no longer an option because the slow growing cedar trees have not been replanted, I will stop practicing my profession as a traditional weaver rather than be a part of the further loss of the old growth forests on public land.  
(Individual, Indianola, WA - #A25409.65290)

## Competing Values/Limited Resources (*Question 9*)

**Question 9: Competing Values and Limited Resources.** How can the Forest Service work effectively with individuals and groups with strongly competing views, values, and beliefs in evaluating and managing public lands and resources, recognizing that the Agency cannot meet all of the desires of all of the parties?

This section includes one subsection: Managing Competing Interests.

### Managing Competing Interests

#### Summary

**General Comments** – Managing competing interests is a topic of comment to a number of respondents. Some suggest that before the Forest Service can manage competing interests, it must first clarify its purpose and mission; others say that it must first restore public trust. Additional suggestions include complying with current and applicable laws and legislation; understanding political, management and leadership issues; ensuring a fair and open process; using scientific studies; evaluating relative impacts of competing uses; considering who is most affected by the decision; and ignoring extreme viewpoints. Aside from suggestions for how to manage competing interests, some state that consensus is an unrealistic goal and that it must be acknowledged that some parties will not be satisfied with management decisions.

**Administrative/Agency Guidance** – Some respondents assert that the Forest Service can best manage competing interests by taking a more proactive role in making decisions. One respondent states that it is “crucial” that the Agency remains the lead on decisionmaking and forest management issues and is worried that other agencies will unduly influence the process and decisions. These respondents assert that the Forest Service is a professional agency, that its purpose is to manage federal lands, and that it should take responsibility for decisionmaking. Likewise, some state that the Forest Service should allow trained foresters to make decisions rather than relying on public comment.

**Local Forest Planning Process** – A number of respondents assert that the local forest planning process provides the best way to work with different groups. They believe that there are so many different viewpoints in the nation, that maybe at the local level is where the Agency will be able consensus. Writers state that local decisionmaking is also more effective in managing competing interests because issues relating to specific areas can be discussed and there is more knowledge of ecological conditions.

**Enhanced Collaborative Efforts** – Some suggest that competing interests can be managed effectively through enhanced collaborative efforts. People suggest this can be achieved by making every effort to meet everyone’s needs, using conflict resolution strategies, using professional negotiators, or by forming advisory planning groups. Others suggest that the Forest Service should collaborate with special interest groups, although some state that special interest

groups won't compromise without an incentive to do so. In general, however, many assert that the fairest way of resolving differences among groups is through compromise. (See also Chapter 3: Working Together (Question 2): Public Involvement in Decisionmaking: *Collaboration Processes, Collaboration with States and Local Governments, Collaboration with Agencies, and Collaboration with Other Groups.*)

**Public Education/Information Efforts** – Several respondents advise using public education to resolve conflicts. This may be attempted through forest rangers, seminar programs, or by establishing a department of information. Some comment that it seems like the Forest Service's only way to address a problem is by closing access to the forest and suggests education to mitigate problems instead.

**Forest Service Staff Training/Education** – Some suggest that management of competing interests requires proper Forest Service staff education and training. Respondents suggest that Forest Service employees should be unbiased, should be able to work with a diverse constituency, and should understand political, management, and leadership issues. Others suggest the Forest Service should employ a diverse staff by hiring conservation biologists, naturalists, and people from all backgrounds.

**Will of the Public/Elected Representatives** – Many respondents assert that the Forest Service can best manage competing interests by abiding by the wishes of the majority. These people state that National Forest System lands are owned by the majority and therefore the "Forest Service should give weight to the overall opinions of all Americans" rather than just the presidential administration, private interests, or special interest groups (see also Chapter 1: National Roadless Protection – General Remarks: Need for the Roadless Area Conservation Rule: *Implement the Roadless Area Conservation Rule* and Chapter 3: Informed Decisionmaking (Question 1): Local vs. National Decisionmaking: *National Decisionmaking*). However, some state that conflicts can best be resolved by allowing elected officials to make decisions, because in a republican form of government it is elected officials who represent the public.

**Ecosystem or Preservation Values** – Some suggest that the best way to resolve competing interests is to place the highest value on ecosystem preservation. One individual remarks that the Forest Service should be a steward of the forest and an advocate for wild lands, before trying to resolve diverse opinion. Some assert that the destruction of a roadless area is irreversible but the preservation of a roadless area is not, and therefore the Forest Service should "err on the side of caution" by holding preservation as the highest priority when seeking to resolve conflicts.

### *Managing Competing Interests General*

#### **406. Public Concern: The Forest Service should clarify its purpose and mission in order to manage competing interests.**

Clearly define purpose and goals. If all interests can be met within the guidelines, great, if not at least all parties will be aware of the constraints. The forest service should not have to satisfy private interests. The forest service should only work to protect the public resource and maintain the current roadless wilderness areas. There is enough development. (Individual, Beverly Hills, MI - #A4756.15161)

##### **BY APPOINTING A COMMISSION TO ADDRESS THE ISSUE**

At the local level the Forest Service can bring the competing values and desires together. It takes dedication, time and perseverance but it seems to be the only way consensus can be reached.

It would be beneficial to have a National consensus regarding the overall mission and purpose for the National Forest System. This is real fuzzy now. A good start was made with the points of agreement from the 7<sup>th</sup> Forest Congress but there was very little follow-up. Maybe there could be a blue-ribbon commission appointed to address this issue. (Individual, Salt Lake City, UT - #A22628.15160)

**BY DEVELOPING A MISSION STATEMENT**

The roadless plan should be scrapped. It is time to put the stench of the last administration behind us. The forest service needs to develop a mission statement that all people can live, especially those most affected by agency decisions. It needs to stop pandering to the environmental community. (Individual, Emmett, ID - #A110.10130)

[Question 9] It would be beneficial to have a National consensus regarding the overall mission and purpose for the National Forest System. This is real fuzzy now. A good start was made with the points of agreement from the 7th Forest Congress but there was very little follow-up. Maybe there could be a blue-ribbon commission appointed to address this issue. (Organization, Wenatchee, WA - #A22628.15160)

**407. Public Concern: The Forest Service should restore the trust of the public before attempting to manage competing interests.**

Be open and honest with the public. The travesty that was the previous public meetings regarding this issue was downright insulting. The members of the public who attend deserve to be treated with at least some modicum of respect that has been sorely lacking from the agency in recent years, at least above the individual districts. I believe the agency will have a monumental task simply restoring the confidence and trust of the public before there is any hope of effective compromise between competing interests. (Individual, Los Alamos, NM - #A3720.15110)

First and foremost, be open and honest with the public. The travesty that was the previous public meetings regarding this issue was downright insulting. The members of the public who attend deserve to be treated with at least some modicum of respect that has been sorely lacking from the agency in recent years, at least above the individual districts. I believe the agency will have a monumental task simply restoring the confidence and trust of the public before there is any hope of effective compromise between competing interests. (Individual, Denver, Co - #A5433.12230)

**408. Public Concern: The Forest Service should manage competing interests.**

**BY IMPLEMENTING THE ROADLESS AREA CONSERVATION RULE**

On the website you asked how to deal with competing values and limited resources - the policy enacted on January 12, 2001 deals with this problem in the best way possible. It created the idea of compromise—in 51% of the forests, logging, drilling, and mining will continue to be allowed, while it will be prevented in the remaining 49%. Even here, some leeway is provided, as all contracts already in effect in those areas may be seen through to the end. A more balanced compromise could not be asked for. It is time for people to learn to live within their means and to limit their demands on the environment.

For these reasons I urge you to let the rule stand as it is written in the January Record of Decision. It is an admirable move to protect our national forest roadless areas—without loopholes, waivers, or additional exceptions. Once these forests are gone, they're gone forever, and with them goes an important source of the human spirit. (Individual, Riverside, CA - #A4971.10150)

**BY COMPLYING WITH CURRENT LEGISLATION, USING THE BEST AVAILABLE INFORMATION, ENCOURAGING LOCAL INPUT, AND PROVIDING SUFFICIENT STAFF**

There will never be consensus on the management of national forests. Therefore, the Forest Service must anticipate dealing with conflicting values. If the Forest Service bases the forest planning and decision making process on the following elements, there will be a higher likelihood of acceptance and successful implementation.

Compliance with current legislation including the National Forest Management Act, use accurate site-specific information, seek and encourage local community involvement, authorize and support local decision making, use the best available science as a foundation for any analytical review and resulting recommendations, provide sufficient staff and other resources so that local forest plans can be successfully implemented. (Business or Association, Boise, ID - #A17232.13000)

#### **BY COMPLYING WITH ALL APPLICABLE LAWS**

As previously mentioned, the Forest Service is mandated to follow the NFMA, NEPA, as well as the ESA, APA, CWA, as well as other established federal laws. If the Forest Service would obey the law, many of the problems of “competing views” would be solved. (Organization, Salt Lake City, UT - #A17170.20200)

#### **BY IDENTIFYING WHAT IS REQUIRED BY LAW AND WHAT IS DISCRETIONARY**

The Forest Service must act consistently with its statutory and treaty obligations. The Service must first act to protect endangered species, clean water, and treaty reserved resources. The Service cannot back out of these obligations or create compromises for the purposes of reducing political pressure. Thus, an important step that the Forest Service could take to deal with many of its competing interests is to identify what is required by law and what is discretionary. This will narrow debates, protect property rights, and clarify whether a remedy can be had via Forest Service policy change or whether it must be through changes in state or federal law. (Columbia River Inter-Tribal Fish Commission, Portland, OR - #A20331.20000)

#### **BY COMPLYING WITH THE NATIONAL FOREST MANAGEMENT ACT**

*Competing Values and Limited Resources:* There will likely never be full agreement between all the parties interested in the national forests. With a lack of political consensus to change the statutory mission of the national forests, the Forest Service must adhere to the current body of legislation, most importantly to the National Forest Management Act. (Business or Association, Rockville, MD - #A13306.15160)

#### **BY COMPLYING WITH THE NATIONAL ENVIRONMENTAL POLICY ACT**

The Forest Service has a proven tool for working with the public to make sure that all views are heard—NEPA. It is true that the Forest Service cannot ever meet all the desires of all interested parties but the Forest Service can ensure an open process, build an adequate record for decisions and provide reasoned explanations to avoid or minimize conflicts and litigation. In addition, even if it makes some groups unhappy, the Forest Service must be sure to work within the current statutory framework. However, consistent with legal and regulatory constraints, are opportunities for consensus building. Constructive dialogues at the Forest level of community involvement can help bridge differences and narrow the range of disagreement through mutual education. This is a proven approach, but the USFS must encourage line officers to engage in such processes, as many avoid it due to the intensity of the issue and staff resources that must be committed. (Business or Association, Spokane, WA - #A17351.15161)

#### **BY PREPARING ENVIRONMENTAL ANALYSES IN CONFORMANCE WITH THE NATIONAL ENVIRONMENTAL POLICY ACT**

The best way to work with the variety of interests concerned with management of inventoried roadless areas is through the procedural regulations suggested in Question 1 . . . . The Forest Service can best work with a variety of interests by preparing environmental analyses in conformance with NEPA. (Individual, Long Beach, CA - #A25664.20203)

#### **BY CONSIDERING THE RESULTS OF THE UNITED STATES INSTITUTE FOR ENVIRONMENTAL CONFLICT RESOLUTION**

Results of the United States Institute for Environmental Conflict Resolution, NEPA Pilot Projects [FR Doc. 01-11898-Filed 5-10-01] might be useful [in resolving competing interests] if all else fails. Many participants attending a meeting concerning the above on June 8, 2001 in Denver, Colorado considered litigation the surest and least expensive way to put their point of view on the table of competing values.

If the Forest Service would have an independent constitutional overview of their new planning process, some of the competing social views would be minimized. (Individual, Rock Springs, WY - #A15658.15152)

**BY CONSULTING THE VOLUMES OF LITERATURE IT HAS PUBLISHED IN RESPONSE TO PUBLIC CONCERNS**

This is far too broad a question to be answered in one rulemaking process, but I would advise the Forest Service to look at the immense volumes of literature that it has published on the subject in response to concerns the public has raised. (Individual, Logan, UT - #A939.15150)

**BY ADEQUATELY UNDERSTANDING POLITICAL, MANAGEMENT, AND LEADERSHIP ISSUES AND PUTTING ASIDE ITS OWN SELF-INTERESTS**

The Forest Service must better understand political, management, and leadership issues of working “effectively with individuals and groups with strongly competing views, values and beliefs.” There is little evidence that that agency has given much thought to these complexities, hence most agency engagement tends away from collaboration and engagement and toward older forms of command and control behavior—often thinly camouflaged with language hinting at collaboration and positive interaction in search of public interest. The Forest Service must also put aside its own vested self-interest if it is to have any chance at working effectively with all parties. (Individual, Corvallis, OR - #A8027.15162)

**BY RECOGNIZING ITS OWN VESTED INTERESTS**

The agency must first begin by recognizing its own vested interests in certain kinds of organizational systems, management structures, and management methods. The agency is not a neutral arbiter amongst competing interests, but rather, has its own interests that are too often allied with private industrial users at the expense of all other citizens, interests and values. To date, despite glowing rhetoric about the need for greater collaboration and partnerships in planning and decision-making, the agency’s actions betray a continued interest in asserting technocratic power and control over the land and people. The RACR is not the proper venue for managers to relearn how to “care for the land and serve people.” The problems of Forest Service management extend far beyond the roadless area issue. We recommend that as a first step all Forest Service employees should read Dr. Paul Hirt’s excellent critique of Forest Service management, “A Conspiracy of Optimism.” (Organization, Eugene, OR - #A30352.15100)

**BY USING SCIENTIFIC STUDIES**

[Question 9] Get representatives of the competing views in a single room with USFS management and design a specific study that will prove or disprove the contentious issue. The Canadian Lynx is a good example here in Colorado. Environmentalists said the snowmobile tracks would harm the Lynx reintroduction by allowing a competing animal, the coyote, to walk on top of the hardened snow track and out-compete the Lynx. There was no scientific basis for this view but yet many snowmobile trails were closed. Over time the assumption was found not to be true but the trails are still closed. (Individual, Palmer Lake, CO - #A23361.14500)

**BY FOLLOWING THE EXAMPLE OF THE QUINCY LIBRARY GROUP**

The Quincy Library Group is one example of how diverse groups and competing interests can work together. (Permit Holder, Boise, ID - #A29589.15160)

**BY USING THE ADAPTIVE ENVIRONMENTAL MANAGEMENT PROCESS**

The Forest Service would do well to evaluate use of the Adaptive Environmental Management process. Now used by the BLM in the Pinedale Anticline Natural Gas Project in southwest Wyoming, AEM brings all user groups to the table, and allows local participants to construct management plans that specifically address local issues. The result is a plan that all participants can accept. Compromise, while not completely satisfactory to everyone, is at least a viable solution that everyone has a hand in. AEM has the added benefit of helping to prevent litigation and a lengthy and costly decision-making process. (Individual, Pinedale, WY - #A26289.15162)

**BY USING AN EARTH GOVERNING SOCIAL SYSTEM**

An Earth Governing Social System . . . would facilitate collaborative analysis, planning and coordination of activities effecting Earth systems. Such a system may be used on varying scales, from local communities to global ones. (Individual, Curtain Act, Australia - #A29708.15162)

**BY ENSURING A FAIR AND OPEN PROCESS**

The Forest Service must provide an open and fair process for the competing views, values and beliefs to be aired. The Forest Service cannot, as it did with the pending Roadless Actions, impose a preordained outcome on the decisions that it must make. The only way for the competing interests to be fully and fairly assessed is to ensure that local management remains paramount. While the Forest Service cannot meet all desires of all of the parties, it can ensure that the process that it uses is fair and open. (State Agency, Cheyenne, WY - #A22608.15160)

**BY PRESENTING BOTH SIDES OF THE ISSUE IN A BALANCED, HONEST, AND FAIR MANNER**

The last roadless effort had a very pronounced propaganda campaign pushing its roadless agenda, to the point of almost lying about the real situation, at least refusing to release any critical facts that didn't prove the absolute need to protect every last scrap of roadless ground in the US. I definitely agree that some areas need to be set aside, but there needs to be a balance. Without presenting both sides of the issue in an honest and fair manner, you're not going to get folks with differing viewpoints to agree on how to manage these areas. You will also not get a true picture of how the American public wants to see these areas managed if they don't understand the true issues and ramifications on both sides of the fence. (Individual, Wrangell, AK - #A30478.10135)

**BY APPLYING ITS POLICIES TO ALL INTERESTS CONSISTENTLY**

I am also a motorcyclist but stand in firm opposition to the motorcycle industry's supposedly representative voicing of what they present as unilateral rider desire that these protective laws be neutered. Despite this press to the contrary, I believe that most of us agree that there is need for strong protection. I, and many like-minded others, will gladly surrender the privilege to ride in or otherwise use protected areas in order to avert any risk to these resources, but ONLY if the law holds true for all—big business interests included. (Individual, South Bend, IN - #A1226.15120)

A policy that is inconsistent leads to a lack of National precedence, creating a policy with no teeth. Also it allows for too much influence from powerful lobbying organizations. Who exactly will have the "forest-to-forest" decision making ability? There is plenty of open land available to destroy with these operations. (Individual, Las Vegas, NV - #A1239.15120)

**BY BALANCING COMPETING VALUES**

Competing values and limited resources. As I have repeatedly suggested . . . the USFS should look at the system as a whole and come up with a comprehensive landscape-scale management plan that balances extractive and wilderness values. We already have over 400,000 miles of roads in the system to provide for extractive uses, and roaded lands constitute the majority of land cover. Protecting remaining roadless habitats merely lends balance (and barely, at that!) to the system as a whole by providing for both extractive/motorized and non extractive/non-motorized forest values. (Individual, Davis, CA - #A30523.15162)

The Forest Service needs to be a balancing practitioner of uses within the forest. One forest activity should not prevail over another, and in most situations not everyone is going to be satisfied with a particular decision that the Forest Service makes.

In the Tongass National Forest it is a fact that the logging industry takes precedence over other forest activities. Citizens of Wrangell, a Southeast Alaska town that lies within the Tongass National Forest, and others concerned would like to see more recreational opportunities available to them and prospective tourists. Bike trails, skiing, cabins, shelters, campgrounds and interpretive and educational opportunities are just some of the activities that could be pursued instead of logging. (Union, No Address - #A17699.15168)

### **BY CULTIVATING RELATIONSHIPS WITH ALL DIFFERENT INTEREST GROUPS**

The Forest Service also needs to cultivate cordial and permanent relationships with more than the livestock, hunting, timber and mining interests. It needs to spend just as much time with environmental organizations, urbanites, backpackers, birdwatchers, tree huggers, and women. You don't develop an understanding of all segments of society if you don't communicate with all segments of society on an equal basis. (Individual, Waterbury, VT - #A15433.15164)

### **BY CONSIDERING WHO IS MOST AFFECTED BY THE DECISION**

In regard to dealing with competing values on the subject of public lands management, the forest service should look at who the decision affects the most. A greater consideration, regardless of the numbers, should be given to local residents, governments and communities when making a decision that affects public lands and resources. A very minimal consideration should be given to the view of those who do not live in the area affected, regardless of the number of comments. (Individual, Manti, UT - #A25532.15111)

### **BY MAKING LAND USE DECISIONS BASED ON THE RELATIVE VALUE OF DIFFERENT USES TO SOCIETY**

Each competing use must be evaluated for its contributions to society and the local economy. The natural resources of each area ultimately will generally dictate the "highest and best use", i.e. forest product production, mineral production, grazing, recreation (both developed and undeveloped), etc. Look for the highest and best benefit to society as a whole—not just the selfish demands of a small vocal minority. NEPA, ESA, CEA, etc. will dictate limits of uses and protect the environment. These NF lands and natural resources must help support the demands of our growing society. Everything we depend upon must be derived from the earth. If it can't be grown—it must be mined. (Individual, Tucson, AZ - #A5625.15160)

Although competing interests for National Forest resources have intensified in recent years, there have always been competing interests in the use and management of the National Forests. In the Secretary of Agriculture's February 1, 1905 letter to the Forester (first Chief of the Forest Service), Secretary James Wilson outlines the general policy laid down for the Forest Service "in the administration of the forest reserves". This extraordinary letter has stood the test of time—particularly the closing phrase: "where conflicting interests must be reconciled the question will always be decided from the standpoint of the greatest good of the greatest number in the long run."

The United States is very fortunate in having an organization like the U.S. Forest Service; with its historic delegated authorities to manage the National Forests for the greatest good for the greatest number in the long run. Although numerous statutes have been passed to deal with more intensified and competing uses, Forest Service personnel, political appointees and competing forest users would benefit by reconciling conflicting interests and reaching consensus "from the standpoint of the greatest good of the greatest number in the long run." (Business, Juneau, AK - #A5440.15160)

The agency of course cannot "meet all of the desires of all parties" on all acres of a National Forest. The key is to identify the highest values and appropriate uses on all forest areas. In many instances, this requires segregating uses. There currently is an overabundance of roaded national forest landscape, to the detriment of other values. Currently unroaded areas can best be managed by retaining that roadless condition and emphasizing the variety of values associated with roadlessness. (Individual, West Glacier, MT - #A5946.15160)

### **BY EVALUATING THE RELATIVE IMPACTS OF COMPETING USES**

It also is important to consider the impact of any use. Will use A by 10 people compromise the use of the forest by 100? Will use B by 100 compromise only the use of 10 people? Clearly the second scenario is preferable. (Individual, Seattle, WA - #A17999.15168)

### **BY TAKING A LONG TERM VIEW**

[Question #9] Always take a long term view. Kill the goose today no eggs later. (Individual, Ellijay, GA - #A8020.15000)

The Forest Service should take the longest view possible. Forget about the current stakeholders and think of the next generation. Most Forest Service land is open to resource extraction. Practically all private land is open to resource extraction. Globally, the pressure to extract resources from natural areas mounts daily. Natural ecosystems are being lost and changed in ways that we don't yet understand. Clearly, a hundred years from now a protected natural area will be of more value than another tree farm.

The Forest Service should maintain a long term view in its dealings with people with differing viewpoints, and should request that participants in these discussions maintain a long term view. (Individual, Portland, OR - #A13436.50300)

#### **BY CONSIDERING EACH ROADLESS AREA FOR ITS CONTRIBUTION TO A LARGER CAUSE**

If you consider each roadless area for its potential contribution to a larger cause, I believe you can get people enthused about how best to combine and group the IRAs into something more meaningful. With this technique you will illustrate how a National Forest is stratified into two separate categories of land: that which will be used for the production of goods and services (more intensively managed) and that which will be managed for more intangible benefits (less intensively managed).

When the Forests complete their roadless reevaluation, I believe three types of land arrangements will become apparent. They are: (1) roadless lands which are widely dispersed; (2) roadless lands which are more closely grouped; and (3) some combination of both of these situations.

When a Forest has a widely dispersed IRA situation, it is destined to manage its roadless "islands" as "protectorates." It can highlight these few areas for their uniqueness and their contrast to the rest of the Forest (which is already dedicated to goods and services) and celebrate that they took charge in the "nick of time" to save what was left.

When a Forest has the IRAs in close proximity or groups, it can manage for a larger inter-connectedness. A line can be drawn around the outside boundary of the grouped IRAs within which a less intensive form of land management could occur. . . . This can be used to contrast with the remainder of the Forest that is more visibly dedicated to the production of goods and services (more intensive management).

I believe this approach would give both industry and the environmentalists the feeling that they have determined something useful and meaningful. They would be providing something visible for their causes plus resolving the current gridlock for future generations. They would, in fact, be delineating the portion(s) of the Forest that will be managed to produce the intangible benefits such as roadless, etc., while also defining the portion(s) of the Forest that will produce the goods and services. (Individual, Libby, MT - #A2301.15120)

#### **BY MAKING A DISTINCTION BETWEEN ROADED AND ROADLESS AREA VALUES.**

The USFS can easily and effectively manage competitive values, views and beliefs by distinguishing between the values and goals of NF roaded and roadless lands. Roaded lands are where development activities based on roads like intensive resource management, and motorized use should occur. Roadless lands area where low development, dispersed resource extraction like livestock grazing could occur. Roadless lands are where non-motorized recreation should be given priority. (Individual, Bozeman, MT - #A8818.15160)

#### **BY DISCOUNTING THE COMMENTS OF EXCLUSIONARY GROUPS**

In specific response to the question about conflicting uses, I propose any one group who proposes/supports the exclusion of any other person/group/activity be discounted and not given credit for comments. These folks/groups never learned the sharing rule/lesson in Kindergarten and don't have standing to comment.

While this may seem lighthearted I'm serious. Those who propose exclusion are not good citizens, but rather selfish and narrow minded. These are Public lands and as such are "for" the public to benefit from and use. Responsible multiple use policies are the proper direction to go. Thus, only those who are willing to share have a valid voice in this discussion. (Individual, No Address - #A21170.15110)

#### **BY IGNORING EXTREME VIEWPOINTS**

All sides must share information freely. Those with viewpoints at the extremes should be politely ignored. There is room only in the middle for resolution to these issues. (Individual, Hayden, ID - #A30279.15160)

#### **BY INCREASING DIRECT CONTACT BETWEEN REGIONS AND THE WASHINGTON OFFICE**

The role of the Regions would be greatly reduced by more efficient use of computers, more direct contact between the Washington Office and the (fewer) Forests and the increased authority of the Ranger Districts.

These changes would make the Forest Service more responsive to the social, political, economic and technical factors at work in policy development. They would increase the Forest Service's "doing" ability. They would strengthen the balance between national and local needs and desires and have a chance to promote harmony rather than acrimony.

Region One has been one of the most contentious areas in the country in dealing with roadless and Wilderness allocation. Please consider trying this approach to organization and planning in Region One and see if it helps get resolution to the roadless issues. (Individual, No Address - #A26264.15160)

#### **BEFORE ENGAGING THE PUBLIC**

The Forest Service should work harder at the beginning by developing a mission, and goals. If you stay within this mission to accomplish the goals, then you have done what needs to be done on the public's behalf. Remember that the most vocal people represent a small minority of the "public". Most people don't have time to go to meetings and read hundreds of pages of Federal Registers unless it directly affects them or their property. (Individual, Miami, FL - #A1110.12120)

#### **409. Public Concern: The Forest Service should not attempt to change the beliefs of citizens.**

There will always be individuals and groups with strongly competing views, values and beliefs in evaluating and managing our public lands and resources. The USFS will not, and should not attempt to change these strongly held beliefs. Even if they did, it wouldn't work. (Individual, Grangeville, ID - #A830.15163)

#### **410. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule has magnified conflict between groups.**

##### **Damage to Forest Service public relations**

Obviously, the Roadless Area Initiative is very controversial, both inside and outside the Forest Service. **It has greatly magnified the conflict between the urban environmental community and other National Forest users.** The battle lines are drawn. On one side is the Administration and every environmental organization; on the other, every rural state and its governor, every county board, hunters, ORVers, libertarians, and logging and mining associations. (Union, No Address - #A13245.15120)

#### **411. Public Concern: The Forest Service should recognize that consensus is an unrealistic goal.**

You will rarely find all sides agreeing on some middle-ground compromise; consensus is an unrealistic goal. As one environmental organization representative put it recently, "If I don't win I'll lose my job." People whose jobs depend on winning cannot be expected to reach any accommodations with the other side of an issue. (Organization, Cocolalla, ID - #A13511.15120)

#### **412. Public Concern: The Forest Service should recognize that not all parties will be satisfied with management decisions.**

All that can be done is to listen carefully to what they are saying and try to ascertain their reasons for their views. Their views are not wrong. We have to acknowledge that there will be some dissatisfied people and some who will be very happy over the same decisions. (Individual, Olympia, WA - #A278.15110)

Working effectively with individuals and groups with strongly competing views is difficult. I do not believe that organized development and preservation groups represent the silent majority. Intense public involvement with local service organizations might educate these people and vocalize the silent

majority. Integrating public input, both local and national, with capability of the land in an honest and forthright manner during the planning process is the best way to do this. If everyone is a little unhappy and the land does not suffer you probably have it right. (Individual, Dayton, WY - #A5074.15110)

**413. Public Concern: The Forest Service should recognize that most competing values arise from radical groups.**

Most of the “competing values” arise when you get unbending radical groups on one side and virtually everyone else on the other. Remember, there is no compromise when you are dealing with these groups. When was the last time you heard an environmental group offer to “give” anything except less of what they want and don’t have? Any time anyone else is asked to compromise, they have to give something such as access to their favorite area or another 5 acres of what they used to have access to. (Organization, Richfield, UT - #A20428.15121)

### *Administrative/Agency Guidance*

**414. Public Concern: The Forest Service should implement the desires of the current President.**

What is the best way for the Forest Service to work with the variety of States, tribes, local communities, other organizations, and individuals in a collaborative manner to ensure that concerns about roadless values are heard and addressed through a fair and open process?

The best way to be fair is to let the leader elected by 280 million Americans decide. Whatever Bush would like is the will of the American people. (Individual, Silver Spring, MD - #A4593.15165)

**415. Public Concern: The Forest Service should take a leadership role and finalize its decision.**

The Forest Service needs to take a strong leadership position in managing forests and natural resources and be willing to make decisions, knowing that their decisions will almost always be unpopular with one or more interests. The agency has, in recent years, stepped back from its leadership role and attempted to be a convener or facilitator, often unwilling to make decisions where groups with competing views are simply unable to reach consensus. (Permit Holder, Denver, CO - #A15385.15160)

Follow a good process involving all parties, examine all options, listen to the public, make a good decision, and stick to it. The Forest Service has done all but the last. (Organization, Seattle, WA - #A21694.15160)

The inventory of the roadless area has taken over a decade and cost the taxpayers millions of dollars. It is time that the rules are followed through and enforced. The forest service needs to stop asking questions on how they should function and start protecting our forests. All sides have been heard and now it is time for action. As a taxpaying voting citizen I am very frustrated with the amount of procrastination the roadless act has seen. Money should stop being wasted and work should start getting done. (Individual, Helena, MT - #A17696.15161)

From the ski industry’s perspective, it is crucial that the Forest Service function as leader and decisionmaker on forest management issues, whether it be at the planning or site-specific level. The agency has a statutory duty to manage forest resources to provide outdoor recreation opportunities to the public under NFMA and under the National Forest Ski Area Permit Act, and, moreover, brings recreation experience and expertise to the table. As other agencies, federal and state, get more involved and express more vocal opinions about management of forest resources, the need for leadership at the Forest Service becomes paramount. (Permit Holder, Denver, CO - #A15385.15162)

**416. Public Concern: The Forest Service should allow trained foresters to make decisions.**

The most important concern for “roadless” area management is to get the East vs West to make the determinations truly necessary to maintain our forests and wildlife. We can do this best by cutting the funding these environmentalists have tapped and end the ceaseless court cases. There are no roadless areas on the east coast . . . polls and press should not be managing our forests. Trained foresters are the ones we should be listening to. (Individual, Three Forks, MT - #A697.15100)

**RATHER THAN RELYING ON PUBLIC COMMENT**

The Forest Service’s decision-making process needs a substantial overhaul. There will always be disagreement about natural resource management. The current “consensus” system gives veto power to extremists, who want to prevent all management activities. The current system of public involvement has largely turned technical decisions over to laymen, who do not have adequate backgrounds to make these decision. We don’t actively seek public involvement in complex technical decisions, like how to treat cancer or how to design the space shuttle. Why would the public be any better at making complex technical decisions about how to manage National Forests? Setting long-term goals for forest conditions and management programs is an appropriate role for the public. The role of technical professionals in advising the public regarding resource potential, management alternatives, and management effects and in determining how best to achieve long-term, public goals for the National Forest needs to be strengthened. (Individual, Bend, OR - #A702.15110)

The USFS is charged with managing our federal lands as professionals and is paid to do so, despite its trend towards shaking off responsibility and putting it on the shoulders of the “public.” Thank God the Military does not do this or other large federal agencies. Do your jobs and manage the lands as defined. If they are considered suitable for multiple use management, then do so and stop trying to find ways to take them out of production. Put all lands considered as roadless into the Wilderness system and lock it up. Reduce your staffs and concentrate on those lands the public has said can be managed and saved. You cannot waste time trying to appease all the public. It’s impossible. You are still land managers, not arbitrators. (Individual, Montrose, CO - #A370.15100)

**417. Public Concern: The Forest Service should comply with the law and use professional judgment.**

You should, honestly and with an open mind, listen to all of us, analyze our comments and act on our good ideas. You must comply with the letter and spirit of the law and make the best, unbiased and professional decision you can for the land, its resources and the American people. That’s why we pay for your professional services. We have an appeal process and courts to deal with our objections. (Organization, Boise, ID - #A17677.10131)

***Local Forest Planning Process***

**418. Public Concern: The Forest Service should recognize that the local forest planning process provides the best way to work with different groups.**

As in all instances involving limited resources and multiple channels of demand, there will never be a full agreement between all parties with an interest in the National Forest System. Therefore, CCA asserts that the USFS re-emphasize the local forest decision making process as the best possible means of achieving desired resource conditions. Furthermore, the solution to the problems inherent in the Roadless Area Conservation Rules lies in a healthy compromise between land use and environmental protection. The two can co-exist, with proper management and cooperation between the managing agencies and users of the land. (Business or Association, Sacramento, CA - #A3681.15160)

Sifting through competing values and limited resources is the price of living in a 21st Century democracy. When forest management issues are debated through national ruelmaking, the ideology

becomes more important than consideration of actual landscapes. Consequently, more decision-making at local levels allows Forest Service employees to consider competing ideologies measured against actual effects on the ground. Local decision-making offers more opportunity for consensus where stakeholders can find management alternatives that do not necessarily compromise their beliefs. Therefore, forest management issues such as managing inventoried roadless areas should, for the most part, be considered at the local level. (Business or Association, Washington, DC - #A17887.13110)

There will likely never be full agreement between all the parties interested in the national forests. The Forest Service should re-emphasize local forest-level decision making as the best possible means of achieving desired resource conditions. (Business, Rapid City, SD - #A30145.15160)

There will never be full agreement between all the parties interested in the national forest. **The national forests are multiple use lands and with effort and professionalism can be managed as such.** The Forest service should reemphasize local forest-level decision-making as the best possible means of achieving desired resource conditions. In addition, the Agency and Congress should ensure that there are enough staff and resource **in the field** so that forest plans are implemented and objectives are achieved. (Individual, Moose, WY - #A20339.15162)

#### **BY ALLOWING COMPETING VALUES TO BE IDENTIFIED LOCALLY ON EACH FOREST**

Competing Values and Limited Resources. Competing values must be identified on each forest and must be locally determined. The KNF should be forest specific, not regionally specific, as would be the case of the consolidation of the Kootenai and the Panhandle. Once competing values are identified, they must be prioritized. Local input is invaluable in this process. (Elected Official, Lincoln County, MT - #A18119.13110)

#### **BY ESTABLISHING LOCAL BOARDS TO MAKE DECISIONS**

The problem is not with establishing federal policy that will please all but in establishing local boards with authority to make decisions after hearings and public input. Then when they are properly taught, educated, and informed by the citizens and foresters, those boards can make the decisions that will build and strengthen the local forests and preserve the forest for future generations, and for the continuation of quality watersheds, recreation, grazing, mining, and the environment. (Individual, Gunnison, UT - #A25755.15162)

#### **BECAUSE ISSUES RELATING TO SPECIFIC AREAS CAN BE DISCUSSED**

The best way for the Forest Service to work with the variety of entities on the roadless issue is through the forest planning process. This way specific issues relating to specific landmasses can be discussed. Discussion of roadless areas, statewide or nationwide allows only broad emotional issues to be discussed. Generally these issues are not related to specific needs of the land or the people. (Individual, Dayton, WY - #A5074.13000)

### *Enhanced Collaborative Efforts*

#### **419. Public Concern: The Forest Service should manage conflicting interests.**

##### **BY EMPHASIZING COLLABORATION**

Collaborative efforts should be stressed. Individuals, organizations, and other affected parties must be able to discuss the management of local roadless areas through the existing forest planning process. . . Collaborative solutions should be developed even in the absence of complete "consensus." (Organization, Lake Isabella, CA - #A20945.15162)

##### **BY MAKING EVERY EFFORT TO MEET EVERYONE'S NEEDS**

The service must make every effort to meet everyone's needs. Certainly, not everyone will agree with every decision but, if all concerns/interests are addressed and efforts made to accommodate those interests are made, then the service has done its job. (Individual, No Address - #A50.15162)

**BY USING CONFLICT RESOLUTION STRATEGIES**

We recommend the use of conflict resolution strategies among stakeholders as one strategy to diminish conflicts. Persons used to resolve conflict should have the support of the affected parties before resolution strategies are employed.

Too often the agency accepts public comment in public meetings and allows for misinformation to build because inaccuracies are not corrected in public meetings. This passive approach allows the loudest and most prolific voices to prevail. After a period of public hearings and comment, if significant conflict remains, the agency should endeavor to resolve those conflicts through structured conflict resolution strategies among stakeholder representatives representing a balance of interests. (Permit Holder, Boise, ID - #A29589.15160)

The Forest Service should consider using arbitration or conflict resolution processes with representatives of diverse stakeholder groups, when appropriate, to resolve negotiable issues related to forest management. Also, lessons learned from local collaborative processes such as those being used with particular focuses/issues on the Nez Perce Forest in Region 1 should be examined for their levels of success. (Permit Holder, Boise, ID - #A29589.15162)

**BY ESTABLISHING LOCAL MONITORING TEAMS COMPOSED OF DIVERSE STAKEHOLDERS DEDICATED TO SUSTAINING ROADLESS ECOSYSTEMS**

Management innovations such as Reinvention should be encouraged to establish local Monitoring Teams comprised of diverse stakeholders beholden to the purpose and principle for sustaining roadless ecosystems. By clarifying and upholding clear purpose and principles, the strongly competing views will be superseded by these national scale values for roadless areas. These interests can have their way with the vastly more numerous roaded areas, where more diverse prescriptions and experimentation are warranted. (Individual, Cleveland, OH - #A26411.15160)

**BY USING PROFESSIONAL NEGOTIATORS, PUBLIC RELATIONS CONSULTANTS, AND CONFLICT RESOLUTION SPECIALISTS**

Employ professional negotiators, public relations consultants, and conflict resolvers. (Individual, Lolo, MT - #A111.15162)

To work with groups and people who want different things for/from the national forests (the key here being National, as in belonging to ALL citizens), the Forest Service should continue to educate the public on its goals and plans, and also should employ professional negotiators to work with groups of people EVERYDAY, not just when things come to a head. That encourages more communication, understanding, and learning across the entire community—even leading me on occasion to side with a lumber mill. (Individual, Bozeman, MT - #A285.15162)

**BY FORMING ADVISORY PLANNING GROUPS**

One way to assure that viewpoints be heard and recognized would be to format a hierarchy of the advisory planning groups, so that a number of the groups would yield a regional recommendation. The format would have to provide for dissenting opinions, possibly legitimizing the minority opinion by the regional body agreeing that it is a minority opinion, otherwise there could be any number of minority opinions which would not be helpful. (Individual, No Address - #A781.15100)

Advisory groups. The composition of said groups must consist of “all” interested parties. Balance of interests is mandatory. These advisory groups, operating on each forest, must be assured that their input is meaningful and not just window dressing. (Elected Official, Iron County, MI - #A3612.15120)

Each NF should have a Resource Advisory Council (like BLM’s RACs) to advise the S.O. and District Rangers on controversial natural resource management issues. 15 people, 5 each from 3 groups (commodity interest/environmental/local govt.-tribe). (Individual, Tucson, AZ - #A5625.15152)

Given the current lack of a political consensus to change the statutory framework, the Forest Service must adhere to the planning process mandated by NFMA. The potential to use forest level advisory committees, as envisioned by NGMA, may offer further opportunities to develop local community based solutions. (Organization, Chantilly, VA - #A3350.13200)

**420. Public Concern: The Forest Service should collaborate with special interest groups.**

**BY MEETING WITH THEM INDIVIDUALLY AND COLLECTIVELY AND DEVELOPING AGENDA ITEMS EQUALLY IMPORTANT TO BOTH**

Local Foresters should meet individually and collectively with the different interest groups that they work with. Foresters should develop agenda items that they would review with each group both individually and collectively. The agendas for each group must be exactly the same and not be tilted towards one special interest group or the other. Following individual meetings, a collective meeting, sharing all of the data openly with each interest group is also imperative. Preordained decisions and preconceived plans should not be allowed in this process. (Business, Haslett, MI - #A4861.15000)

**BY DEALING WITH ONE REPRESENTATIVE FROM EACH INTEREST GROUP**

The Forest Service should work with all groups by dealing with one representative of each “view”—not mass meetings where people are paid and bussed in to support a point of view. People simply have to be willing to listen to each other and compromise. The Forest Service should expect nothing less and should make this very clear from the onset. Representatives who are out of line should be asked to step down and a new representative should be requested from a group. Treat this like a meeting of foreign countries rather than a town meeting—it is probably closer to the first. (Individual, Holtville, CA - #A8729.15162)

**421. Public Concern: The Forest Service should advise groups that the fairest way of resolving differences is through compromise.**

Convince groups that compromise is the only way of being as fair as possible, and the only way of preventing bitter land use issues from becoming the source of future regional or localized civil unrest. A recognition of when extreme views demand an undue price from either the resources or those who most depend on them. MOST OF THE PUBLIC HAS LITTLE RESPECT FOR EXTREMISTS! THAT GOES FOR ENVIRONEMTALISTS OR RAPE THE LANDISTS. (Individual, Brimley, MI - #A3659.15160)

Simple compromise should prevail. Public input and small workgroups or task forces of interested parties may be the best resource for helping Forestry make its ultimate decisions. (Individual, Nashville, TN - #A874.15162)

**422. Public Concern: The Forest Service should recognize that interest groups must have an incentive to compromise.**

All of the diverse interests must have an incentive to resolve their beliefs. The preservation groups have no incentive to resolve their beliefs with other groups because as long as there is no decision on the roadless issue they win and the areas remain roadless. These groups will compromise only when they recognize the need for compromise. Industrial interests have more incentive to compromise at the local level because they have much more at stake. Congressional direction to resolve the issue through forest planning at the local level with judicial decisions backing up that direction may be the only method to arrive at a solution. Otherwise, this 30-year conflict will likely be around for a lot longer. (Individual, Moscow, ID - #A5380.15160)

If individuals and groups with diverse interests do not have an incentive to work together in a cooperative atmosphere, there is little the Forest Service can do to force cooperation. The Forest Service should proceed with planning efforts as specified in legislation. Until Congress acts and the judicial

branch recognized the validity of forest planning, the issue will remain. (Business or Association, Moscow, ID - #A5428.15160)

## *Public Education/Information Efforts*

### **423. Public Concern: The Forest Service should use public education to resolve conflicts.**

Managing forests for differing values is solely a matter of EDUCATION. It just so happens we folks who live in Rural Areas already value the forests for ALL THOSE DIFFERING VALUES, and understand fully HOW 'WE (all American) CAN ALL HAVE OUR CAKE AND EAT IT!' Education is the only thing that will ensure that has an opportunity to happen. (Individual, Forks, WA - #A877.15163)

#### **THROUGH FOREST RANGERS**

Having 'Forest Rangers' in the areas to assist in education would not only be helpful to the visitor but would help restore respect for the Forest Service. (Individual, Jarbidge, NV - #A8842.15163)

#### **THROUGH CLASSROOMS AND SERVICE GROUPS**

Education in the class rooms (fun elementary stuff) as well as a teenage service group within the agency (a quasi-scouting group from local high schools) would be a big help in introducing ideas to the young about the reason for certain decisions. By showing an interest in the youth, adults have a tendency to soften their stance. (Individual, Springfield, OH - #A12726.15163)

#### **THROUGH SEMINAR PROGRAMS**

There has been a surge of seminar programs by both government (state and federal) and by the private industry. This seminar type education seems to me a good idea because it is a very quick way to get various groups together with very little expense. One well educated man or woman that is educated in many fields can put on a program that has three or four (or more) to a group that other agencies are also interested in. (Individual, Celina, TN - #A11902.15163)

#### **BY ESTABLISHING A DEPARTMENT OF INFORMATION**

The NFMA must develop and employ a policy of public education so that states, organizations, individuals, tribes, etc. are aware of the status of these areas. They must be educated so that they know the reasons for the protected status. If an extensive public relations campaign, or a department of information is required, it should be established. This department, however, should have no decision making powers, but rather be in place to disseminate information to the public, and to gather public opinion. (Individual, Santa Barbara, CA - #A504.15163)

#### **RATHER THAN CLOSING ACCESS TO FOREST LANDS**

The management philosophy of the Forest Service seems to be that the only way to address a problem is by closing access to the forest. An approach that is more reasonable to the public including motorized visitors is to maintain recreation opportunities by addressing a problem through mitigation measures such as education, signing, seasonal restrictions, user fees, and structural improvements such as water bars, trail re-routing, and bridges. We encourage public agencies to support and use education as a means to address and mitigate problems rather than closures. Most user created problems can be addressed by education. Education should be the first line of action and all education measures should be exhausted before pursuing any other action. The elimination of much needed recreational opportunities is not reasonable without first exhausting all possible means of education to address the problem. Educational programs could include use of mailings, handouts, improved travel plan mapping, pamphlets, TV and radio spots, web pages, newspaper articles, signing, presentations, information kiosks with mapping, and trail rangers. Restrictions or closures are not always obvious to the public. Education can also be in the form of measures such as the use of jackleg fences with signs at the end of motorized trails in sensitive areas so that public is made aware of the end of the motorized trail and the surrounding area closure. The use of public education to address problems may require effort and time but it is more reasonable than closures and must be used fully utilized. Additionally, motorized visitors

can be called upon to help implement the educational process. (Organization, Helena, MT - #A13226.15163)

**424. Public Concern: The Forest Service should inform the public that national forests are not national parks.**

The USFS needs to undertake an educational campaign to inform the public that the National Forests are not National Parks and come under the concept of multiple use. The point needs to be made that the USFS is part of the Department of Agriculture because timber is an agricultural commodity. Timber production and the complementary goal of watershed protection, are the main reasons for the existence of a Forest Service. (Q9) (Individual, Ruidoso, NM - #A17775.15163)

*Forest Service Staff Training/Education*

**425. Public Concern: The Forest Service should manage competing interests.**

**THROUGH THE USE OF SCIENCE AND UNBIASED EMPLOYEES**

The most effective way to work with competing interests is to let sound science be the guide to decision-making that is made through public involvement. Unbiased USFS employees need to be sought for management. There has been too many USFS employees making a name for themselves as environmentally friendly and capitalizing on their biased decisionmaking when leaving public service. It ruins the agency's credibility and ability to make sound and reasonable decisions based on facts and public input. Our own Carson City office is deemed the "Headquarters for the Wilderness Society" by much of the general public in Nevada. (Individual, Sun Valley, NV - #A30102.15160)

A number of USFS personnel I've come in contact with over the years are clearly biased and are even anti-specific use. The Forest Service needs to determine who these individuals are and get rid of them or at least demote them to a position where they can do no harm. (Individual, Fraser, CO - #A30203.15152)

**BY CONSULTING WITH PERSONNEL WHO HAVE WORKED UNDER THE NORTHWEST FOREST PLAN**

You should consult with agency personnel who have been working under the Northwest Forest Plan. They have a lot of experience in dealing with various interest groups, one avenue being the PAC. (Organization, Port Townsend, WA - #A21695.15162)

**BY HAVING ALL FOREST SERVICE EMPLOYEES READ "A CONSPIRACY OF OPTIMISM"**

The agency must first begin by recognizing its own vested interests in certain kinds of organizational systems, management structures, and management methods. The agency is not a neutral arbiter amongst competing interest, but rather, has its own interests that are too often allied with private industrial users at the expense of all other citizens, interests and values. To date, despite glowing rhetoric about the need for greater collaboration and partnerships in planning and decision-making, the agency's actions betray a continuous interest in asserting technocratic power and control over the land and people. The RACR is not the proper avenue for managers to relearn how to "care for the land and serve people." The problems of Forest Service management extend far beyond the roadless area issue. We recommend that as a first step all forest Service employees should read Dr. Paul Hirt's excellent critique of Forest service management, "A Conspiracy of Optimism." (Organization, Eugene, OR - #A21798.12230)

**426. Public Concern: The Forest Service should employ a diverse staff.**

**BY HAVING AS MANY CONSERVATION BIOLOGISTS AND EDUCATORS/NATURALISTS AS FORESTERS ON ITS STAFF**

Develop more diversity within the ranks of the Forest Service and reach out to groups and individuals that you have not traditionally attempted to contact. Diversity can be created in the professional staff of the Forest Service. Every national forest should have as many conservation biologists and educators/naturalists as foresters on its staff. It should also attempt to recruit employees from all backgrounds and with all political beliefs. The Forest Service is still too much of a "good old boy"

organization and it needs to become more representative of the American public. (Individual, Waterbury, VT - #A15433.15164)

#### **427. Public Concern: The Forest Service should educate personnel.**

##### **TO UNDERSTAND THAT COMPETING INTERESTS ARE NOTHING NEW**

Reeducate the United States Forest Service employees that “competing values and limited resources” is NOTHING NEW. They act and manage as though it is. (Business or Association, Cody, WY - #A26503.15164)

##### **TO ADEQUATELY UNDERSTAND POLITICAL, MANAGEMENT, AND LEADERSHIP ISSUES**

The Forest Service must better understand political, management, and leadership issues of working “effectively with individuals and groups with strongly competing views, values and beliefs.” There is little evidence that that agency has given much thought to these complexities; hence most agency engagement tends away from collaboration and engagement and toward older forms of command and control behavior—often thinly camouflaged with language hinting at collaboration and positive interaction in search of public interest. The Forest Service must also put aside its own vested self-interest if it is to have any chance at working effectively with all parties. (Union, Eugene, OR - #A6245.15160)

##### **TO WORK WITH A DIVERSE CONSTITUENCY**

For future decisions, one must do extensive training for Forest Service personnel so they can begin to understand how to work effectively with a diverse constituency. (I apologize for picking on the Forest Service regarding public involvement—the agency does far better than other federal, state, county and city agencies—it is a truly tough job. (Individual, Olympia, WA - #A4503.15150)

Facilitation training should be increased within the Forest Service to improve the ability of Forest Service planners and line officers improve their effectiveness in leading meetings at which a diversity of interests and views are represented. The use of facilitators from outside the agency should also be considered in meetings that may become contentious. (Civic Group, Roanoke, VA - #A1713.15164)

##### **TO FACILITATE COOPERATIVE MEETINGS**

It is the job of the Forest Service to foster cooperative meetings where opposing needs and views can be expressed and respected. Expressing a willingness to hear all views and to accept proposals as potential solutions is a powerful way to encourage cooperation. Forest management is not just for trees.

There is training available in a class once called “Negotiating to Yes” that should be given to all Forest Service staff and used in this pursuit. Dale Carnegie classes are another good resource. (Individual, Salem, NH - #A8263.15160)

### *Will of the Public/Elected Representatives*

#### **428. Public Concern: The Forest Service should abide by the wishes of the majority.**

The Forest Service should do what the majority of Americans want done with their federal wildlands. The USFS should question and poll the American public to find out what they do want. Limiting the breadth of such an outreach for comments at the city limits of local communities is a crime. Whatever Administration is in power should accept that. Clearly, the majority should rule. (Individual, Grangeville, ID - #A830.15100)

Last time I checked the United States was still a democracy. The people have spoken, and there is no compelling national interest of which they are unaware that could possibly justify ignoring them. Do so at your peril. (Individual, Nickelsville, VA - #A347.15110)

An opportunity for all people to voice their concerns should be met with decisions made based on the majority not by snowmobile or 4 wheelers spending money to be heard louder. (Individual, Livingston, MT - #A661.15110)

#### **BY PRESERVING ROADLESS AREAS**

The viewpoint of the majority, especially a clear majority, should be accepted. Thousands of citizens have indicated that they want our National Forest roadless areas preserved. (Individual, Fairhope, AL - #A13377.15165)

The ANPR specifically states that 9 million acres within IRAs are considered by the Service to be productive timberland and candidates for road construction. The point of a national standard is the recognition that the vast majority of American citizens recognize a value other than extractable resources in our public lands—let's leave the IRAs alone! (Individual, Seattle, WA - #A17840.15165)

#### **BECAUSE NATIONAL FOREST SYSTEM LANDS ARE OWNED BY THE MAJORITY**

We live in a democracy and the Forest Service should give weight to the overall opinions of all Americans. After all these lands belong to all individual citizens of the U.S. and the interests of a few special interest should not dominate over those of the majority. Splitting the baby in half (so to say) is not the way to go and will only lead to more degradation of these unique and limited lands. (Individual, Takoma Park, MD - #A16325.15165)

#### **RATHER THAN THE PRESIDENTIAL ADMINISTRATION**

The forest service can work most effectively to meet competing views by following the views, beliefs and guidance of the public majority. The public majority has spoken during the first USFS solicitation of public comment and that majority overwhelming favored roadless protection. Unfortunately, the forest service has bowed to the biased pressure of the new presidential administration and ignored the guidance of the public majority. (Individual, Petaluma, CA - #A17057.15110)

#### **RATHER THAN PRIVATE INTERESTS**

The Forest Service should step up to the plate and protect the public interest, as opposed to competing private interests in the forest. Had they been doing so, we would never have been at the point where we are, with so little native forest left in this nation. The Forest Service should abandon its proclivity to be a front for the timber barons and to return to the mission originally envisioned for the forests [by] Teddy Roosevelt and Gifford Pinchot. (Individual, No Address - #A16452.15165)

#### **RATHER THAN SPECIAL INTEREST GROUPS**

You need to allow the American public, not special interest groups dictate the policies of the Forest Service. Please allow us access to public property so long as we use it responsibly. (Individual, Las Vegas, NV - #A921.15100)

. . . “our” National Forests are truly the property of all our citizens. Not the property of extractive industry. I don't think that I would want someone digging around in “my” backyard. It would not be a good idea to do this on the part of the digger.

It is my understanding that Mr. Bush is making an attempt to open my “backyard” to the financial gain of private industry. I see that as theft. (Individual, Harmony, MN - #A43.15110)

This clearly indicates that changes being proposed may be in the interests of business and special interest groups, but that the will of the people as expressed in hearings has been demonstrated to support upholding of the present rule.

Please listen to and honor the will of the people and do not give in to profit-driven concessions which are being requested by business interests. The forests are a very precious national resource which should be managed in the interests of the people of the United States. (Individual, Concord, CA - #A238.15110)

What is NOT acceptable, is for powerful corporate and special interests to override the views of me and my neighbors with their own agendas, though this continues to be the disturbing political reality in many of these issues. (Individual, New Haven, CT - #A706.15120)

Extreme environmental groups, under the guise of conservation, will never let up pressuring land managers to comply with their hidden agenda. If they were to reach a compromise, they would not have a reason to secure and spend the incredible funding they routinely obtain. The average, forthright, accountable, American citizen relies on the FS to fairly and equitably administer public lands without bowing to the biased pressure of high volumes of post cards, form letters and e-mails, just because one group may be more organized or highly funded than typical Americans. (Association, Salt Lake City, UT - #A12009.15121)

#### **RATHER THAN MERELY AVOIDING LITIGATION**

I attended a public meeting where a USFS official indicated that one of the reasons the 'roadless' rule was under consideration was because the USFS was continually being sued over its decisions to allow certain activities. That is the weakest reason I've ever heard for instituting a public policy. Policy should be established by what is in the public best interest, not by willingness to litigate. (Individual, Anchorage, AK - #A22124.15165)

#### **WHILE PROTECTING MINORITY RIGHTS**

The Forest Service has a very tough job in working this out. Our tradition is majority rule while protecting minority rights. These are federal lands, so the majority involves the American people, not just one state. So the Forestry Service needs to understand what most Americans want, and do its best to implement those wishes without unjustly affecting the rights of the minority. (Individual, Saratoga, CA - #A22433.15165)

### **429. Public Concern: The Forest Service should allow elected officials to make decisions.**

I feel a compromise must be made somehow. Let Jim Hansen decide for Utah . . . for the rest of the states . . . let their rep. figure it out. Special interest groups and lawyers don't belong in the process . . . elected/appointed officials do. Heaven help us with groups out there like the Sierra club, Utah wilderness Club, and Utah Wilderness Coalition. If they had their way, they'd drain lake Powell . . . what's next??? (Individual, Ogden, UT - #A590.15100)

Certainly we agree that reliable information and accurate mapping, and drawing on local expertise and experience through the local forest planning process is important. However, in the past federal agencies have failed to recognize the republican form of government in which we operate. Instead most decision making within the federal government says each person commenting equals one vote. In fact comments from local governments in our form of government says that those elected local officials should represent, for example, in a county of 10,000 people as a constituency and therefore their position represents 10,000 votes. Environmentalists have been appointed by no one, and they have no constitutional or elected power to represent anyone. They are accountable to no one. In that light then informed decision making must include the fact that when San Juan County speaks it is with the force of roughly 14,000 people. If that rule is not adhered to then there is no **informed decisionmaking**. (Elected Official, San Juan County, UT - #A4890.15111)

It is time for our elected and appointed officials to act as guardians of our land. This will take strong people because those interests who have exploited the lands for years are well entrenched, are very powerful lobbies, are willing to spend millions in order to ensure they can continue to exploit the lands so as to benefit financially. Ironically, some individuals and companies who have used but not abused the public lands in their pursuit of utilizing natural resources are forced to compete with the abusers and often, for survival, must themselves exploit the public lands. It is people such as yourself who must set the stage for conservation and allow the use of public lands but prohibit the abuse of these same lands.

At the same time, it is imperative to isolate some of these lands by designating them as roadless areas. (Individual, Laramie, WY - #A998.15120)

## *Ecosystem/Preservation Values*

### **430. Public Concern: The Forest Service should place the highest value on ecosystem preservation when managing conflict.**

Once a roadless area becomes roaded, it changes its identity and cannot be returned to its prior condition. The Forest Service should set its priority as preservation of the roadless condition and then reconcile the wants of different people to the first priority of preservation. (Individual, Bozeman, MT - #A282.15167)

Competing stakeholder interests - The U.S. Forest Service has a challenging, deeply political job. I would encourage it to manage its difficult stakeholder relations with the following guidance in mind: make decisions based upon the respect for the other living things with whom we share this planet; make decisions recognizing that scarcity warrants additional consideration (late seral habitat, disappearing species, quiet places), make moral not just economic choices, make decisions recognizing that man can make its living elsewhere but forest animals do not have that choice. (Individual, Lacey, WA - #A530.15167)

The forest service should err on the side of caution. If two parties are split as to whether a roadless area should be opened for roads, or left roadless, the choice which is ultimately made must be in favor of the "roadless" option.

The reason for this is clear: A roadless area which is exploited today cannot also be exploited tomorrow. ON the other hand, if a roadless area is left alone for a year, or for ten years, it can eventually be opened up for roadbuilding. By erring on the side of caution, you merely put off a decision until another day. By ignoring pleas to keep areas roadless, the roadless area is destroyed forever. (Individual, Columbus, OH - #A659.15162)

#### **BY BEING A STEWARD OF THE FORESTS AND AN ADVOCATE FOR WILDLANDS**

One comment point was how to work with diverse groups of differing opinions. First, what is the goal of the Forest Service? I believe that the Forest Service should be a steward of the forest and an advocate for wild lands. I believe that the native tribes, and the public should be included in the decisions concerning the public lands. Diverse opinion will always occur, State and Local communities should have a say, but they should not control or dominate the process. (Individual, Boise, ID - #A209.15160)



## Chapter 4

# Roadless Area Values (Question 6)

**Question 6: Describing Values.** What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates inventoried roadless areas?

This chapter includes five main sections: Characteristics of Roadless Areas, Environmental Values, Social Environment and Values, Economic Environment and Values, and Heritage Resources.

## Characteristics of Roadless Areas

This section includes three subsections: Characteristics of Roadless Areas General, Adequacy of Maps and Inventories, and Definitions.

### Characteristics of Roadless Areas General

#### Summary

**Evaluation of Roadless Areas** – Roadless area values and characteristics are a topic of comment to many respondents. Numerous respondents offer lists of values and characteristics they personally associate with roadless areas. Several people advise the Forest Service to undertake a comprehensive evaluation to determine roadless area characteristics and values. Others propose that the Forest Service consider current physical and geographical characteristics when these areas are evaluated. The values mentioned in this section are mostly those of roadlessness, rareness, location, and values in conjunction with a full range of uses. Reference to other roadless area values and characteristics, such as environmental, social, and economic values, can be found throughout the document in those related sections. A number of people comment that roadless area values were considered during past public planning processes, including the RARE processes, and that reconsidering these values now is a waste of time and money. Additionally, some suggest that certain values should not be considered now or should be considered in a separate process from other inventories or assessments.

**Adequacy of Analysis** – Respondents question the definitions of roadless area “values” and the analysis that will follow based on those definitions. For example, one respondent advises the Forest Service to define roadless values in a context consistent with other aspects of land and resource management plans. Others allege that the Forest Service is deliberately misleading representation of the inherent values of roadless areas regardless of their wilderness potential, and in so doing fails to provide a balanced recital of ecological services. Others request the

Forest Service examine the definition of various values, including perceived value, social value, and ecological value.

## *Evaluation of Roadless Areas*

### **431. Public Concern: The Forest Service should clearly state the benefits of having roadless areas.**

If we are locking these areas away for some reason, it should be explained fully and the benefits to the nation should be obvious. Someone should state the benefits of having roadless areas at all. (Individual, Olympia, WA - #A444.10112)

### **432. Public Concern: The Forest Service should undertake a comprehensive evaluation of roadless areas.**

#### **TO DETERMINE THEIR CHARACTERISTICS, RESOURCE VALUES, AND EFFECTS OF VARIOUS ACTIVITIES**

The following are some of the above categories you should address: 1. Inventory uses currently taking place that have not compromised the unit's roadless character. If their impacts have been acceptable in the past, there is no reason they shouldn't be acceptable in the future under managed conditions. 2. What activities take place on the roadless unit that are traditional and important to local culture; what role do these activities play in local economics? 2. What resources are present and how important are they to the local area and the nation? For example, the presence of important minerals might outweigh other concerns. Grazing might support local ranches. Wood harvest might stabilize raw material supplies for local mills. 4. What is the long-term effect of making resources on roadless lands essentially off limits, locally and nationally? Will more pressure be placed on commodity production from other countries without effective environmental protections? 5. Are the units identified as roadless in the inventories actually roadless? Some should be reviewed. Some units may be dropped and some might be added. 6. What recreation activities can be accommodated to given levels without unacceptable resource impacts? 7. What unique, sensitive, threatened or endangered species are present and how does the roadless area fit into its habitat picture? What activities can take place without causing harm to those species? 8. What is the relationship of the roadless unit to other lands, public and private; how might the roadless unit's management affect these lands and the uses they support? 9. What is the relationship of the roadless unit to adjacent special areas, including wilderness? 10. What is the relationship of the roadless unit to transportation systems, existing and planned, summer and winter? 11. What are the special environmental considerations, such as sensitive watersheds or unstable soils? 12. What is the best way to manage this unit of land in the public's interest? 12. Can the roadless unit be sustained in a healthy condition that doesn't pose threats to adjacent lands and resources? 14. What are the recreation opportunities the unit can provide under various management alternatives and how do these fit with the spectrum of opportunities in the region? 15. Does the unit have outstanding characteristics which make it suitable for addition to the wilderness system? 16. Does the unit have characteristics which make it outstanding as a place to conduct various recreation activities enhanced by a roadless setting, such as hunting, fishing, trail riding, sightseeing, rock climbing, etc. (Organization, Sandpoint, ID - #A6614.10110)

#### **TO CONSIDER SIMILAR CHARACTERISTICS**

In evaluating roadless areas, the Forest Service should always consider certain similar characteristics. These characteristics may be as minute as the space between varying species of trees and plants, or as inclusive as the overall appearance and health of the forest area. Regardless of scale, characteristics of the inventoried roadless areas should remain somewhat constant in representing the best interest of the forest.

Environmental values can play a bit more of a biased role in evaluating forest area. The main concern is the health of the ecosystem, yet it can be skewed as overprotection of resources. The concept is to keep roadless areas set aside for rare species, remote habitats, and free growth of the forest.

Representing different values, social and economic considerations can sometimes play against the greater interest for the forest. Social aspects of the situation might include accessibility, location, and natural appeal. Certain areas are more sought out than others due to natural beauty. Economic considerations might include the amount of timber in a certain area, or other resources. In order to better access the timber, more roads must be put in. Although, it seems that the best wood for timber surrounds the already existing roads, since those trees are younger and better kept.

Overall, the Forest Service should always look for certain factors while evaluating roadless areas. First, the area should be graded—so to speak—on the health of the forest. All species present should be taken into account. After assessing the health, areas should be checked for possible improvements. Most importantly, all plans for action in the forest should be aimed at sustaining the most ideal conditions. (Individual, Harrisonburg, VA - #A30138.45100)

### **433. Public Concern: The Forest Service should consider how roadless areas are characterized in evaluating roadless areas.**

#### **BY A WIDE RANGE OF FEATURES AND ATTRIBUTES**

What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates inventoried roadless areas?

This list might include; a. A complete inventory of renewable resources and production capability including forage, timber, fish and wildlife. b. An inventory of soil, water and geologic resources; an evaluation of their stability and suitability for various activities. c. An inventory of mineral resources. d. An inventory of sensitive, rare, threatened, or endangered species and their habitat. e. An evaluation of current activities and their impacts on the land and its resources. f. An evaluation of seasonal suitability for various activities, including motorized and non-motorized recreation. g. An evaluation of how potential recreation opportunities on the unit fit into or complement the regional spectrum of opportunities. h. An evaluation of forest health and fuel loading. i. Land ownership in and adjacent to the unit. j. A complete evaluation of the transportation system in and adjacent to the unit. k. Its proximity to designated wilderness and other roadless units. l. A thorough evaluation of renewable resources, productivity, sustainability and the importance of these at a sustainable level to local communities. m. Hazards to adjacent lands posed by various management alternatives. n. How is this unit of forest best managed in the public's interest, local and national? o. How important is this unit of forest to the long-term stability of local communities? p. What is the availability of roadless recreation opportunities in the region and are more needed? q. Can the roadless unit be managed in a healthy condition that doesn't pose threats to surrounding lands? r. What is its size and conformity; does it lie adjacent to designated wilderness; does it contain outstanding wilderness characteristics? (Individual, Boise, ID - #A5165.45100)

A more complete list might include: a) An evaluation of forest health and fuel loading, including forested areas at high risk from catastrophic wildfire. (Association, Coeur d'Alene, ID - #A22058.45100)

This list might include:

19. How will vegetative management options impact air and water resources?
20. What is the burning window for fuels treatment? (Association, Spokane, WA - #A21364.45100)

Relevant physical characteristics for the second-stage roadless area evaluations [following evaluation for wilderness designation] include, but are not limited to: ecological type, topography, soils, vegetation type and structure, wildlife, existing trails and other facilities; existing classified and unclassified roads, existing or potential old growth stands; streams and watersheds, TandE and sensitive species or communities, fire hazard rating, insect hazard rating, disease hazard rating, and proximity to private developments. (Civic Group, Roanoke, VA - #A1713.45100)

**BY THEIR INACCESSIBILITY**

There is very little private property adjacent to the roadless areas; the roadless areas are characterized by their relative inaccessibility. (Individual, Troy, MT - #A895.45100)

**BY BARREN LANDSCAPE, SCRUB-BRUSH, ROCK, AND ICE**

It should be pointed out that a minimal amount of productive old growth, low elevation forest was included in the Tongass Designated Wilderness areas. The vast majority of the "protected" lands in these units are barren landscape, scrub-brush, rock and ice in spite of the large appearing areas on the map. This mix is true in Region 1. As an ex-smokejumper I have had a birds-eye view of the composition of Wilderness Areas throughout Idaho and Montana. (Individual, Sitka, AK - #A1056.45100)

Also, these areas are not the pristine, remote, untouched back country that some imply that they are. Many are readily accessible to the general public by vehicle, etc., and have been for years; they are not all forested - many are front country scrub lands with few if any trees on them anywhere. If the general public really knew the truth about these areas, they wouldn't be so eager to blindly support any special classification for them. (Individual, East Kingston, NH - #A4893.45000)

**434. Public Concern: The Forest Service should consider various values when evaluating roadless areas.****THE VALUE OF ROADLESSNESS**

Roadlessness is a value in itself that should be conserved. Administrative costs for roadless areas will be lower than on more intensively-managed lands. (Individual, Lexington, VA - #A16989.45100)

The primary characteristic should be roadlessness, for reasons mentioned in the May 2000 DEIS. Roadlessness by itself is rare enough that no additional characteristics are needed to make an area special. (Individual, Oberlin, OH - #A16281.45100)

The ultimate consideration, to me, is the fact that no matter what values you associate with a roadless area, once a road incurs upon that area, the values are lost forever. This should be the cautionary guide you use to help you protect roadless values. (Individual, Lewiston, ID - #A29569.45100)

**THE VALUE OF RARENESS**

I believe these intact areas should be preserved in their natural state precisely because so few areas in the world remain intact. I believe this is their most valuable use to mankind, in both an aesthetic and economic sense. Rareness creates economic value, and an economy, based on those who come to see, live close to, study, or otherwise benefit from that rareness. (Individual, Sitka, AK - #A15506.45100)

The value of roadless areas lies in the very fact that they are unroaded. Some are more aesthetically pleasing than others but we have so few roadless areas left that they should all be left intact. Near me in the Eastern Hiawatha National Forest is the only roadless area here. It is not valuable because of its unusual beauty but because it is roadless [and] relatively rare. (Individual, Brimley, MI - #A15719.45100)

**THE VALUE OF REMOTENESS**

When evaluating Roadless Areas, the Forest Service should consider:

The remoteness of the roadless area (is it located near large cities, how many miles is it from the nearest metropolitan area with a population larger than 30,000). (Individual, Des Moines, IA - #A12587.45100)

**THE VALUE OF PROXIMITY TO COMMUNITIES**

Location. If an IRA is close (within eyesight) to a community, it has a higher value because it provides a backdrop or otherwise helps to physically define the community. It becomes part of the character of the community, and people identify with it and value its presence.

If an IRA is located on a Forest boundary (or a county, state, or international boundary), it has a higher value because it serves multiple publics. This recognizes that more people identify with a “shared” IRA and take pride that it’s “in their back yard.” (Individual, Libby, MT - #A2301.45100)

#### **THE VALUE OF THE OVERALL LANDSCAPE**

Roadless values should also be described in terms of the overall landscape. The present RACR views roadless areas as “islands,” and imposes a management prescription on those islands without any reference to how that management prescription connected with the broader landscape.

A much more sustainable approach to forest management would be to recognize that roadless areas are not “islands” valuable solely for their lack of roads, but instead are an integral part of a larger management scheme. In many areas, a landscape approach may determine that overall road density, rather than the presence of roadless area “islands,” is a better indicator of overall forest health and ecological sustainability. (Governor, State of Idaho - #A20141.45100)

#### **THE VALUES ASSOCIATED WITH WILDERNESS AREAS**

What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates roadless areas?

Is it truly a wilderness with very limited access or is it an area with other than wilderness values. (Individual, Sparks, NV - #A4805.45100)

When evaluating Roadless Areas, the Forest Service should consider:

The management prescriptions of areas contiguous with the Inventoried Roadless Area (is there a designated Wilderness contiguous with the area, etc.). (Individual, Des Moines, IA - #A12587.45331)

#### **THE VALUES ASSOCIATED WITH ROADLESS AREAS CONTIGUOUS TO AREAS WITH SPECIAL CONGRESSIONAL DESIGNATIONS**

Wherever a roadless area contains or is contiguous to a Congressionally designated feature (such as a national scenic trail, a wild or scenic river, or wilderness), the particular values associated with such areas should be emphasized. The presumption in all such cases should be that the roadless area at issue must be retained in roadless status. (Organization, Baltimore, MD - #A892.45000)

#### **INTANGIBLE AND TANGIBLE VALUES**

It is difficult to compare intangible values (such as wilderness) with tangible ones (timber value) but the forest service must in all of their decisions. Not only must it consider the present value of the intangibles but the future value as well which will only increase exponentially with population growth. The intangibles not only include wildlife habitat, clean water, clean air, but view-shed, sound-shed, and the ability of a person to escape into wilderness. (Individual, Glide, OR - #A22303.45100)

#### **IN CONJUNCTION WITH CONSIDERATION OF A FULL RANGE OF USES**

I feel that the full range of values normally associated with any tract of forest land should be evaluated. Roadless areas have opportunities for roadless recreation, specialized wildlife habitat, and other values that may not be available in roaded areas. These values should be evaluated but the roadless character should not preclude consideration of a full range of uses, including uses that would require development of roads or other access. The evaluation must be site specific and must be based on an updated mapping of National Forest roadless areas based on national criteria direction for delineation of an area as roadless. Delineation criteria must be open to public involvement and all future mapping must be “ground proofed”, again through an open process. (Individual, Colfax, WA - #A5421.45100)

The full range of values normally associated with any tract of forestland should be evaluated. Roadless areas have opportunities for roadless recreation, specialized wildlife habitat, and other values that may not be available in roaded areas. These potential uses deserve special evaluation, but the roadless character should not preclude consideration of a full range of uses, including uses that would require development of roads or other access. The evaluation needs to be site specific in the context of the value and use of the adjacent areas. In context with questions 3 and 4, above, the evaluation should include full

disclosure of the consequences of various management strategies on forest health and the susceptibility to fire damage. There should be specific identification of the potential impacts on adjacent private and public lands and communities. (Individual, Lawrenceville, GA - #A6196.45100)

Inventoried roadless areas have been subject to in-depth analysis and evaluation since the first Roadless Area Review (RARE I) in 1972. During development of the forest plans, the presence or absence of a road did not exclusively drive the decisions on land allocations, but more appropriately, decisions were based on examinations of the full range of values on these lands. This should be the same for future amendments and revisions of the plans. (Association, Augusta, ME - #A13312.45500)

The full range of values normally associated with the evaluation of any area of national forest land should be considered during planning for roadless areas. The mere fact piece of land contains no roads does not automatically mean it possesses inherent values that demand special protection. In an open process the Service should consider such things as existing and potential uses of roadless area, potential and actual impacts of roadless designation on both forest users and the local communities, proclivity to fire, insect and disease and impacts to surrounding tracts of land, whether public ally or privately owned, just to name a few. The evaluation needs to be site specific and include a full range of uses, among them full development To undertake this process up-to-date information is needed along with new criteria for defining a roadless area. Areas that are currently roaded (Not just by the new definition of a road) should be removed from the roadless area designation. (Business, Alturas, CA - #A17770.45100)

**435. Public Concern: The Forest Service should document the other major values and opportunities provided by roadless areas.**

We advocate consideration not only of roadless values in hearings and comment period. In addition there should be full documentation of the other major values and opportunities provided by these areas. These include groundwater recharge; erosion reduction and control; headwaters fisheries benefits; extensive outdoor recreation; visual amenities; wild animal resources; wild plant resources; select areas for endangered plant and animal resources; satisfaction of over twenty laws relating to biodiversity; and historical and spiritual values. (Civic Group, Roanoke, VA - #A1713.45100)

**436. Public Concern: The Forest Service should not allow the presence or absence of roads in an area to overshadow the appropriate consideration of other values.**

**SUCH AS HEALTHY FORESTS AND WILDLIFE HABITAT**

We are concerned that the presence or absence of roads in an area will overshadow the appropriate consideration of other values such as healthy forests and wildlife habitat. As an example, if an area is inaccessible for management, there may be a significant loss of important wildlife habitat through canopy closure. At the forest plan level, the analysis must consider these changes in wildlife habitat versus the need or desire to keep the area inaccessible. We do not feel that such analysis and consideration of site specific impacts can be done at the national level. In addition, forest plan analysis must consider other factors such as, water quality, scenic values, access to non-federal land, reliable and consistent supply of fiber, and a variety of recreation opportunities. Economic and social relationships should also be evaluated, including those that directly impact working families and local communities. (Association, Rockville, MD - #A13306.45100)

**437. Public Concern: The Forest Service should publish a compendium of submitted roadless values.**

**WITHOUT COMPILING ANY SCOREKEEPING STATISTICS**

First, invite public comment, asking individuals and other interested entities to list any number of different attributes and inherencies of roadless areas that are of interest/importance to them. Then compile a probably very lengthy inclusive list of these, which are in effect "roadless values". Then

publish the list for public review. Everyone will no doubt be surprised at some of the things that others favor as “roadless values”. For example, a prospector might highly value the generally less explored nature of inventoried roadless areas (IRA). A marriage counselor might have found that encouraging troubled couples to go hiking/camping in roadless areas has been productive. A published compendium of all submitted “roadless values,” presented without any scorekeeping statistics as to which were more often mentioned, could be useful in many ways, not all of which are predictable. Unanticipated benefits to any rulemaking process may occur from this proposed approach to saying what “roadless values” are. (Individual, Kalispell, MT - #A19139.15100)

**438. Public Concern: The Forest Service should periodically reevaluate roadless areas.**

**TO ASSESS CHANGE AND POTENTIAL IMPACTS TO ADJACENT NONFEDERAL LANDS**

Many factors need to be addressed before the Forest Service evaluates inventoried roadless areas. While those factors need to be consistently applied, local values and community social and economic considerations need to be made. These factors include past management activities, current land use, wildlife habitat and endangered species, cultural resources, accessibility, juxtaposition to development, timber production potential, water quality and quantity, fire hazard, potential for epidemic insect or disease outbreak, economic impacts, invasive plants, and recreational opportunities. These characteristics should be reevaluated periodically to assess change and potential impacts to adjacent nonfederal lands. (Governor, State of South Dakota - #A23354.45100)

**439. Public Concern: The Forest Service should consider that roadless area values were already identified.**

**DURING THE RARE PROCESS**

The characteristics, environmental values, social and economic considerations and other factors the FS should consider as it evaluates inventoried roadless areas were identified starting with RARE in 1972 and during the 27 years that transpired between the initiation of that process and the publication of the Roadless Area Conservation DEIS and FEIS. The answers to Question 6 are found in those documents. (Individual, Klamath Falls, OR - #A4970.45100)

**IN PREVIOUS PUBLIC COMMENT PERIODS FOR THE ROADLESS AREA CONSERVATION RULE**

The public process for the Roadless rule, conducted by the Forest Service, already identified roadless area values, including, large undisturbed landscapes, safe drinking water, recreation, rare wildlife habitat, weed and pest control, scientific study, and Native American observances. (Individual, Johnstown, PA - #A4762.45000)

The Forest Service has already adequately identified roadless area values through the public involvement process for the Roadless Area Conservation Rule. I believe roadless areas should:

- Provide sources of clean drinking water;
- Protect water quality for fishing and swimming;
- Function as biological strongholds for rare and native wildlife;
- Provide large, undisturbed landscapes important for protecting the web of life;
- Present quiet, back-to-nature opportunities for stepping outside of the hustle and bustle of daily life;
- Serve as barriers against the spread of weeds and pests into pristine areas;
- Offer opportunities for scientific study and research;
- Provide open space, clean air, biological diversity, and unspoiled vistas;
- Be free from logging, mining, gas and oil development or exploration, or other resource extractive activities;
- Preserve areas needed for traditional Native American religious and cultural observances.

Monetary values for such things are difficult to measure in today's financial definitions. These things listed above mean far more to me than resource extractive activities would. Yes, I use wood, oil, and gas, but there are already designated areas in the country for these activities to be undertaken which minimize the impact on nature, health, and the ecological system. There needs to be a balance, and the Roadless Area Conservation Rule moves to achieve that. Pristine, roadless, natural areas are hard to come by, especially around where we live, and I place a very high value on them. Once they are disturbed, they never fully recover. Ecosystems are unbalanced and the web of life is disturbed. (Elected Official, Urbana, IL - #A4881.45100)

The Forest Service has already adequately identified roadless area valued through the public involvement process for the Roadless Area Conservation Rule. Roadless areas include the economic benefits associated with:

- 1) recreational opportunities and tourism;
  - 2) commercial and recreational fisheries within the boundaries of National Forests and downstream and offshore;
  - 3) habitat for important game species and hunting both within and outside of the National Forests;
  - 4) water for cities, industries, businesses, and individual households downstream from the National Forests;
  - 5) the regulation of water flowing through rivers and streams, including flood control;
  - 6) non-timber forest products such as wild mushrooms, herbs, and medicinal plants;
  - 7) mitigation of global climate change through absorption and storage of vast amounts of carbon;
  - 8) enhancing the quality of life of neighboring communities;
  - 9) harboring biological resources that either have value now or have as yet unknown but potentially large economic and social value;
  - 10) harboring biological and genetic resources that can improve the long-term productivities of all forest land;
  - 11) pest-control services provided by species that prey on agriculture and forest pests, and;
  - 12) pollination services provided by species that pollinate important forest and agricultural crops.
- (Individual, Santa Fe, NM - #A22971.45100)

With one exception, there is no reason for further evaluation of inventoried roadless areas; the current rule already has taken these considerations into account. The single exception is if we want to expand the roadless areas. Otherwise, implementation of the rule as it is currently written is the best way to accommodate these considerations. (Individual, Denver, CO - #A12861.45000)

What were the values used to formulate the policy that you are trying to gut? It would take pages to adequately answer this question. The bottom line is that detailed values were laid down after 600 public meetings and the initiative as it stands now was a logical outcome given those values. Those values should be adhered to and not replaced by values skewed to favor those who would benefit economically from more roads. (Individual, Bozeman, MT - #A15299.45000)

The values that must be followed are the ones outlined in the original roadless area proposal. Get a clue—over a million people spoke up in support of a vast roadless area, this should be proof enough that millions more Americans favor and embrace environmental ethics that applaud natural beauty, abundance, and variety. The world we live work in should be respected and protected, not exploited and destroyed. (Individual, Colorado Springs, CO - #A17259.45000)

**AND IT IS A WASTE OF TAXPAYER MONEY TO UNDERGO ANOTHER PROCESS TO CONSIDER EXACTLY THE SAME VALUES**

The Forest Service has already extensively analyzed the values of roadless areas and weighed the benefits of protecting them in the process of promulgating the Roadless Rule. It is a waste of taxpayer

money to undergo yet another process to consider exactly the same values considered the last go round. (Organization, Boise, ID - #A8240.45000)

#### **ROADLESS AREA EVALUATION IN WYOMING WAS CONCLUDED WITH THE PASSAGE OF THE WYOMING WILDERNESS ACT**

The advance notice of proposed rulemaking dated July 3, 2001 states “The Forest Service has been evaluating roadless areas for nearly 30 years”. While this may be true Service-wide, this effort was concluded in Wyoming with the passage of the Wyoming Wilderness Act of 1984 (Public Law 98-550).

This public law states in Title II, the Congress has made its own review and examination of the National Forest Roadless Areas in Wyoming and the environmental impacts associated with alternative allocation of such areas. (Association, Cody, WY - #A26503.20206)

#### **440. Public Concern: The Forest Service should not consider environmental, social, and economic values when evaluating roadless areas.**

The Forest Service should not consider environmental values and social and economic considerations. It would only use them to reduce the area, to road it, or to log it. (Individual, Salem, OR - #A13948.45100)

Social and economic issues need not be considered for management of all portions of National Forest Lands. A significant portion of these lands should be maintained in a pristine state for preservation of existing ecosystems and support of alternative uses. (Individual, Seldovia, AK - #A23513.45000)

#### **441. Public Concern: The Forest Service should not evaluate roadless areas separate from its regular, on-going natural resource inventories and assessments.**

##### **UNTIL THE FOREST SERVICE PROPOSES AN ACTION THAT MAY AFFECT ROADLESS AREAS**

The Forest Service should not evaluate roadless areas separate from its regular, on-going natural resource inventories and assessments. The time to consider the unique characteristics of a roadless area in decision-making is when the Forest Service proposes an action that may affect a roadless area. Until that time, any evaluation of roadless areas is purely academic and of no utility to land managers or the public. (Union, Eugene, OR - #A6245.45100)

### *Adequacy of Analysis*

#### **442. Public Concern: The Forest Service should define roadless values in a context consistent with other aspects of land and resource management plans.**

The same criteria that are considered in other aspects of a land and resource management plan should be considered in the evaluation of inventoried roadless areas (i.e. watershed condition, wildlife, recreation, etc.). Additionally, “roadless values” must be defined in a context which is consistent with other aspects of the land and resource management plan. (County Department, Emery County, UT - #A30434.45100)

#### **443. Public Concern: The Forest Service should recognize that the Advance Notice of Proposed Rulemaking misrepresents the value of roadless areas.**

The ANPR implies that local decision-making is needed because protection is warranted for some roadless areas but not others yet never substantiates this. It states that most roadless areas previously were not recommended for wilderness designation due to low wilderness values or inadequate public support, and “other resource potentials.” This is a deliberately misleading representation of the inherent value of roadless areas (of which there is a huge body of literature left uncited by the ANPR) regardless of their wilderness potential. While evoking roadless resource potentials, the ANPR fails to provide a balanced recital of the ecological services provided by roadless areas. Instead, it observes that the

resource values of roadless areas “vary in importance,” specifically pointing out that roadless areas contain 9 million acres of “productive timberland.” (Organization, Aspen, CO - #A29614.11100)

**444. Public Concern: The Forest Service should assign value to actual scientific measured valuation, not “perceived” value.**

**BECAUSE YOU CAN'T PLACE A MONETARY VALUE ON ETHEREAL ITEMS**

I feel that a trend started in this area in the last few years attempt to place monetary value to ethereal items. The DEIS and FEIS both did this and attempted to show values for items that in reality are subjective. Value should be assigned on actual scientific measured valuation, not “perceived” value. Perceived value should carry some weight, however it should not outweigh hard physical values. (Organization, Huntsville, AL - #A13542.45000)

**445. Public Concern: The Forest Service should define social value and ecological value.**

The terms “social value” and “ecological values” need to be fully defined. Such terms are potentially explosive if they are subject to undefined individual interpretation and should not be used to make decisions on how to manage our National Forests. (Organization, Naperville, IL - #A20342.20202)

## **Adequacy of Maps and Inventories**

### **Summary**

**Maps** – In connection with the general evaluation of roadless areas, a number of respondents question the accuracy of maps and inventories. Several comment on the distribution of Forest Service maps. Others urge the Forest Service to provide and distribute more accurate maps; although some state that adequate maps were distributed. Many comment on mapping inadequacies, including the mapping of roads. A number of citizens offer suggestions for roadless area boundary adjustments. An organization and elected official urge the Forest Service to follow the guidelines required by 40 Code of Federal Regulations 1502.8 for document mapping in the use of plain language and appropriate graphics. One individual suggests roadless areas should not be delineated on a map because once these lands are designated it will be difficult to use those resources if they are needed in the future.

Additionally, numerous respondents question the accuracy of the maps used in the roadless area designation process. Many state that the maps were inaccurate. Many assert that specific roadless areas omitted from maps should be included and that the maps should be updated. Others request that roads be mapped accurately. Some people offer suggestions for improving the mapping process such as correcting past inaccuracies, ensuring maps are consistent with forest plans, and using Geographic Information System (GIS) technology.

**Inventories** – Roadless area inventories are a topic of comment to a number of respondents. They request the Forest Service complete or update the inventories in roadless areas. This includes inventorying infrastructure, developments, roads, and biological features and conditions. Others suggest areas they say should or should not be included after the inventories take place. Several ask that areas with roads be excluded from inventories; however, some suggest the opposite.

Many who comment about the accuracy of roadless area inventories state that these inventories are presently inaccurate and should be updated. Suggestions for updating inventories range from using uniform criteria to including other groups in the inventorying process.

## Maps General

### 446. Public Concern: The Forest Service should provide adequate maps.

The boundaries do not meet the test of a legal boundary in that they do not give any distances and directions from known land features or survey points. And finally they are generally not readily available to the public. A version at too large a scale to specifically determine whether an existing road is in or out of the roadless area is the only version generally available to the public. Detailed small scale maps are available only at Forest Service headquarters (with the exception of a limited number of forests that have put their GIS information on the internet). (Individual, Gold Bar, WA - #A28501.14120)

#### TO FOSTER INFORMED DECISIONMAKING

My husband and I are trail motorcyclists. We know many of the forests in Region One well, yet, none of the open houses or hearings we attended, nor any of the literature we could seek out either via the internet or in person, could even provide a single map at less than a very gross scale so we could determine how our interests might be affected. I know many people who did not comment at the time, and still can't because we never have seen site-specific information. (Individual, Bozeman, MT - #A19102.10135)

Roadless areas must be accurately mapped at the forest level, including an inventory of classified roads, in order that informed decisions can be made. (Elected Official, State of New Hampshire - #A18105.10135)

The Forest Service must analyze potential impacts on communities and private property and must give these national forest neighbors meaningful opportunities to comment on decisions about roadless areas and the wildland/urban interface that might place them at increased risk. Therefore, it will be essential that the Forest Service produce accurate maps of the location of communities and private lands within and adjacent to high-risk roadless areas and the interface. We note that the GIS database for the roadless areas did not have a complete inventory of private and state lands, so the public did not have an adequate opportunity to assess the proposed decision. (Association, Fernandina Beach, FL - #A15466.14500)

### 447. Public Concern: The Forest Service should distribute copies of the detailed maps of inventoried roadless areas that are currently on file in the Washington Office.

#### SEND MAPS TO REGIONAL OFFICES AND EACH NATIONAL FOREST FOR CITIZEN REVIEW AND BOUNDARY ADJUSTMENTS

Some opponents of the Roadless Rule complain that roadless areas are not sufficiently delineated on maps or otherwise described, so that the public does not know what exactly is protected under the Roadless Rule. The maps may not be perfect, but Colorado Wild believes they sufficiently describe the inventoried roadless areas.

Some updating and adjusting of boundaries may need to be done. The Forest Service should make this a priority in forest plan revisions and as part of each national forest's program of work. Also, copies of the appropriate detailed maps of inventoried roadless areas now in the Washington Office should be sent to at least every Regional office, and preferably also to each national forest containing roadless areas. That way, citizens could view maps of roadless areas in their state, national forest, or surrounding area. (Organization, Denver, CO - #A12008.10155)

### 448. Public Concern: The Forest Service should acknowledge that adequate maps were made available to the public.

It is disingenuous for the states, particularly Idaho, to claim that they were shut out of the decision making process because maps of the roadless area were not available to them. Maps of these areas have been available since the forest plans were signed in the mid to late 1980s. In addition, the EIS team did a tremendous job of making maps available by state and forest to the public and anyone else. If the final

decision had involved uninventoried roadless areas as well as inventoried roadless areas this would not have been true. (Individual, Grangeville, ID - #A798.10155)

In the past, during RARE I, RARE II, and the first round of forest planning, roads and logging were the principle issues in contention. This is no longer true. The most contentious decisions today are how to allocate unclassified roadless lands among fiercely competing, often incompatible, recreation interests.

Secretary Veneman's first "principle" implies that "accurate mapping" of roadless lands does not exist. Not true. Inventoried roadless lands have been mapped and catalogued for the past sixteen years in every Montana forest plan. They were posted at each roadless hearing and available on the web as well.

While mapping can always be fine-tuned with new technology, the fact is that the long-standing inventory was prepared at the local forest level, incorporating "local expertise and experience." Veneman is simply repeating another "common allegation" without factual merit. (Organization, Helena, MT- #A21370.45440)

#### **449. Public Concern: The Forest Service should recognize the inadequacy of maps in the Roadless Area Conservation Rule Final EIS.**

A key component of the Final Environmental Impact Statement (FEIS) is that portion of Volume 2 containing the maps. There existed confusion and misinformation pertaining to the maps that were part of the DEIS and remained in the FEIS, such that the public is not fully informed regarding the nature, extent, and scope of the Roadless Initiative, especially as it pertains to affected areas within the INF, including SSA. Unless and until there are specific delineated, detailed, and discernable maps attached to and made a part of a revised or supplemented circulated DEIS, the public will never have the appropriate and ample opportunity to analyze the decision documentation and comment thereon.

Even after issuance and circulation of the DEIS, maps were continuously being modified, newly published, and circulated. The mere effect of such an occurrence compels amending or supplementing the FEIS, recirculating it, and giving the public ample and appropriate opportunity to review and comment in accordance with NEPA and its implementing regulations. In the FEIS, the Forest Service never cured the deficiencies of the maps. (Business, Mammoth Lakes, CA - #A30296.14100)

#### **450. Public Concern: The Forest Service should adjust roadless area boundary lines where needed.**

Despite the burn in substantial portions of French Creek and Patrick Butte Roadless areas they deserve full protection of their timber, wildlife, and non-motorized resources. The Elkhorn Creek areas, which was recently cut, should be closed to the roaded area so as to keep wildlife migration viable. The Elkhorn Creek area is still hard to gain access to and should not be made easier. Lake and Partridge Creeks are the most pristine drainages aside from French creek, and all three should remain roadless in perpetuity. The boundary should be extended to include the BLM property to the Salmon River. Hazard creek and Hard Creek should be protected for anadromous fish and thus should not be logged along their length or be roaded. Their headwaters should also be protected where they are above the anadromous habitat. Granite Mountain, at the south end of Patrick Butte, is threatened by a ski area and further random skiing but should remain roadless at least through the next planning period. The boundary of the roadless area is adequate up past Grassey Lakes and by Scribner Lake, Lave Butte, and Hershey Point. Beyond that point the boundary in the hydrogeologic boundary of Partridge Creek.

In the French Creek drainage the roadless areas boundaries should follow Little French Creek as close as possible, skirting clearcuts and the road down to include the BLM property. From there the boundary following the French Creek road up to Burgdorf property. From there the boundary following the French Creek road on up to Burgdorf then to Nethger and Josephine lakes and Cloochman Saddle, following the paved road to near Copet Creek, missing Granite Reservoir and Fisher Creek Saddle then dipping south again to past Slab Butte and following along Brundage Mountain Road to near Hard Creek Lake and Upper hazard Lake and back to Little French Creek. The clearcuts along Little French and French Creeks should be managed to favor habitat management. The utmost concern should be taken to include the hydrogeologic boundary of French Creek, especially along Klip Creek, where no timber management should be undertaken. The Slab Butte, Bruin Mountain, and Little French Creek country

should not be managed for recreation, timber, or sheep, but rather for their plants and alpine habitat; it is fragile and in some cases burned. The management of wolves is problematic in this area; the wolves should not be relocated when they occur. (Individual, Boise, ID - #A21369.45624)

#### **TO FACILITATE THE ECONOMICAL MANAGEMENT OF ROADLESS AREAS AND ADJACENT LANDS**

The Forest Service should allow local forest-level decisions for forest health treatments, including timber removal to reduce the risks of wildfire, where such activities will not impair roadless values. Boundary lines should be adjusted where needed to facilitate economical management of the roadless area and adjacent lands. Mid-slope boundaries are expensive to locate and create impossible boundaries for prescribed burning and other management projects. (Professional Society, Missoula, MT - #A15793.30100)

The allocation process should provide for the adjusting the boundaries of the IRAs either smaller or larger to facilitate more logical, efficient, effective boundaries. (Individual, Missoula, MT - #A28297.30120)

#### **TO MANAGE AREAS THAT MAY HAVE BEEN ROADED AFTER RARE II**

The Forest Service should provide a process by which consideration could be given for the boundary of the Roadless Area to be modified to meet current conditions. In this instance, the boundary (which is derived from the 1979 RARE II Final Environmental Impact Statement) includes lands that are roaded and have been managed as such for many years. (Elected Official, Gunnison County, CO - #A22061.45100)

#### **TO SERVE ALL NEEDS**

Severability. The boundary of an IRA can be adjusted sometimes to serve both sides' needs. For example: a 30,000 acre IRA has an intact portion or "lobe" containing 5,000 acres of productive timberland. This productive portion could be "severed off," if needed, and allocated to the adjacent development. The remaining 25,000 acres could be protected for its roadless values. (Individual, Libby, MT - #A2301.45300)

#### **BY USING RELEVANT AND CREDIBLE INFORMATION**

Use all relevant and credible information on which to base the boundary of the Roadless Area—not just taking the 1979 RARE II boundary and considering it done. While the comments are relatively extensive for the West Elk Mine in Colorado, they are not for mines located on Forest Service lands located in Utah. Input on these operations should also be developed and considered. (Business, Wright, WY - #A23085.45400)

#### **BASED ON HISTORIC FACTORS INCLUDING OPERATING PRACTICES AND LAND MANAGEMENT**

Create a mechanism whereby any proposed Roadless Area boundary can be modified and revised based upon historic factors including operating practices and land management. (Business, Wright, WY - #A23085.45400)

Today, there are two active coal mines operating in this area, justifying the need to adjust the Roadless Area boundary in this area. (Business, Wright, WY - #A23085.45440)

### **451. Public Concern: The Forest Service should not arbitrarily adjust roadless area boundaries to accommodate current or future uses.**

#### **IN THE INVENTORYING PROCESS**

Having witnessed the White River National Forest roadless areas inventory, serious flaws in the inventory process have become quite apparent. Roadless area boundaries have been arbitrarily and capriciously drawn to accommodate current or future uses, despite the absence of any system roads. We have seen roadless area boundaries in the WRNF inventory exclude lands containing no roads because the Forest Service has its eye on the timber contained therein. Particularly alarming is the practice of allowing non-system, illegally created roads to disqualify areas as roadless. Furthermore, the current roadless inventory process is not an end-in-itself but rather an intermediate step in the process of

nominating land to Congress for wilderness designation. This structure encourages Forest managers to inappropriately combine capability and suitability in the process of mapping roadless areas. We have seen roadless inventories with boundaries drawn to exclude mountain bike trails because this use would be non-conforming with a wilderness management. Mountain bike trails are not roads and the lands around them had no roads either, yet, they were drawn out of the boundary. The Roadless Area Inventory process must be uniform nationwide and must be conducted as an end itself, not as a step in the process of wilderness designation. (Organization, Aspen, CO - #A29614.45000)

**452. Public Concern: The Forest Service should make roadless area boundaries obvious.**

**TO PREVENT LITIGATION AND DISPUTES OVER DIFFERING INTERPRETATIONS**

The area affected by a road seem to have all kinds of definitions depending on which whine factor the various groups seem to want to use. If the area is wanted for Wilderness there is one set of influence standards and there is one for wildlife, the list continues, but yet another if you want to lock up an area. It would seem appropriate that in areas with any sort of clearly defined topographic watershed features, such as creeks or ridgelines, those roads, once present, influence that entire area. It also seems apparent that as a road proceeds through watershed drainage the progress of the road's influence ends somewhere at the next obvious watershed divide defined element. I make this point because obvious boundaries are a must if litigation and disputes over interpretations are to be avoided. The Forest Service already spends far too much time in legal disputes without adding more. That means that areas with numerous four-wheel drive undesignated roads throughout the drainage area should not be declared roadless simply because the current roads don't meet the Forest Service test for vehicle passage. Vehicles had influenced these areas and the major action should not be [to] displace the users of these areas unless the resource impacts are very significant. (Individual, Cambridge, ID - #A11714.45513)

Loud moneyed local interests with schemes for destructive use of our forests are difficult for local planners to resist. For this reason boundaries are needed on the local planning that is necessary to implement and tidy up the roadless rule. For example, if some scrap of roadless forest is too viable, require an internal land swap of uncut roaded forest in which the roads can be abandoned. If the spirit of the roadless rule is maintained it is possible to be a little flexible about the details. (Individual, Pasadena, MD - #A17237.13210)

**453. Public Concern: The Forest Service should follow the guidelines required by 40 Code of Federal Regulations 1502.8 for document mapping.**

**IN THE USE OF PLAIN LANGUAGE AND APPROPRIATE GRAPHICS**

The maps used in the environmental document must be familiar and easily interpreted by the public. The public is most familiar with the Forest Visitors Map. The environmental document mapping must follow the guidelines required by 40 CFR 1502.8 which states that "Environmental impact statements shall be written in plain language and may use appropriate graphics so that decision-makers and the public can readily understand them". The maps must identify streams, road numbers, trail numbers, landmarks and key topographic features so that the public can easily interpret them. (Organization, Helena, MT - #A13226.10135)

In addition, the maps were at an insufficient scale to accurately assess the impacts of the proposed rule - additional maps and definitions contained in local forest plans had to be consulted. We highlighted that the Code of Federal Regulation (40 CFR 1502.8) direct that decision makers can readily understand them." We request that the maps and definitions be expanded and clarified. Upcoming local forest plans updates would provide an appropriate forum for clarifying local roadless rule applications and associated maps. (Elected Official, Mono, CA - #A18107.14100)

**454. Public Concern: The Forest Service should not delineate roadless areas on a map.**

**BECAUSE ONCE THESE LANDS ARE DESIGNATED, IT WILL BE DIFFICULT TO USE RESOURCES THAT MAY BE NEEDED IN THE FUTURE**

My recommendation for these so-called "roadless" lands:

Simply maintain the status quo; do not put a line on the map. There will come a day when the political pendulum will swing. There will come a day when we no longer depend on other countries to meet our needs. There will come a day when other countries will no longer allow us to treat them as mere colonies. Once lines are drawn on a map, options will have been taken away. It will be extremely difficult to erase those lines when we someday need to use those lands. (Individual, No Address - #A25635.45000)

**455. Public Concern: The Forest Service should adequately mark roads on maps and on the ground.**

We are concerned to know if the roads, once they are inventoried, will be properly marked on maps? Will the maps be readily available and circulated in the marketplace? Finally, will the roadways/trails have any type of marking designation on the ground? How can volunteers and other groups assist the forest Service in marking and maintaining these roadways/trails throughout the forests? We believe that once a proper inventory is done, that the inventory needs to be documented, properly annotated and updated on ALL maps throughout the forests. Roads and trails; once inventoried and designated, must be marked and signed. (Business, Haslett, MI - #AA4861.14000)

*Accuracy of Maps*

**456. Public Concern: The Forest Service should accurately map roadless areas.**

**TO ACCURATELY IDENTIFY ROADLESS AREAS**

Imposing a one-size-fits-all regulation on roadless area management will inhibit the Forest Service's ability to participate in landscape restoration and risk-reduction efforts on our National Forests. To more effectively comment on how the roadless policy affects the State of Colorado, we request detailed maps from the U.S. Forest Service as to what is, and what is not, considered roadless by the agency. Once received, we will prepare more detailed comments. Clearly, there are many areas in Colorado that are roadless and deserving of such protection. Without clear maps the Forest Service cannot possibly identify them. With adequate maps, Colorado could help. (State Agency, Denver, CO - #A2332.14140)

**TO ENSURE THAT ELIMINATION OF FUTURE ROADS DOES NOT PUT FEDERAL AND PRIVATE TIMBER RESOURCES AT RISK**

Roadless areas should be mapped to assure that elimination of future roads is not putting federal and private timberlands at risk from uncontrollable wildfires, disease and insect infestation. (Elected Official, Plumas County, CA - #A4846.45000)

**TO ENSURE ADEQUATE ASSESSMENT OF THE PRESENT AND FUTURE IMPACTS OF ROADLESS AREAS**

In the past, the Forest Service has argued that those forests with plans in the final stages of the revision process should also be exempted from the roadless area policy. But upon closer analysis of forest plans, it is clear the revision process has not proven adequate in assessing either the present problems or future impacts of roadless areas. Under ideal circumstances, a National Forest would conduct an on-the-ground inventory of roadless areas and evaluate any potential impacts of proposed management activities within or adjacent to these pristine areas. However, many of these reassessments have been sloppy and inadequate. Cases in point:

The Targhee National Forest is adjacent to Yellowstone National Park and encompasses one of the most scenic and ecologically important areas in Idaho. In the required analysis of roadless areas, the Targhee National Forest simply photocopied old inventories, made marginal notes, and added just five pages of update to an inventory over a decade old. In addition, the forest plan revision failed to link the

importance of roadless areas with aquatic species such as the imperiled Yellowstone cutthroat trout. As a result, hundreds of thousands of acres of roadless lands will now be open to development based on an analysis completed almost fifteen years ago. Experience in the Targhee and other forests indicate that attempts at planning to protect roadless areas have failed.

Boulder Mountain on the Dixie National Forest in Utah is a 150,000+ acres uninventoried roadless area. Areas adjacent to Boulder Mountain comprise 60,000-80,000 acres of roadless lands that were not included in the Dixie inventory. All these areas should receive immediate protection and should not have to wait for the forest planning process.

In a 1999 citizens' inventory of the Manti-La Sal National Forest in Utah, 30 percent more roadless areas were found in the La Sal Mountains and 50 percent more were found in the Abajos than what is currently in the Forest Service's inventories. In a 1998 citizens' inventory of the Uinta National Forest 123,500 more acres of roadless lands were found than the Uinta's own 1999 inventory. These areas also deserve immediate protection.

Fishlake National Forest's Strategic Communication Director Linda Jackson, recently confirmed that the inventories from Utah's four National Forests not going through the revision process (Fishlake, Ashley, Dixie, and Manti-LaSal) are seriously flawed. Utah's National Forests are relying on roadless area inventories from 1979. More reliable inventories were conducted in 1983 but never completed due to the passage of the Utah wilderness bill. The timing was not coincidental. Utah's congressional delegation purposefully halted these inventories. (Organization, Nevada City, CA - #A4941.45400)

#### **TO ENSURE THAT MANAGEMENT OPTIONS CAN BE ACCURATELY ASSESSED**

It is absolutely essential that accurate maps of roadless areas and areas at risk of insects, disease and wildfires be completed so that management options can be properly assessed. (Individual, Irvine, CA - #A15580.30100)

#### **AS PART OF THE PUBLIC INVOLVEMENT PROGRAM FOR FOREST PLANNING**

The Forest Service needs to provide accurate, up-to-date maps of inventoried roadless areas as part of the public involvement program for forest planning. (Permit Holder, McCall, ID - #A15317.14100)

#### **BY GROUND VALIDATION**

National direction on the criteria for delineation of roadless areas must be provided to the field. This criteria should include standards for mapping classified and unclassified roads, mapping of forest health, fire and insect/disease risks, wildlife habitat, water quality, scenic values, access needs, recreational opportunities, timber values, wilderness attributes, etc. Using the above information, national forest should be remapped to accurately reflect their roadless areas with all mapping being ground validated. (Association, Colville, WA - #A3091.10135)

#### **INVENTORY AND MAP THE GEOGRAPHIC LOCATION OF ROADLESS AREAS IN RELATION TO THE OTHER SIMILAR AND DISSIMILAR AREAS AND ANY CULTURAL DEVELOPMENT**

The geographic location in relation to the other similar and dissimilar areas and any cultural development must be inventoried and mapped. (Individual, Evergreen, CO - #A19178.45330)

#### **MAP CLASSIFIED, UNCLASSIFIED, AND OBLITERATED ROADS IN AREAS THAT QUALIFY AS ROADLESS**

Each National Forest's Plan must, as a part of its next scheduled revision, include assessments that would "qualify" or "disqualify" each inventoried roadless area for such status. Those qualifying inventoried roadless areas would then be explicitly depicted on maps. Strict attention must be paid to road classifications in and around roadless areas by means of lists and maps of classified, unclassified and old obliterated roads. Based on local citizen input, establish a spectrum of active forest management methods and protection/preservation guidelines and, when applicable, assign them to each "qualifying" inventoried roadless area. (Organization, Moscow, ID - #A15318.45500)

#### **INVENTORY AND MAP CLASSIFIED ROADS FOR THE COLVILLE, OKANOGAN, AND IDAHO PANHANDLE NATIONAL FORESTS**

We would like to see the schedule to complete the inventory and mapping of classified roads for the Colville, Okanogan, and Idaho Panhandle National Forests. (Business, Colville, WA - #A2593.12400)

**457. Public Concern: The Forest Service should use updated maps.**

The Forest Service must first define up-to-date criteria for the delineation of roadless areas and not use maps that are outdated. The maps should be updated with current data as land management plans are revised. (Association, Ketchikan, AK - #A20443.13212)

**TO GIVE THE PROPOSAL CREDIBILITY AND TO ALLOW THE PUBLIC TO MAKE SPECIFIC COMMENTS**

KARE believes the areas within this proposal include many that are roaded, and in which the road access is being used for many multiple use activities. By changing the definition of a road, the Forest Service proposal identified many roaded areas as unroaded. The RARE II inventories are more than 20 years old, and many NFs have updated maps that clearly indicate new roads. By failing to use updated maps, the entire proposal lacks credibility, and prevents the public from being able to make specific comments. (Organization, Yreka, CA - #A8381.45400)

**458. Public Concern: The Forest Service should correct mapping errors.****TO INCLUDE ELIGIBLE ROADLESS AREAS**

As for any Forest Service mapping errors that resulted in leaving 1.5 million, currently roadless acres open to clear-cut logging and road building in the January 2001 roadless rule we suggest that these mapping areas be fixed if they have not already been fixed in order to provide protection for Neka Mountain near Hoonah as well as Little Seal Creek, Saltery Bay and Crab Bay in Tenakee Inlet and other affected areas.

These areas are traditional territories of the Huna Tlingit. Their use of these lands can be traced back thousands of years. They continue to rely on the resources of the land and sea for their subsistence and survival. What is happening on the part of the Bush Administration, The National Forest Service, and for the for-profit Corporations is shameful. We must have protection for roadless watersheds on the Tongass. Keep the Tongass in the roadless rule. (Director Tribal Resources, Hoonah, AK - #A3024.45623)

Forest Service mapping errors failed to include eligible roadless areas such as: Broad Finger, Broad Creel, Saook Bay, Poison Bay, Deep Bay, and Ushk Bay; and a recent court decision removed protections of important community use areas provided by the 1999 Tongass Land Management Plan, thereby increasing the importance of the Roadless Policy on the Tongass, with mapping error corrections. (Elected Official, Tenakee Springs, AK - #A3358.45623)

As a result of a FS mapping error, the January 2001 roadless rule mistakenly left open 1.5 million currently roadless acres to clearcut logging and road building -- areas traditionally used by local communities. The FS should fix these mapping errors and provide long term protection for Neka Mountain near Hoonah; Little Seal Creek, Saltery Bay and Crab Bay in Tenakee Inlet; Broad Finger, Broad Creek and Saook Bay in Peril Strait; Poison Cove, Deep Bay, and Ushk Bay near Sitka; and East Kuiu Island, including Reid, Alvin and No Name Bays, and Seclusion Harbor. (Individual, Worthington, MA - #A10381.45621)

The reason Texas National Forests do not have many Roadless Areas is due to excessive road construction, including phantom roads and fire lanes, and an unfair Revised Land and Resource Management Plan (RLRMP) in 1996 which used tactics that kept potential Wilderness Areas (RARE II) from being considered.

For instance, fewer roads were shown on the maps in the RLRMP for Roadless Areas than in the maps handed out at the June 2000 informational meetings. The impacts of all FS roads were supposed to be considered in the RLRMP. Apparently, someone miscounted the number of roads. The roads shown on the maps handed out at the June 2000 informational meetings were found to be overgrown and barely discernable in the Big Creek Scenic Area, one of the Roadless Areas designated in Sam Houston National Forest. These so-called roads reduced the acreage of Roadless Area in the Big Creek Scenic Area Roadless Area. (Organization, Bellaire, TX - #A883.10155)

**TO CORRECT AREAS ON THE TONGASS NATIONAL FOREST SHOWN AS “APPROVED FOR DEVELOPMENT”**

Accurately map roadless areas on the Tongass: Include those areas such as Poison Cove and Ushk Bay that on current roadless area GIS plots are shown as “approved for development.” They are not. Review all court decisions concerning individual sales on the Tongass made since the date of the first Roadless Rule and include those areas where logging has been enjoined or prohibited. (Individual, Tenakee Springs, AR - #A1758.45623)

**TO INCLUDE ADDITIONAL TERRITORY THE INVENTORIES EXCLUDED**

The first principle for protection and management of roadless values stated by the Secretary of Agriculture on May 4, 2001 says that decision making should be based on “reliable mapping” and “local expertise and experience”. The New Mexico Wilderness Alliance has recently performed new mapping of roadless areas and found much more territory than the inventories include. These areas should be added to the inventory in order to abide by the Secretary’s principles. Also, some of the inventoried roadless areas now contain roads. (Individual, Albuquerque, NM - #A4864.45440)

Identify roadless areas omitted from Forest Service inventories. (Individual, Paluose, WA - #A6756.45400)

**CORRECT THE MAP OF THE SANTA ROSA RANGER DISTRICT THAT SHOWS THE DISTRICT AS ROADLESS**

I live in Humboldt County, Nevada, and I am concerned about the Santa Rosa Ranger District map showing the district being virtually roadless. (Individual, No Address - #A29078.45621)

**IDENTIFY THE TRAIL IN THE THREE PRONG AREA THAT ENTERS THE MEADOW CREEK ROADLESS AREA ON THE NEZ PERCE NATIONAL FOREST AS A TRAIL RATHER THAN A ROAD**

The Nez Perce National Forest map available at the hearings and open houses shows a road in the Three Prong area that enters the Meadow Creek roadless area although none appears on the map we received from the Nez Perce Forest showing recent development. This route was previously not considered a road for purposes of the roadless inventory (either RARE II or the Forest Plan) as it was (is) permanently closed, the area is revegetating, and it is not a significant impact or maintained (used for “experimental” purposes?). This, it should not be considered as a road even though it has been assigned a number. It should more appropriately be listed as a trail. (Organization, Moscow, ID - #A22654.45524)

**459. Public Concern: The Forest Service should consider that past inaccuracies in determining roadless area boundaries may cause problems in the future.**

Let me start with #A10: and more specifically with the issue of roadless area boundaries. The current boundaries were derived from a process designed to inventory roadless areas and determine approximate areas involved. They were never intended to become legal boundaries. The boundaries are highly inaccurate (Individual, Gold Bar, WA - #A28501.10135)

**BECAUSE MAPPING ERRORS MAY PROHIBIT IMPROVEMENTS TO AREAS THAT SHOULD NOT HAVE BEEN INCLUDED IN A ROADLESS DESIGNATION IN THE FIRST PLACE**

These inaccurate boundaries have the potential to create problems in the future when usage dictates an improvement to an existing road that was not intended to be in a roadless area but was partially included due to mapping errors. My original comments noted a portion of US 12 in a roadless area. Rather than correct the boundary, the Forest Service added some additional language mitigating the problem with US highways. That begs the question of why it is in the roadless area to begin with and does nothing to resolve the problem with FS roads that are inadvertently in the roadless area. (Individual, Gold Bar, WA - #A28501.10135)

**460. Public Concern: The Forest Service should coordinate with adjoining Bureau of Land Management lands when making maps.**

There needs to be better coordination between adjoining National Forest and BLM lands when making maps, laying out trails, and establishing travel plans. Many times a trail is open in one jurisdiction but

becomes closed when crossing over the boundary to another jurisdiction resulting in an overall loss of motorized recreation opportunity. (Organization, Helena, MT - #A13226.15162)

**461. Public Concern: The Forest Service should ensure that Forest Visitors Maps are consistent with the Forest Travel Plan.**

**TO DECREASE VISITOR CONFUSION**

Conflict of uses is aggravated by Forest Visitors Maps that are not consistent with the Forest Travel Plan. All forest visitors need to clearly understand what areas, roads or trails are open for motorized travel and what areas, roads, or trails are closed to motorized travel. We have experienced a number of misunderstandings from both non-motorized and motorized visitors. The Travel Plan Map and Forest Visitors Map should be the same. Also, this combination map should include additional detail such as contour information so that the public can better determine the location of roads and trails that are open or closed. (Organization, Helena, MT - #A13226.15163)

**462. Public Concern: The Forest Service should use Geographic Information System technology to document and map the location of uninventoried roadless areas larger than 1,000 acres.**

GIS maps generated by conservationists document location of uninventoried roadless areas larger than 1,000 acres. They have been provided to the Forest Service. The agency has the same technology and, with the push of a button, could also generate such maps. (Organization, Moscow, ID - #A22654.45320)

**463. Public Concern: The Forest Service should consider that forests have not been accurately described or represented to the public.**

**OLD GROWTH AND SECOND GROWTH HAVE NOT BEEN ACCURATELY DESCRIBED**

The amount of second growth on National Forests including pre-Forest Service logging and fire events is generally under reported. There are much larger areas of logged over forests that are not represented as timber areas in Forest Planning Revisions. In mapping these areas are not represented as areas that have been already been altered a great deal by man. In reality, these areas do not possess many of the attributes that are so valuable in older mature forests, such as many dead snags per acre, and larger amounts of carbon sequestered in dead woody material. For example, on my districts on the White River NF, the designated timber areas in the new forest plan revision are only a few thousand acres. However, the areas that have been actively logged since the turn of the century and do not contain old growth forest attributes because of the past logging number in the tens of thousands of acres. Therefore, if someone looks at the forest plan revision map for 2001 one may conclude that the timber operations on the forest are a very small percentage of the Forest operations as a whole. However, if one looks at the total amount of logging and road building that has occurred and still has a cumulative ecological effect on the watersheds, the percentage would be much, much higher. Roadless designation is acting to protect many areas that still possess these older forest attributes and are allowing some areas to continue to acquire those attributes. (Individual, Penrose, CO - #A21448.45500)

It is quite clear by the comments supporting the maintenance of these areas in their "pristine roadless condition" that most of the people commenting have never seen the areas covered under this plan. If they had, they would know that these areas have been logged, mined and in some cases have roads, still in use, predating the formation of the Forest Service. . . . Over 30% of the Payette National Forest has burned over the past 10 years. Trees will not begin growing in much of the areas for 50 to 100 years because of the intensity of the fires. Almost none of these areas have had any trees planted following the fires. There is no plan to plant these areas because they are steep, have few roads and the Payette National Forest doesn't have the funds to plant new trees. They remain at high risk for repeat fires in the current condition. A second burn in these areas will further sterilize these soils so that trees may not grow for an even longer period of time.

The Roadless Area Initiative has been one of the biggest hoaxes carried off by the Clinton administration. By labeling these areas “roadless” and “pristine”, support has been gathered from people who have not and will never see these areas. Many of these areas do not have the types of “old growth” that the public is being lead to believe they support. (Individual, McCall, ID - #A29305.45100)

#### **TRAVELWAYS HAVE NOT BEEN ACCURATELY DESCRIBED**

The current data being collected by the evaluation team does not fully show the roaded nature of these areas as it does not include the many well established and utilized motorized travel ways.

In addition Non-FS Federal along with State and County Roads are not included in the Forest Service classified road system, so much of the areas considered as roadless now and in the future local Forests and communities will have to go through extensive studies to eliminate obviously roaded areas set aside by mindless beltway bureaucrats and politicians who don't have a clue of what conditions occur on the ground. (Individual, Alturas, CA - #A28581.10135)

### *Inventories General*

#### **464. Public Concern: The Forest Service should inventory certain features in roadless areas.**

##### **INVENTORY AND EVALUATE ALL NATURAL RESOURCES AND THEIR POTENTIAL VALUE, INCLUDING EXTRACTIVE MINERALS**

Describing Values: In evaluating and inventorying “roadless” areas the USFS must inventory and evaluate ALL natural resources and their potential value, including extractive minerals. Our nation is rapidly running out of the strategic mineral resources vital to sustaining our society. The U.S. is becoming more dependent on foreign suppliers of these critical mineral resources. The USFS must evaluate the real cost to society of closing off potential mineral areas with “roadless” designations. (Individual, Tucson, AZ - #A5625.45000)

##### **INVENTORY ALL INFRASTRUCTURE AND DEVELOPMENTS**

Require an inventory of all developments including: roads, routes, travelways, trails, cabins, or other human caused development or disturbance.

In order to make informed planning decisions on the future management of roadless areas, it is essential that all information be available to the decision makers. For this reason, it is essential that all evidence of human use or development should be identified and mapped. This proposal would require that a complete inventory be conducted before a management plan is developed. (Organization, Salt Lake City, UT - #A12009.45400)

##### **INVENTORY AND GROUND VALIDATE EACH ROAD AND TRAIL TO DETERMINE ITS RECREATIONAL VALUE AND ANY PROBLEMS REQUIRING MITIGATION**

Each road and trail should be inventoried and viewed on the ground to determine its recreational value and any significant problem areas that require mitigation measures. Each road and trail should be evaluated for its value as a motorized loop or connected route. Each road and trail should be evaluated for its value as a dispersed campsite or as access for all multiple-use visitors. Every problem has a solution. Every impact has a mitigation measure. Roadless Rule alternatives should be developed with the objective of including as many roads and trails as possible and addressing as many problems as possible by using every mitigation measure possible. (Organization, Helena, MT - #A13226.45400)

##### **INVENTORY TOPOGRAPHIC AND PHYSICAL CHARACTERISTICS**

What are the characteristics of the land to be considered? All the topographic, and other physical characteristics. The existing and potential flora and fauna must be inventoried and mapped, the geographic location in relation to the other similar and dissimilar areas and any cultural developments must be inventoried and accurately mapped and described, the size of the area is very important. (Individual, Manhattan, MT - #A21848.45100)

The roadless areas identified by the final rule cover 58.5 million acres. This large expanse of area covers broad ranges of ecosystems and forest types. Each individual unit of forest needs to be fully examined and analyzed to gain a complete understanding of the characteristics that define that forest. Specific characteristics include: tree types, other vegetative cover, wildlife present, soils, hydrology, topography, and climate. However, other characteristics not related to the environment should be considered also. These include the specific uses of the forest, the users, and how the land and resource management plan addresses those concerns now.

Specific environmental values to be considered are the value of the ecosystem for wildlife protection, recreation, aesthetics, watershed protection, and overall health of the ecosystem. Each individual unit of forest has different environmental values that should be taken into consideration when making individual decisions about that specific forest and how it should be managed. (Association, Washington, DC - #A28689.45000)

#### **INVENTORY FOREST HEALTH CONDITIONS**

Prior planning for immediate access into inventoried roadless areas is imperative. Additionally, the current status of Forest conditions must be inventoried and mapped, e.g., dense stands in need of thinning; areas of heavy fuel build-up and in need of controlled burning. (Individual, Fort Collins, CO - #A17987.30410)

#### **INVENTORY VALUES, SOCIAL AND ECONOMIC IMPACTS, AND LONG-TERM USES**

Delineation: Before any decisions can be made one must know what your decision is about. Any areas proposed for roadless designation must first be delineated on maps and then inventoried for the values they have, what social and economic impacts they may affect, and determine what is best in the long term for the land. Has this process been done for any, all, or some of the lands involved in the roadless rule? (Association, Columbia Falls, MT - #A18043.45100)

#### **INVENTORY ROADLESS AREAS, ROADED AREAS, CLASSIFICATIONS OF ROADS, AND PRIVATE ACCESS ROADS**

Before any proposal goes forward, the agency must fully inventory roadless areas, roaded areas, classifications of roads and private access roads. Additionally, the inventory must be accurate down to the forest level so that decisionmakers and the public can be fully informed. Most importantly, the agency must consider the economic and social impacts when considering any final action. (Organization, No Address - #A29917.45400)

#### **465. Public Concern: The Forest Service should specify when the uninventoried roadless areas are to be inventoried and clarify that existing management will not change prior to completion of the inventory.**

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. (Elected Official, Douglas County, OR - #A11811.45420)

#### **466. Public Concern: The Forest Service should delete roaded portions of inventoried roadless areas from the inventory.**

Roaded portions of inventoried roadless areas should be deleted from the inventory. (Association, Conroe, TX - #A8076.45400)

If an area is currently or previously roaded, it should be dropped from the Roadless inventory. (Organization, Maryville, TN - #A8754.45400)

Roaded portions of inventoried roadless areas should be deleted from the inventory. If these areas are not removed, existing roads should be maintained to provide access for fire mitigation and fire fighting activities. (Elected Official, State of Minnesota - #A15541.45512)

**467. Public Concern: The Forest Service should include previously inventoried trails in the present inventory.**

Return trails that used to be on the Forest Service trail inventory to the present inventory. (Organization, Helena, MT - #A13226.45400)

**468. Public Concern: The Forest Service should clarify that the existence of user-created routes is not an appropriate reason for removing a roadless area from the inventory.**

Prohibit Illegally Created Unclassified Routes In Roadless Areas.

The final rule should make it clear that the existence of user-created and other unclassified routes are not an appropriate reason to remove a roadless area from the inventory. (Organization, Missoula, MT - #A21359.90420)

**469. Public Concern: The Forest Service should consider a road that has appeared on a forest map for more than ten years to be a road.**

**FOR THE PURPOSES OF DEFINING ROADLESS AREAS**

Fifty-two percent of the designated “Inventoried Roadless Areas that do not allow road construction or reconstruction” in the State of Colorado are within the Rio Grande National Forest. This seems to be disproportionate for a single National Forest. In addition, until the definition of “Roadless” is clarified, designating areas is difficult. Saguache County Commissioners contend that if a road has been shown on a Forest map for more than ten years, it is a road for the purposes of defining roadless areas. (Elected Official, Saguache County, CO - #A28774.45500)

**470. Public Concern: The Forest Service should clarify the present status of lands classified as inventoried roadless areas—roaded or unroaded—since RARE II.**

The resort I work at, Sierra-at-Tahoe Snowsport Resort, has on its western boundary an Inventoried Roadless Area. Even though it is listed as IRA where road construction and reconstruction is allowed, there is also a section of IRA where roads are not permitted. There is no question that our resort has influenced the improved access to this land and thus has changed the character of the land since it was reviewed under RARE II in 1979. To that end, we are very interested to find out if any reclassification of land is anticipated in the near future. To assume that the land and its qualities have not changed in over 20 years is not logically understood. We would respectfully like to have access to all review documents completed on all land adjacent to Sierra-at-Tahoe permit area that was placed in either IRA roaded or unroaded since the RARE II work was completed. (Business, Twin Bridges, CA - #A8808.45440)

In 25 years, the RARE II areas have obviously changed. But RARE II was not updated for the Roadless Initiative. Rather, the RARE II areas were used as they were originally defined.

To address the changes that have occurred in 25 years, the DEIS had to define very confusing terms like “roaded roadless areas”, “unroaded roaded areas” and “unroaded roadless areas”. To make matters more confusing, the DEIS Alternative 2 has that the next round of Forest Plans will look at all National Forest areas outside the RARE II areas to see if more are suitable for inclusion into IRAs under this proposal. Thus, there may be millions of acres included that aren’t on the map. The DEIS is asking the public to comment on impacts on land which does not have a defined boundary. And this is not an insignificant amount of land that may eventually be included—this may more than double the amount of land included in some States, particularly in the east. The DEIS does not even attempt to explain this or estimate the increased areas that will be impacted.

The DEIS addresses this serious flaw by simply saying that local managers will define these areas at the next round of the local Forest Plan. How can the public be asked to comment on impacts on the lands that have not even been defined or identified? (Union, No Address - #A28881.45000)

What are your intensions in regards to the lands, which have been roaded since the last survey?  
(Individual, Walla Walla, WA - #A17698.45400)

**471. Public Concern: The Forest Service should not change current inventory information.**

**BECAUSE IT WOULD BE A VIOLATION OF THE NATIONAL ENVIRONMENTAL POLICY ACT**

The areas depicted on the roadless FEIS volume II are accurate and complete. These areas were inventoried through a complete public involvement process conducted through each Forest Plan. You can not legally change these inventories without violating NEPA. (Individual, Salt Lake City, UT - #A26984.45400)

**472. Public Concern: The Forest Service should require forests to survey areas not included in the Roadless Area Conservation Rule.**

**THROUGH THE NATIONAL FOREST MANAGEMENT ACT PROCESS**

The NFMA process can fill in whatever details are left over, but it should not be used to countermand the national policy set forth in the rule. One area in which the NFMA process would be especially valuable, however, would be in surveying the lands ignored by this rule (such as roadless areas below 5,000 acres in size, and formerly roadless lands that have been degraded by logging) for the purpose of identifying areas to be added to the roadless inventory, or to be rehabilitated to roadless status. Local forests should be mandated to conduct such reviews, using the NFMA process. (Individual, Pendleton, OR - #A30482.20201)

**473. Public Concern: The Forest Service should identify all roadless areas created or enlarged by road closures.**

Under the NEPA regulations an agency can not commit resources prejudicing selection of alternatives or otherwise limiting the choice of alternatives before making a final decision. We note that the Forest Service has been closing and obliterating roads with the stated intent to create larger unroaded areas. To ensure that the agency allows for proper review and comment by the public, we suggest that all roadless areas created or enlarged by road closures be identified. (County Attorney, Grant County, OR - #A17667.45510)

**474. Public Concern: The Forest Service should state who did the roadless inventory, and explain the methodology and criteria used to determine whether an area is roadless.**

Who did the inventory, how, what methodology was used, what criteria was used to determine "roadless"??? (Individual, Tucson, AZ - #A5625.10135)

*Accuracy of Inventories*

**475. Public Concern: The Forest Service should update the roadless area inventory.**

**BY USING CURRENT INFORMATION**

Forest lands should be re-inventoried for roadless values. The inventory upon which the roadless rule was based is outdated. The last inventory of roadless areas—RARE II—was completed in 1979. Circumstances and conditions within those areas have changed. Any roadless policy should be based on sound science, which, in this case, requires that forest lands be reinventoried prior to its adoption. (Individual, Eagle, ID - #A17754.45400)

As a 37 year veteran of the Forest Service, I served as a district ranger during both Rare 1 and Rare 11. The inventory then was flawed. Its main purpose was to inventory for potential wilderness. The Endangered Species Act did not weigh into the evaluation at that time. We were asked to inventory large areas that met certain lack of roads criteria. The productivity of the forest in the inventoried areas was not put into the equation. (Individual, No Address - #A20465.45410)

Our objection is based on two key points; 1. That the study conducted by the Clinton Administration failed to update the physical land conditions recorded in an inventory that was conducted in the late 1970's, and 2. Those conducting the study failed to inform the public that some of the areas they were asking the public to comment on were no longer roadless areas. Ignoring obvious facts in the study process resulted in misrepresentation of existing land conditions to the public, and a public response that was distorted because of this omission. This whole study became a centralized planning process that produced bad public policy due to inaccurate data, misrepresentation of factual information to the public, and conclusions that were based on factual and process errors.

In our opinion, response to the ten questions listed in the advanced notice of proposed rule making is meaningless as long as the two errors noted above stand. We urge the Forest Service to start the process over, correct an old inventory, and then conduct the study based on local conditions using the local National Forest planning process as the venue for local decisions. (Organization, Rhinelander, WI - #A19070.45400)

The previous "roadless" rule making was just a facade for a decision that was already made. Without any analysis someone got a burr up his butt and decided roadless should be roadless. The lines were drawn over two decades ago! That's at least a generation different. A road back then was something you could drive your father's Oldsmobile on. Today we have an abundance of four-wheel drives, SUV's, ATV's and motorcycles. What wasn't considered a road two decades ago, is now a major access to folks with these improved motor vehicles. We should not, and cannot use these old inventories as current best science. The "roadless" areas need to be re-evaluated with forest plan revisions. (Professional Society, Sheridan, WY - #A28276.45440)

Fishlake National Forest's Strategic Communication Director Linda Jackson, recently confirmed that the inventories from Utah's four National Forests not going through the revision process (Fishlake, Ashley, Dixie, and Manti-La Sal) are seriously flawed. Utah's National Forests are relying on roadless area inventories from 1979. More reliable inventories were conducted in 1983 but never completed due to the passage of the Utah wilderness bill. The timing was not coincidental. Utah's congressional delegation purposefully halted these inventories. (Organization, Missoula, MT - #A21359.45622)

#### **BY ALLOCATING MONEY TO IDENTIFY ROADLESS AREAS NOT CURRENTLY IN THE INVENTORY**

I am very interested in seeing that off-road vehicles be prevented from going into roadless areas, while monies should be allocated to identify roadless areas not currently in the Forest Service's inventories. (Individual, Fort Thomas, KY - #A11699.91221)

#### **BY INVENTORING ALL RESOURCES**

All resources should be inventoried. The historic range should be evaluated, and current solid objectives considered to develop an adjusted desired future condition. There should be an analysis of current activities, and the resource impacts. Forest health conditions, fuel loadings, and burn windows must be reviewed. Historical motorized recreational use and impact should be analyzed. The possibility of road access, considering cost and environmental impacts, must be considered. Possible timber harvest systems should be studied. How will decisions impact local communities, and what job expertise is available in the area is a consideration. And last, how will vegetative management options impact air and water resources in the area. (Association, Kamiah, ID - #A3685.45400)

The other concerns we have are that the roads that were inventoried under Rare I and Rare II during the sixties and seventies need to be looked at to determine if they should have roadless designation. The areas on the Manti have presently used RS 2477 roads. We don't need more roads except to harvest

infested timber and manage the forest properly. (Elected Official, Sanpete County, UT - #A15546.45400)

All the topographic, and other physical characteristics: The existing and potential flora and fauna must be inventoried and mapped; the geographic location in relation to the other similar and dissimilar areas and any cultural developments must be inventoried and accurately mapped and described, the size of the area is very important. (Individual, Paradise, MT - #A11753.45000)

#### **BY INVENTORYING ROADLESS ACREAGE**

It has also been observed that entire roadless areas have been left out of the official list of inventoried roadless areas. There are quite a few environmental groups that have studied the actual roadless areas and have found evidence of gross underreporting of roadless acreage. Please solicit these groups for much more complete inventories. (Individual, Painted Post, NY - #A357.45400)

First the Forest Service needs to start with an accurate inventory of true roadless areas. For years the Forest Service has been barricading existing roads, intentionally leaving these roads off of maps and calling the area roadless. (Individual, Lewiston, ID - #A835.45400)

The inventory of roadless areas that the January rule relied on was completed in 1979. Since that time there has been over twenty years of activity, including forest planning. You are working with dynamic systems not static, plastic Forests. Many things have changed during the years since RARE II including fires, road building, campground development, watershed protection, and the list goes on and on.

Any consideration of conservation of roadless areas must begin with an accurate inventory of what is in reality roadless and undeveloped. Without an accurate inventory the whole exercise will again be a farce, and a violation of plain English. It will not have the respect of the stakeholders, only the small-minded special interest groups. So please start the re-examination with an accurate inventory that you can defend to the American public. (Individual, Ogden, UT - #A878.45400)

#### **BY INVENTORYING PREVIOUSLY UNIDENTIFIED ROADLESS AREAS**

I support protecting inventoried roadless areas from any development while dedicating resources to inventory unidentified roadless areas. (Individual, Asheville, NC - #A911.10150)

I would like to encourage the forest service to identify all the de facto roadless areas that were missed in this most recent inventory and add them to the protected areas. (Individual, Painted Post, NY - #A5297.10157)

Implement the rule as written. Then begin . . . evaluating other roadless areas which the Forest Service missed in their inventories and come up with a plan to protect them, too. (Individual, Olympia, WA - #A4503.10157)

Forest planning should identify uninventoried roadless areas per a consistent and inclusive criteria. Roadless areas should be mapped as starting at the edge of road corridors. Narrow strips of roadless and should be included, if they provide the only unmanaged habitat in the vicinity or the only connectivity between other areas. They should allow inclusion of stumps, logging units, and old roads no longer in use by normal highway vehicles. The guidelines need not be as strict as those for designated wilderness areas. Even with these signs of prior human disturbance, the ecological and recreational values are significant. (Individual, Chelan, WA - #A22174.45400)

#### **BY INVENTORYING AND MAPPING ROADS**

My husband and I regularly use a road in the "roadless" area in the Siskiyou National Forest. We use the road to access our mining claims. The road was built by miners in the early 1950s and since then has been used by miners and recreationalists of all kinds. It is a shame this road doesn't seem to count. It is not a super-highway, but works well even for two wheel drive vehicles. This road should be inventoried

and accurately mapped. There are many roads in the Siskiyou National Forest that are used which should not be closed or considered to be in roadless areas. The radical environmentalists in this area have already been quoted in the local newspaper saying these roads do not exist since they are in the “roadless area.” (Individual, Grants Pass, OR - #A5305.45400)

Inventory all roads currently in existence. Reevaluate whether or not these areas should really be designated “roadless”. Determine what sort of a road system is necessary for fire protection. Do not eliminate any of the existing roads. Take local needs into consideration before removing any roads or restricting travel in the IRAs. (Individual, McCall, ID - #A29305.45400)

In order to evaluate protection and management of inventoried roadless areas you must insure that all pre existing routes in the area have been inventoried and provisions are made in the management process to include routes that may have been excluded. What specific threat is exclusive/inclusive to the roadless areas? Best Conservation Management practices are mandated and applicable to all public lands. The special roadless designation itself segregates the American Public. (Individual, Santa Ysabel, CA - #A26392.45400)

In preparation for our ground-truthing fieldwork, we prepare field maps that show the known coverage of roads from the Forest Service’s digital and mylar layers. When we encounter a motorized route that is not on this field map, we label it as a ghost route. Of the 537 miles of road we traveled this summer, 73.6 miles were ghost routes.\* [Footnote\* all figures tabulated using Geographic Information System software, USFS and HCCA data.]

This example of incomplete information raises a question: How can we effectively manage what we do not fully understand? Before any sweeping decisions about the roadless areas remaining on our National Forests are made, it seems wise to first assess their locations, area, connectivity and dispersal. (Individual, Silverthorne, CO - #A22049.45440)

#### **BY INVENTORING CLASSIFIED AND UNCLASSIFIED ROADS**

Roadless areas must be properly and accurately mapped at the forest level in order that informed decisions can be made. In addition, a complete inventory of existing roads both classified and unclassified must be completed. (Individual, Grants Pass, OR - #A5305.10135)

You cannot manage land without a proper inventory of roads (classified and unclassified), the location of other ownerships whose access must be guaranteed. (Individual, Oroville, CA - #A17888.45400)

#### **BY COMPLETING A COMPREHENSIVE BIOLOGICAL INVENTORY**

Please do not rescind the Forest Service’s Roadless Area Conservation Rule and mandate that the agency do the comprehensive biological inventory which has never been fully done on public lands, insisting that Congress fund this baseline data before any further multi-use activities destroy something irreplaceable in the forest’s biological web. (Elected Official, San Miguel County, CO - #A4549.45400)

The best way to manage roadless areas is as follows:

. . . (6) Conduct a complete biological inventory of the public lands system, and make the results public. (Individual, Dallas, TX - #A18002.30200)

#### **BY USING UNIFORM CRITERIA**

In the forthcoming Forest Plan amendments and/or revisions, it is critical that all the inventoried roadless areas (and other unroaded areas greater than 5,000 acres) be accurately mapped using uniform criteria. At a minimum, this mapping should include all existing roads, both classified and unclassified, and those areas at risk of wildfire, insects and disease infestations. Given accurate information, including mapping, we feel that future management options can be developed and assessed for the total National Forest on a local basis. These decisions will determine what the long-term use of the roadless areas should be, from multiple-use to future wilderness. (Business, Colville, WA - #A3362.45400)

The Forest Service must first provide up-to-date criteria for the delineation of roadless areas. The criteria should be consistently applied to all forests and should include such factors as forest health, wildlife habitat, water quality, scenic values, access to non-federal land, and a variety of recreational opportunities. Roadless portions of inventoried roadless areas should be deleted from the inventory. (Business, Alexandria, VA - #A11684.10135)

NFMA provides sufficient direction for evaluation of roadless areas at 36 CFR 219. The Forest Service should utilize the existing NFMA planning regulations to determine what specific issues need to be addressed on a forest-by-forest basis.

The Forest Service must first provide up-to-date criteria for the delineation of roadless areas. The criteria should be consistently applied on all forests and should include such factors as forest health, wildlife habitat, water quality, scenic values, access to non-federal land, and a variety of recreation opportunities. Economic and social relationships should also be evaluated, including those that directly impact working families and local communities. (Tribal Corporation, Anchorage, AK - #A20340.45000)

The agency should provide up-to-date criteria for the delineation of roadless areas. The criteria should be consistently applied on all forests and should include such factors as forest health, wildlife habitat, water quality, scenic values, access to non-federal lands and a variety of recreational opportunities.

IRA's have opportunities for roadless recreation (motorized and non-motorized), specialized wildlife habitat, and other values that may not be available in roadless areas. These potential uses deserve equal consideration in the evaluation process, but the roadless character should not preclude consideration of a full range of uses, including uses that would require development of roads or other access. The evaluation needs to be site specific in the context of the value and use of the adjacent areas. The analysis should include full disclosure of the consequences of various management strategies on forest health, use opportunities, susceptibility to fire and impacts on adjacent private and public lands and communities.

The agency should also consider:

The nation's need for Timber

The existing recreational uses should be preserved

The opportunity to provide for motorized and mechanized recreation

The management prescriptions in areas contiguous to each IRA

The current and historic uses of the area

Any management decisions that are necessary to improve or maintain existing conditions. (Individual, Richfield, UT - #A30413.50200)

#### **BY USING A SCALE APPROPRIATE FOR PLANNING**

***Informed decision-making*** — *To ensure the rule is implemented with more reliable information and accurate mapping. This includes drawing on local expertise and experience through the local forest planning process.*

The identification of the roadless area should include mapping of the area at a scale appropriate for planning (normally 1:24,000). The roadless areas identified and mapped should be used to update the list of roadless areas identified and listed in the FEIS of the roadless conservation rule. (Civic Group, Roanoke, VA - #A1713.45400)

#### **BY HAVING AN INDEPENDENT THIRD PARTY COMPLETE A SCIENCE BASED INVENTORY OF ROADLESS AREAS AND FEATURES**

I recommend that the US Forest Service does not act in haste to implement a "Roadless Area Conservation" plan that is improperly developed and inappropriate to the needs of the specific forest being considered as well as the needs of the nation at-large. Complete, instead, a third-party review of "roadless" areas, and develop conservation of these areas using NFMA and NEPA. The Forest Service will undoubtedly receive many comments on this proposed action. (Individual, Reno, NV - #A21755.10130)

*Much work has been completed since the 1970s toward inventorying Forest Service lands. The results of this work can be used as the basis of an expanding inventory; supplemented with additional necessary work.* The Forest Service should specifically describe and inventory the physical areas that are proposed for “roadless designation. Subsequent to this the agency should carefully inventory and describe the legal (in-holdings and other designated areas), man-made structures and/or features (roads, buildings, dams, canals, etc), natural resource potential, environmental, social and cultural values or characteristics within the areas designated. This needs to be completed by an objective, science-based third-party review. (Individual, Reno, NV - #A21755.10137)

There appears to have been little objective study of the areas that have been designated as roadless. I know there was an effort by special interest groups to have field volunteers do on-the-ground surveys of areas that were included in the roadless area designations.

As most of the area under proposed roadless designation probably has air photo coverage, a systematic examination should be conducted by independent professionals before the discussion even proceeds.

Please contact me if there have been such studies conducted, so I and other interested parties can examine the results of such systematic surveys. (Individual, Aurora, CO - #A773.10135)

#### **BY INCLUDING LOCAL, STATE, AND FEDERALLY ELECTED OFFICIALS IN THE PROCESS**

Accurate mapping and inventory processes must be completed so informed decisions can be made. Local and state and federal elected officials must be included in this process. (Association, No Address - #A25990.45400)

#### **BY USING THE CRITERIA LISTED IN THE FOREST SERVICE PLANNING HANDBOOK**

One of the early steps in the revision of Forest plans is to update the inventory of roadless areas. The inventory should be conducted according to criteria listed in the Forest Service Planning Handbook. In many cases the Forest inventory of roadless areas conducted in accord with these criteria will be changed substantially from the inventory that was conducted during RARE II, which is the most current inventory for many Forests at this time. (Civic Group, Roanoke, VA - #A1713.45400)

#### **THROUGH STAND EXAMINATIONS**

Existing Roadless areas may be in desperate need of active management to reduce forest insect and disease incidence and fuels, improve forest tree vigor, provide for desirable flora and fauna species from both the ecological and from mankind’s perspectives, and to support local recreational and forest product utilization activities.

Obviously a complete inventory of forest stands and conditions must be made through the stand examination system and other inventory measures. Recreation potential evaluation must utilize accurate maps indicating cultural improvements as well as topographic features on a small drainage-by-drainage basis. The existing forest planning procedure is quite capable of this necessarily intensive inventory and analysis. (Individual, Paradise, MT - #A11753.45000)

Stand examination and other inventories must be made, and all existing and predicted future conditions must be accurately described and mapped. Only then can officials bring forth the data and provide necessary analysis to the interdisciplinary team and the public. (Individual, Paradise, MT - #A11753.30110)

#### **WITH CITIZEN INVENTORIES**

Another flaw in the Clinton rule was that it only addressed RARE II areas. As you know RARE II was litigated and the Ninth Circuit Court of Appeals found that the inventory was insufficiently site-specific and did not consider a sufficient range of alternatives. The UEC, as well as other environmental groups in the west, have been conducting roadless area surveys of National Forest lands. The UEC has surveyed all six of Utah’s National Forests and has found and documented an additional 70 roadless areas that meet all of the criteria for roadless designation. These 70 areas provide at a minimum (some areas are larger than the 5,000 acre minimum requirement) at least 350,000 additional acres of roadless lands that were not included in the RARE II inventory, and deserve protection under any roadless policy the Forest

Service implements. The Forest Service should make a concerted effort to obtain all citizen inventories, verify the documentation and add these areas to the RARE II inventory so they are all afforded the protection under any roadless policy. (Organization, Salt Lake City, UT - #A17170.10157)

The 1979 RARE II EIS did an extensive review of roadless areas in National Forests. The EIS noted that “The public was asked to suggest additions to or deletions from an inventory of roadless areas, and to suggest which should be used to evaluate those areas for wilderness or nonwilderness use”, (page iv). This same opportunity to suggest boundary revisions was NOT afforded in the rulemaking that culminated on January 12, 2001. Any future rulemaking must make that a clear directive. (Business, Wright, WY - #A23085.15100)

Another flaw in the Clinton rule was that it only addressed RARE II areas. As you know RARE II was litigated and the Ninth Circuit Court of Appeals found that the inventory was insufficiently site-specific and did not consider a sufficient range of alternatives. WildLaw, as well as other environmental groups, have been conducting roadless area surveys of National Forest lands. WildLaw has surveyed all of Alabama’s National Forests and has found and documented additional roadless areas that meet all of the criteria for roadless designation. The Forest Service should make a concerted effort to obtain all citizen inventories, verify the documentation and add these areas to the RARE II inventory so they are all afforded the protection under any roadless policy. (Organization, Montgomery, AL - #A27512.45300)

Inventoried Roadless Areas in Utah are woefully short of the actual acreage to be found. Every forest in Utah failed to identify all roadless areas. Historically the last round of FS planning took place at about the time of the 1984 Utah Wilderness Act. The forests in Utah believed that act eliminated their obligation to identify roadless areas in Utah during the last round of Forest Plans.

In the past we have submitted maps which identify roadless areas in the Moab and Monticello Ranger Districts in the Manti-La Sal National Forest. Field work completed by Red Rock Forests indicates there is much more roadless acreage than the FS identified with RARE II. We believe this is typical of all national forests in Utah with the possible exception of the Wasatch-Cache NF. That forest accomplished a good inventory in its last analysis of the current situation. We would be glad to share our maps with the Forest Service again if you wish. Shortly we will have the maps available in a GIS format which to local ranger district could use in planning. (Organization, Moab, UT - #A30528.45622)

I attended two of the National Forest Service Roadless Area Open Houses, the Sweet Home of WNF and the Suislaw NF in Corvallis, Oregon. **Neither of these informational meetings had maps detailing the “other smaller Roadless Areas” of less than 5,000 acres that were not inventoried or included in Appendix C of the NW Forest Plan.** Many of the public kept asking to see maps delineating “just what are the 1,000+ to 5,000 acre, non-RARE I or II Roadless Areas”? Some districts do have in their database, or even mapped in pilot studies the boundaries of the smaller RA’s. **This was a frustrating and bad omission on the part of the Forest Service to hold these informational RA open houses without public access to these maps.** Some FS staff claim that these areas are not inventoried, hence no maps available. If that is the case, district by district, I strongly suggest/propose that **all of these significant RA’s are updated with current inventories and mapped for consideration in this proposal. Much of the data for this already exists.** (Organization, Albany, OR - #A19057.10152)

#### **476. Public Concern: The Forest Service should integrate the best available information from its own road inventories.**

##### **BY USING CURRENT GEOGRAPHIC INFORMATION SYSTEM DATA**

In addition to maintaining the integrity of inventoried roadless areas, the rule should immediately integrate the best available information from its own road inventories. This can be done from existing information in most areas and should not be delayed. The Forest Service should use current Geographic Information System road inventory coverage’s to identify the many roadless areas over 5,000 acres that were not identified during past RARE and Forest Plan inventories. By simply taking a look, the Boise

National Forest recently identified three roadless areas over 5,000 acres (totaling 26,000 acres) that it had overlooked during earlier inventories. The new information for each National Forest nationwide should not be limited to identifying roadless areas over 5,000 acres however, but should also identify roadless areas between 1,000 and 5,000 acres that were never before considered important. These smaller areas are important for ecological reasons (see below for more details).

According to Interior Columbia Basin Ecosystem Management Project (ICBEMP) data, Idaho roadless areas have much greater ecological integrity than other Forest Service lands in the state. Of 12 million acres in Idaho that ICBEMP identified as having high ecological integrity, nearly 8 million of those are in roadless and Wilderness areas. These areas also protect 25 percent of habitat for Chinook salmon, steelhead, bull trout, and westslope cutthroat trout in Idaho, and provide 75 percent of the strongholds for all salmonid species in Idaho according to the ICBEMP. Roadless areas are also the most risky areas for development and subsequent erosion, containing nearly 30 percent of all of Idaho's steep slopes. (Organization, Nevada City, CA - #A4941.45440)

**477. Public Concern: The Forest Service should consider that there was an inconsistent application of data entry standards when roadless areas were inventoried.**

According to the Forest Service's own data, there are over 421,000 acres of private lands and 43,000 acres of State lands within inventoried roadless areas in parcels ranging in size from five acres to hundreds of acres. As noted above however, this database may or may not have been entirely accurate since we understand that there was inconsistent application of the data entry standards. Therefore, an accurate analysis of lands potentially affected by the roadless area regulation was impossible. (Organization, Rapid City, SD - #A17011.45400)

**478. Public Concern: The Forest Service should provide a physical description of the areas proposed for roadless designation.**

The Forest Service should specifically describe the physical area that is proposed for "roadless" designation. Subsequent to clearly defining the proposed "roadless" areas, the agency should carefully inventory those areas and describe the legal inholdings and other designated areas, man made structures and/or features (roads, buildings, dams, canals, etc.), the natural resource potential of the area (as described in ANPR Question 5 above), environmental characteristics, and social and cultural areas of value within those areas proposed for designation. Such descriptions should be as objective as possible and should not attempt to rate or prioritize the items described. Much work has been done since the 1970s in inventorying Forest Service lands. The results of this work can be used as the basis of this inventory, supplemented where necessary with additional work. (Association, Novato, CA - #A17652.45400)

## Definitions

### Summary

Both those who ask that the Roadless Area Conservation Rule be implemented and those who ask that it not be implemented ask the Forest Service to clearly define terms used throughout the rulemaking process. These include such terms as road, road building, roadless, and unroaded. Not only do respondents say these terms are problematic, they also request the Forest Service clarify the relationship between them. Another point of confusion mentioned is whether roadless areas contain roads or not.

**479. Public Concern: The Forest Service should define certain terms.**

#### ROAD

The definition of a road must be broadened to reflect the reality of what is on the ground. It is unacceptable to define a road such that only mechanically maintained/constructed roads qualify. Lots of

traffic passes through our national forests on roads that were not mechanically constructed. These roads should not be defined out of existence. (Individual, No Address - #A50.45200)

Your first question is not fair because you asked for the role of the forest service in “roadless” areas. The statement of roadless and your definition of a road in itself makes your task easier. I define a road as a two track road and that is where the debate begins. My definition of a road and your definition of a road is as different as the number of acres the forest service is looking at to change or enact your roadless management plan. (Individual, Elko, NV - #A4853.45200)

If the agency decides at this time to adopt “roadless protection” guidance or directives to be applied by agency personnel in the local forest planning process, those directives should address the following:

The definition of “road” should be clear. In deciding at the forest plan level what activities can take place within protected roadless areas, it should be clear what does and does not constitute a “road”. Consistent with the Clinton Administration’s approach in the January 12 Roadless Conservation Rule, ski trails and ski ways should not be considered roads. Likewise, temporary roads and/or roads used on a seasonal basis for maintenance purposes should not be considered “roads”. These are typically service roads with no public access for vehicle transport. (Permit Holder, No Address - #A5285.45200)

I would like to see the definition of a road changed to include all existing roads including all unmaintained roads such as two tracks. These roads have been used by hunters and anglers for generations and provide important access to most people as they can not walk or ride horseback into the “Roadless Areas”. This has been my biggest objection to the “Roadless Plan” from day one. (Individual, Casper, WY - #A5080.45514)

My first concern is for the appropriate identification and definition of what a roadless area really is. The current inventory has many roads in many of the areas. The current roadless inventory is based on some antiquated standards and it makes the procedural aspects inconsistent. The process of a consistently applied roadless determination has been tried several times but each time the process was based on a sort of predetermined agenda. I was involved in both RARE’s. Both had considerable variation in the interpretation of direction information and the application of definitions. Correction of inconsistencies and appropriate definitions of roads and their influence would be a place to start. That makes the footing more equal in the mapping and the terms must be consistently and sensibly applied and defined. I am aware that 3 Forests in the Intermountain Region have not handled the map corrections, interpretations and applications similarly. Above all, the definition about what constitutes a road must be looked at in a more practical way, as well as what is the extent of influence by a road. For example much of the western United States is traversed by roads referred to as “four-wheel drive roads”. These “roads” access numerous kinds of developments essential to the management and/or enjoyment of these lands. The “greens” (preservation organizations such as the Sierra Club/ Earth Justice/Earth First!, etc.) in their lawsuits and appeals recognize them and often refer to them as “ghost roads”. Many people of the West identify these areas and say that the roads are present. They correctly point out the areas are not unroaded and vehicle traffic is not uncommon. Many of these areas have, or until recently, had no vehicle restrictions in the management plans or traffic plans for the area. Many of these areas contain numerous roads of this type and are now in the areas mapped and inventoried as roadless. Timber sale areas with an extensive net work of closed logging roads are defined as roadless. Several areas with RS 2477 roads or poorly maintained access roads to private in-holdings or mineral rights exist. In-action by the agency to deal with such roads requires that they be determined as a road, regardless of definition. Your recent unilateral Roads Policy has not settled the issue of these roads. In fact your dogmatic use of the definitions has increased the public perception of ineptness. (Individual, Cambridge, ID - #A11714.45200)

Definition and consequent classification of a road should be *strictly* held to full circumstantial, contextual framework and historical origins of the road: I.e., roads constructed in part or in full to circumvent (intentionally or not) some ecological/biological considerations that would prevent, say,

timber harvest, roadless definition, inappropriate recreation developments, etc. should not be considered roads that would prevent serious roadless inventory considerations. In fact, such circumspect activities should be considered with appropriate penalty of the law. Looking at another but related area for just one moment, is not the spirit and letter of the Endangered Species Act (ESA) designed to prevent a trend toward listing??? Is not the roadless rule to accommodate similar processes (i.e., *reduce the trend* in road increase)??? (Individual, Ewen, MI - #A17662.45200)

#### ROAD BUILDING

“Road building” is repair/maintenance of existing roads “building”? or is building in a new road where none existed before “road building”???? (Individual, Tucson, AZ - #A5625.10135)

#### UNROADED

What is the meaning of the term “unroaded”? Roadless means there are no roads within a specific area and roaded means that there are indeed roads within a specific area. The term “unroaded” is not in the NFMA, nor in any approved regulation. This term is used for no other reason than to circumvent legal descriptions . . . of what constitutes a road that has been handed down in Federal Courts.

Under RS-2477 Rights-of-Ways, the definition of a road in part states that “the mere passing of people and goods constitutes a road”. There are at this time over 90 such Rights-of-Ways legally filed and recorded in the courthouses of Shoshone, Clearwater and Idaho Counties. There are nationwide conservatively probably over a thousand of such rights-of-ways filed and recorded that have not been addressed, other than the invention of what constitutes a road ignoring legal law. These have not been addressed anywhere in this proposal. (Organization, Orofino, ID - #A8393.45200)

The Agency needs to clearly define “unroaded characteristics.” (Association, Salem, OR - #A21754.45200)

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. Consistent with current Forest Service roadless area inventory policy, both categories should provide greater leeway for roads and other development features in eastern national forests. (Organization, Denver, CO - #A21367.45100)

#### ROADLESS AREA

My concern with the entire concept of roadless areas is that they are not scientifically defined. One has only to look at the United States Department of Interior Geological Survey maps of Elko County to realize that the area is not roadless. In my experience in traveling these roads, I have never found one that does not have a reason for existence. None are there for any purpose. Those that once were necessary, and now are no longer needed, have disappeared and been obliterated by time and nature. Wheeled access to Elko County is necessary for all the citizens. Even backpackers use these roads to reach wilderness areas. (Individual, Elko, NV - #A4868.45100)

It is clear that existing roads (classified, unclassified and temporary) are present in “Inventoried Roadless Areas,” but there is no guidance for “responsible officials” to use in determining the maximum threshold amount of roads that can be present in an area below which the area can still be considered for inclusion in the Inventoried Roadless Areas. This decision appears to be left to the discretion of the responsible officials and is, therefore, arbitrary in its nature. To promote uniformity and consistency through the National Forest System, what constitutes “roadless” relative to the presence of previously existing roads must be more clearly defined in the regulations. Item (5) under “Roadless Area Characteristics,” for example, could lead to the conclusion that the presence of any classified, unclassified or temporary roads would exclude an area from the “Inventoried Roadless Areas.” Yet, this is clearly not the case. The definitions of Inventoried Roadless Area lack clarity. (Organization, Fullerton, CA - #A3705.45513)

The starting point of my comment is that the condition of being roadless is an artificial and an unscientific basis for classifying land for the uses that will be allowed. After all, two-hundred years ago the entire western area was roadless, but that did not deter its settlement and use according to its suitability. The process was not perfect, but a vibrant and productive economy arose from decisions that were correct more often than not. (Individual, Missoula, MT - #A4987.45500)

Let us dispense with the rhetoric and cut to the meat of the issue. Let's give the hackneyed phrase "Roadless Areas" a rest. Because Roadless Areas represent the only inviolate remnants of unprotected public land, let's use "inviolate remnants" when addressing RARE II Inventoried Roadless Areas, if only for the purpose of this correspondence. (Organization, Republic, WA - #A6302.45100)

We advocate that the broadest possible definition of "roadless" be used and require a definition that is at least as broad as that used in the RARE II process. Some evidence of past human disturbance should not disqualify an area from being designated as a roadless area. (Organization, Cave Junction, OR - #A17235.45200)

Clearly, the Forest Service needs to reiterate and clarify the definition of "roadless area" and require individual forests to abide by it. We strongly urge the agency to clarify the roadless area definition to include:

All previously inventoried roadless areas except those that have subsequently been deliberately roaded by the Forest Service through a NEPA process; 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. (Organization, Denver, CO - #A21367.45100)

#### **480. Public Concern: The Forest Service should clarify the relationship between inventoried roadless areas, unroaded areas, and classified roads.**

##### Definitions

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 through a NEPA process; 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. Consistent with current Forest Service roadless area inventory policy, both categories should provide greater leeway for roads and other development features in eastern national forests. (Organization, Missoula, MT - #A21359.45100)

##### The Forest Service Should Consistently Use Historic Definitions of Roadless Areas.

The Forest Service needs to clear up the confusion over the relationship between inventoried roadless areas, unroaded areas, and classified roads. We are concerned that the Forest Service underestimated the total roadless acreage in Region 2 by using an unsupported and inappropriate definition of a road. Both the Arapaho-Roosevelt and White River National Forests based roadless area inventories prepared during the forest plan revision process on a definition that conflicts with the RARE II definition of a road and the definition in the Forest Service Handbook. We suspect that this inappropriate definition may have been applied to inventories elsewhere in Region 2 and perhaps in other regions, and strongly urge the Forest Service to ensure that roadless area inventories are based on the appropriate definition in the final rule.

To the best of our knowledge, the Forest Service has for decades interpreted the term “improved road” to mean a route constructed and maintained for use by two-wheel drive, low-clearance vehicles. Despite these historic definitions, the White River National Forest recently completed an inventory as part of its plan revision using an overly restrictive standard that excluded from its roadless area inventory, areas that the Forest Service found were not capable and suitable for wilderness designation. This extremely restrictive standard included -- visual and auditory impacts from developed areas, defensibility of the area against prohibited uses, future planned timber sales, and existing motorized off-road vehicle use. None of these standards is relevant to any of the prohibitions or procedures in the proposed roadless areas conservation rule; therefore lands excluded from the roadless area inventory through the application of these irrelevant standards should be included in the rule making. For example, the Forest Service discounted all acreage within Copper Mountain Ski Resort’s master development plan boundary even though it is completely roadless. It also appears that the Forest Service did not include Independence Mountain adjacent to the Keystone Ski Area as roadless even though it is clearly roadless. (Organization, Denver, CO - #A21367.45200)

There is a distinct difference between “unroaded” and “roadless” areas. The rule does not clearly differentiate and keep those two categories separate. The roadless rule *should not* include unroaded areas. (Elected Official, Crook County, WY - #A15545.45200)

**481. Public Concern: The Forest Service should accurately label unroaded and roadless areas.**

**SO THAT OPPOSING INTERESTS CAN UNDERSTAND THE ACTUAL SITUATION ON THE GROUND**

My biggest other concern is the fact that the inventoried roadless areas are an absolute fraud being pulled over on the unsuspecting public and political representatives; this is because these areas can and often do have roads within them. And further many historical roads, truck roads, and abandoned railroad beds, particularly in the eastern Weeks Act Forests, are not even considered ‘roads’ under the inventoried roadless definition. Because of this, many well intentioned citizens and elected officials believe that by supporting the “roadless initiative” they are supporting the protection of pristine areas untouched by humans; that is false. The reality is far different and varies from National Forest to National Forest. The effect of the “roadless initiative” in many cases is an anti-history campaign based on the misinterpretation of the roadless inventory. This is a lexicological disaster that could be partly remedied by relabeling the “roadless”, “unroaded”, and other forest transportation based categories with accurate terms more in keeping with common usage. The result of accurate labels would be a discussion in which those on different sides of the issue at least understand the actual situation on the ground. (Individual, Center Sandwich, NH - #A5698.45000)

**482. Public Concern: The Forest Service should not define areas covered by special use permits or mineral leases as roadless or unroaded lands.**

We suggest that areas covered by special use permits or mineral leases be defined [not as] roadless or unroaded lands. Among these areas are those covered by grazing permits, water diversion facilities and ditches and canals, telecommunication sites, mining claims, road and water easements, and recreation developments. (Elected Official, Douglas County, OR - #A11811.45000)

We suggest that areas covered by special use permits or mineral leases be defined as not roadless or unroaded lands. Among these areas are those covered by grazing permits, water diversion facilities and ditches and canals, telecommunication sites, mining claims, road and water easements, and recreational developments. (County Attorney, Grant County, OR - #A17667.90100)

**483. Public Concern: The Forest Service should refer to areas with roads or motorized trails as unroaded, not roadless.**

The regulations should not use the word roadless (except in reference to Inventoried Roadless Areas). The connotation of the generic term “roadless” has been a great source of confusion to the general public

throughout the prior rulemaking. An area should not be referenced in any agency documentation in the general sense of roadless or roadlessness. Areas without the presence of roads or motorized trails should be referred to as “unroaded”, not roadless. Unroaded should be defined as any area which does not contain any roads (whether such roads are categorized as classified, unclassified, or uninventoried) or motorized trails. (Organization, Chesapeake, VA - #A11804.45200)

**484. Public Concern: The Forest Service should not use the term roadless to describe areas containing forest products necessary for the future operation of the timber industry and community recreational roads and trails**

It is our understanding that the Clinton-directed review process will establish criteria and procedures that may negatively impact public access to forestlands. 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. (Association, East Lansing, MI - #A23868.45000)

**485. Public Concern: The Forest Service should not use the term non-road.**

I value having access to our national forest land. I know that there are many possible uses for the land and that there is obviously conflicting opinion about what should or should not be done.

I think the whole term “non-road” is ridiculous. (Individual, Cincinnati, OH - #A4027.45200)

**486. Public Concern: The Forest Service should clearly differentiate between a road and a trail.**

... as off-road vehicles continue to grow in size, the Forest Service continues to increase the width of what they consider to be a trail versus a road. The definition of “road” must clearly differentiate a road from a motorized route or non-motorized trail “on-the-ground,” and not depend on the language “unless classified and managed as a trail.” 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.

The old definition was tied to the fact that most ORVs were 50 inches or less in size, even though ORV routes are usually greater than 50 inches in order to accommodate the vehicles. The new definition simply says that the travelway has to be more than 50 inches wide.

We ask that the following be included as part of the Roadless Area Conservation Rule:

A) we propose dropping the classified/unclassified road distinction and simply defining a “road” as:

“a general term denoting a travelway that is legally and intentionally constructed and regularly maintained by mechanical means, for purposes of regular and continuous travel by standard passenger vehicles.”

B) Unclassified roads would no longer be termed roads, but instead termed “unauthorized motorized routes.” (Organization, Missoula, MT - #A21359.45200)

## Environmental Values

This section includes 11 subsections: Environmental Values General, Evaluation of Roadless Areas, Management, Water Quality, Air Quality, Soils, Scenery, Wildlife, Wildlife Habitat, Threatened and Endangered Species, and Vegetation and Botanical Resources.

### Environmental Values General

#### Summary

**General Comments** – A number of respondents comment on environmental values. The most general comment on this topic is that the Forest Service should preserve the environment. Suggested reasons for this include the need to protect global ecosystems, to help stop deforestation, and to preserve unique climates. Respondents suggest that preserving the environment can be done by monitoring traffic, encouraging the establishment of conservation associations, and encouraging the signing of the Kyoto Treaty. Others suggest that the Forest Service should hold the Administration accountable for maintaining environmental safeguards. Some state that the Forest Service should revise forest plans to address environmental concerns. Others advise the Agency to avoid relying on planned mitigation to offset environmental effects. Conversely, some say that pre-settlement conditions are not attainable and should not be held as a goal.

**Roadless Area Environmental Values** – Respondents offer a number of comments requesting the protection of roadless areas for environmental reasons. These writers assert that the Forest Service should consider ecological values when evaluating roadless areas. According to respondents, roadless areas should be protected to preserve ecological values, to increase representative ecosystem types, to preserve biodiversity, to restore surrounding areas, and to set an example for other countries. In order to protect these roadless area values, some people recommend that the Forest Service implement the Roadless Area Conservation Rule, while others comment that the protection of roadless areas should not result in increased damage to roaded areas.

**Adequacy of Analysis** – Some respondents comment about the adequacy of the analysis of environmental values. These people advise the Forest Service to make decisions based on science in order to allow ecosystem management to be the prime objective and to ensure sustainability. Some suggest that the Forest Service should adequately evaluate environmental impacts, particularly the environmental impacts of modern problems such as acid rain and global warming. Similarly, some ask that the Forest Service take into consideration the effects that environmental destruction will have on a global level. Others believe the Forest Service to protect roadless areas in order to enable the study of the long-term effects of timber removal; and others add that there is a need to “identify native biological communities that are poorly represented in current roadless areas and restore roadless areas that could support these rare communities.” On the other hand, some assert that the concept of biodiversity is a fraud. According to one individual, biodiversity does not acknowledge evolution and seems to replace it with an unchanging environment. This person claims that recent studies have proven that a healthy environment is reflected in fewer species.

**Funding** – In comment on roadless area environmental values, some focus specifically on the matter of funding for the desired actions or resulting impacts. Some respondents assert that the Forest Service should use money allocated for roads to fund ecosystem management and protection of wildlife, or they request funding for the study of ecology. Respondents also ask that the Forest Service identify funding necessary to relocate, reconstruct, or maintain the existing routes to ensure compliance with existing environmental requirements. Others mention funding for the prevention or restoration of environmental damage. One individual suggests that the Forest Service require those who ask that road construction be allowed to bear the costs of damage to affected ecosystems while others request funding for reclamation projects, including research on the effects of habitat degradation.

**Education** – Several respondents suggest that the Forest Service educate the public. Suggested topics of education include the environment and ecology, the costs of environmental degradation, conservation goals, and the need to make productive use of forests.

**487. Public Concern: The Forest Service should hold the Administration accountable for maintaining environmental safeguards.**

President Bush's administration needs to remain representative and respond to the environmental concerns of his constituency and the legacy of future Americans. Supporting technologies and industries that undermine our country's legacy rather than training workers in those fields, for new environmentally sound industries, is the height of hubris. I call on you to hold the administration accountable for its efforts to weaken the environmental safeguards and public participation opportunities in the forest planning regulations. (Individual, Northridge, CA - #A21249.12111)

**BY DEMANDING AN EXPLANATION OF HOW IT INTENDS TO FURTHER PROTECT NATURAL RESOURCES**

I demand a response detailing what the Bush Administration intends to do about further protecting our national resources like the Tongass National Forest. (Individual, Ithaca, NY - #A16541.12111)

**488. Public Concern: The Forest Service should adequately identify forest environmental values.**

The environmental values of the forest should be identified. For example, many forests have the potential for the overgrowth of trees. As the ranger at Hone Quarry indicated, some areas of forest can become too dense or matured. In such cases, they allow for the timber extraction of these trees. The ranger added that when the national forest permits local timber companies to come in and remove these trees, they usually only need minimal roads to do the task.

Other environmental values to consider are the species in the forest. Again, the ranger commented that even within a small cubic region, a huge number of species of organisms and plants probably exist. Obviously, if these areas are not designated as roadless, construction in these areas will endanger the survival of these species. In George Washington National Forest, black bear and wild turkey populations in the area are in direct competition with increasing public use and development. Hence, in order to protect all the living entities in a forest, most areas should remain roadless. (Individual, No Address - #A30370.50000)

**489. Public Concern: The Forest Service should recognize that preservation values have already been adequately addressed.**

Rather than preserving a long, extensive list, I will refer the reader once again to the Roadless Area conservation FEIS (on which the current Rule is based), Chapter 3, which covers topics ranging from physical resources to American Indian issues. It should be clear that the issues covered in Chapter 3 are exhaustive and in no need of enhancement. Of prime importance to me are the values of watershed protection, wildlife habitat, and low-impact recreation. It is important to note that all of the stated concerns behind the current efforts to amend the Rule (forest health, fire management, access issues,

local input, etc.) have already been painstakingly and adequately addressed and resolved by the Rule itself. This is clear to anyone who has taken the time, as I have, to actually review the final document. The Rule has provisions for fuels-reduction thinning and habitat improvements for endangered species among other concerns. This fact compels me to, once again, suggest that the original Rule be implemented as written and published. (Individual, Sedona, AZ - #A17217.50000)

These factors were considered thoroughly in the Environmental Impact Statement. First and foremost should be consideration of the ecological values that these areas will provide, including value as intact habitat for plants and wildlife, as a corridor between key habitats, and as fully functional, healthy ecosystems. (Individual, Olympia, WA - #A20847.50100)

#### **490. Public Concern: The Forest Service should preserve the environment.**

##### **TO PROTECT GLOBAL ECOSYSTEMS**

Protecting forests implies the protection of biodiversity, the atmosphere, soils, the Earth and its inhabitants. A forest is not something separate from the whole. It should not be viewed that way. Instead it is part of an entire planetary system, which can cause significant alterations to the Earth's atmospheric dynamics. We have reached a fulcrum, it is time we protected all remaining forests. This means no mechanical intrusions and no intentional burning other than those created by lightning strikes. Existing forest covers should be extended through the encouragement of natural extension systems. (Individual, Curtain Act, Australia - #A29708.50100)

##### **TO HELP STOP DEFORESTATION**

There is widespread publicity about worldwide deforestation, and public uproar about it. Can't we protect our own forests? It is so much easier to say that other people cause the problems. In reality, we must all act responsibly. (Individual, Spokane, WA - #A26820.50420)

##### **TO PROTECT ECOLOGICAL SYSTEMS**

In the case of forests, tampering any further with already too-diminished wild forest acreage will endanger the ecological services these forests provide—air and water purification, spawning fish and game, maintaining a reservoir of biological richness and diversity (both as a good in itself and as the seed stock for rehabilitating and restoring forest land degraded by past logging, mining, etc.). (Individual, Pasadena, CA - #A11735.30100)

##### **TO PRESERVE UNIQUE CLIMATES/ECOSYSTEMS**

The United States of America is home to many ecosystems/climates that are present NO OTHER PLACE ON EARTH but in our country. These ecosystems will not be able to sustain themselves without the presence of established trees and the niches they fulfill! For example, Washington and Oregon contain the ONLY mild climate, temperate rainforest on the planet. Without the native Redwood trees, which sustain that ecosystem, those two states wouldn't have the same climate, wildlife or beauty. Removing these Redwoods would also lead to soil erosion and exhaustion. THESE FACTS ARE SCIENTIFICALLY PROVEN!!! So why then would the President, who has been elected to make decisions that better our country, want to deplete the land and ecosystems contained within its borders? (Individual, Harper Woods, MI - #A40537.50510)

##### **BY TAKING A LONG-TERM VIEW**

The principal responsibility of the forest service is to be guardians of the lands they manage. Emphasis must be put on the soils, the waters, the wildlife, and the vegetation in any management plan. The Forest service must always see the big picture as their primary responsibility and think of the consequences of any actions in a 25, 50, or 100 year time frame. National Forest lands belong to all the citizens of the United States, most of whom cherish these lands. Although any individual has the right to express his opinion, this opinion should not be allowed to outweigh the importance of protecting the land. (Individual, Reno, NV - #A23545.50100)

**BY PROTECTING LOW-ELEVATION ECOSYSTEMS**

In the Southern Rockies and throughout the nation, many ecosystems are not adequately represented in our current system of protected areas, such as national parks, wilderness areas, and research natural areas (Scott et al. 2001). For instance, here in the Southern Rockies, SREP discovered that roughly 70% of the region's protected areas lies above 10,000 feet, thus capturing mainly high-elevation ecosystems, such as subalpine forests and alpine tundra, as well as hundreds of thousands of acres of bare rock and snowfields. As a result, numerous natural communities are either poorly represented or missing entirely in the current system of protected areas. This finding is mirrored by the Forest Service's analysis of the plant ecosystems represented within designated wilderness in Region 2: over 90% of these lands are found within three ecosystem types—rock and ice, alpine tundra, and high-elevation Engelmann Spruce-subalpine fir. (See Appendix 3: Plant Series—Rocky Mountain Region: Wilderness and Management Areas). In contrast, 60% of the roadless land area in the Southern Rockies lies below 10,000 feet in elevation and contain significant amounts of low- and mid-elevation ecosystems that are not well represented in the current system of protected areas. (Organization, Denver, CO - #A21367.60400)

**BY MONITORING TRAFFIC**

After the roads are built, will the government have the ability to adequately monitor the "health" of the local environment to ensure that the traffic on the roads is not proving to be too detrimental to the local flora, fauna, watershed, etc.? If the government finds that unexpected damage is occurring, will the government have the ability to close the roads and allow the area to become 'roadless' once again? (Individual, Columbus, OH - #A659.50000)

**BY REWARDING FOREST SERVICE PERSONNEL FOR MAINTAINING AND IMPROVING HEALTHY ECOSYSTEMS**

Reward USFS managers and staffers for maintaining and improving indicators of healthy ecosystems and overall biodiversity levels. (Individual, Dallas, TX - #A18002.30200)

**BY ENCOURAGING THE ESTABLISHMENT OF CONSERVATION ASSOCIATIONS TO HELP PROTECT ECOLOGICAL FOREST VALUES**

I expect that if the Forest Service were to preserve some fraction of their lands in a pristine state, it would find that non-profit organizations similar to the National Parks Conservation Association (NPCA) could be set up to support this effort. Why not a National Forest Roadless-Area Conservation Association to help tap into private resources for protection of the ecological values of the forests? (Individual, State College, PA - #A28680.15121)

**BY ENCOURAGING THE SIGNING OF THE KYOTO TREATY**

Personally I'd like to comment that the world belongs to us ALL. Logging of forests has been done all over the world for many centuries. The devastating effects are also C L E A R. Have a look at Ireland: there used to be lots of forests, but now less than 10% of the country is forest. If you plan to let the world go down, we cannot accept that. Your plans are like plans made in the 60s, where environment didn't matter as much as it does nowadays. Maybe I'm not making it clear, but I'm pretty much angry to see how (at distance, I'm from the Netherlands) things are being . . . up at the other end of the ocean!!!! Instead of reducing energy consumption, you just want to mine for more (fossil) energy! As reason you're telling that it's good for the American economy. Let me tell you this: if you keep on executing actions and plans like this, there will be no future. There will be no American Economy anymore. There will be no more, a world in which people, plants and animals can live because of all the polluting and molestation actions. I highly suggest you take a 2nd look at your conservation rule, and have a 2nd opinion in other (European) countries. And last but not least: SIGN THE KYOTO COMMITMENT!!!!!!!!!! (Individual, No Address - #A3752.50400)

**491. Public Concern: The Forest Service should revise forest plans to address environmental concerns.****THE NORTHWEST FOREST PLAN**

The Northwest Forest Plan must be revised. The old growth cannot be saved. LSR is not favorable to water production. Snag retention must be eliminated. Heavy fuel retention must be eliminated. The

recreation of wetlands must be monitored so that something is not created that will do more harm than good. Fire will not eliminate the medium to heavy ladder fuels. (Individual, Klamath Falls, OR - #A8809.20000)

**492. Public Concern: The Forest Service should avoid relying on planned mitigation to offset environmental effects.**

The project should not be mitigated in order to continue. We should not rely on planned mitigation. This is simply attempting to fix things after a planned resource failure. In so many cases these so-called projects are referred to as timber, road, mining or grazing “opportunities”. The strategy of messing up the ecology for someone’s (usually a local citizen) monetary gain, and then attempting to fix the mess makes no sense at all. (Individual, Grangeville, ID - #A830.50000)

**493. Public Concern: The Forest Service should consider that the Roadless Area Conservation Rule will promote the use of less environmentally friendly products.**

Contrary to the implied conclusions of the analysis, the preferred alternative(s) will . . . promote the use of less environmentally friendly products . . . (Professional Society, Anchorage, AK - #A21707.20201)

**494. Public Concern: The Forest Service should recognize that pre-settlement conditions are not attainable.**

It seems to me that the organizations or special interest groups that are backing the implementation of this rule assume that if there are no roads to provide access into those designated areas, then they will return to their pre-settle conditions. Nothing could be further from the truth! We will never again have pre-settle conditions in this country. #1 because of past land use (over farming, strip mining, high grading, etc.) #2 because of fire suppression, you cannot have pre-settlement conditions by altering natural occurrences. #3 because of the introduction of exotic diseases and pests into both our terrestrial and aquatic ecosystems (pest which our native species cannot handle), and #4 because of overpopulation, which everyone knows causes a whole host of problems in itself. (Individual, Ellenboro, NC - #A10509.15121)

**495. Public Concern: The Forest Service should recognize that the Wyoming Wilderness Act does not adequately protect the environment and wildlife habitat.**

The Wyoming Wilderness Act protected high altitude habitat and did not garner protection for complete ecosystems and watersheds, or the lower mountain regions that would protect large herds of wintering and migrating elk, deer, and moose. The Bridger-Teton and Shoshone National Forests should protect the wild integrity of the remaining roadless areas in the impending Forest Plan Revision process. (Individual, Jelm, WY - #A27247.20000)

*Environmental Values General – Roadless Areas*

**496. Public Concern: The Forest Service should protect roadless areas.**

**TO PRESERVE THEIR ECOLOGICAL VALUES**

These Areas are roadless because they were not appropriate areas for logging, mining, or grazing, the uneconomical places. The extractors have not gotten there yet, and as a result these areas have become the last vestiges of the pre-settlement American forests. These forests now have far more value than their extractive, consumptive values - values such as biodiversity, watershed protection, ecosystem services such as cleaning up water and air, generating oxygen, making soil, and recreation (including hunting and fishing). (Individual, Cedar Mountain, NC - #A45.50000)

Give no value whatsoever to commercial or economic considerations, only ecological and preservation values should matter. (Individual, No Address - #A25.50000)

The values that the Forest Service should consider as it evaluates and plans for roadless areas are the interests and circumstances of the nation as a whole and the potential for these areas to contribute to the national well being. In this regard three facts seem especially relevant: 1.) The United States has the largest and most useful road system on the face of the earth that has ever existed in human history. 2.) The United States has obliterated 97 percent of its primary forest. 3.) Inventoried roadless areas of National Forests have unusually high potential to exhibit natural characteristics. Since our needs for moving stuff around have been extensively met and our needs for ecological well being have been grievously compromised it is obvious that environmental health should be the overwhelming concern with regard to these lands. (Individual, West Lebanon, NH - #A4836.45100)

Present and future ecological value should be considered when examining roadless areas. Is it pristine? Was it once pristine and could be again, if roadbuilding and logging were ceased? Is the forest otherwise heavily fragmented? How is the water quality? Has erosion from other roads affected water quality elsewhere? Could it happen here? What are noise considerations? Is the area near a wilderness? Can it provide an important buffer to the wilderness and visitors to the wilderness? Is the area important wildlife habitat, especially for rare, threatened or endangered species? Is the area valuable for scientific research? Is the area important to Native American history, culture or religion? How is the view? Is it part of a stunning vista that would be destroyed if it were logged? (Individual, Minneapolis, MN - #A30387.45000)

In evaluating inventoried roadless areas, the Forest Service should consider the nature of the ecosystem in each roadless area. This includes the identification of habitat for threatened and endangered species, the existence of invasive exotics, and other characteristics. Recreational values of the roadless areas and the economic value of recreational activities in those areas should also be considered. The economic value of the timber should be a minor consideration, although timber harvesting to remove invasive species, improve habitat for threatened or endangered species, or to reduce fuel loads should continue to be available as a management tool in the inventoried roadless areas. (Individual, Marietta, GA - #A4827.45000)

#### **TO INCREASE REPRESENTATIVE ECOSYSTEM TYPES**

Roadless areas will increase representation of ecosystem types in protected areas. In the Southern Rockies and throughout the nation, many ecosystems are not adequately represented in our current system of protected areas, which includes public lands such as National Parks, Wilderness Areas, and Research Natural Areas (Scott et al. 2001). For instance, here in the Southern Rockies SREP discovered that roughly 70% of the region's protected area lies above 10,000 feet in elevation, thus capturing mainly high-elevation ecosystems, such as subalpine forests and alpine tundra, as well as hundreds of thousands of acres of bare rock and snowfields. As a result, numerous natural communities are either poorly represented or missing entirely in the current system of protected areas. In contrast, more than 60% of the roadless lands that are in the Southern Rockies lie below 10,000 feet and contains significant amounts of low- and mid- elevation ecosystems that are now well represented in the current system of protected areas. If these roadless areas were protected in the Southern Rockies, 10 of 12 major terrestrial ecosystems (e.g., ponderosa pine forest, mountain shrublands) would have at least 10% of their total area within protected areas. De Velice and Martin (2001) determined that, of the land-cover classes they examined for the U.S. as a whole (a coarser classification than what Shinneman et al. used), all of the western U.S. land cover types would achieve at least 12% representation if roadless areas were protected.

Better representation of all ecosystem types in protected areas means better protection for the myriad species they support. Higher numbers of species are associated with the low- and mid- elevation ecosystems found in roadless areas when compared to high-elevation ecosystem types. For instance, in the Southern Rockies, alpine tundra has roughly 50 associated vertebrate species while lower elevation sagebrush and semi-desert shrublands have around 160 associated vertebrate species. Thus, protecting

roadless areas will also protect more species-rich ecosystems. This could potentially prevent many plant and animal species from becoming imperiled and eventually listed as Threatened and Endangered under the U.S. Endangered Species Act. (Organization, Boulder, CO - #A22130.50510)

### TO PRESERVE BIODIVERSITY

I love our National Forests. I hike in the nearest ones regularly, and look forward to visiting others whenever I can. My favorite activities are hiking, birding, and photography. The roadless areas are very important to me, whether I am able to access them or not. Even if they are too remote for access by day hikes, they play a very important role in conservation of species. As you know, the smaller a piece of land is that is undisturbed, the poorer it gets in species diversity. So for that reason alone, we should keep as much of the forests roadless as we possibly can. (Individual, Reno, NV - #A82.50000)

The most important value to consider in evaluating roadless areas is the fact that these few remnants of our nation's great forests are invaluable as islands of biodiversity from which species might hope to re-colonize the surrounding areas that have been logged or otherwise degraded. Additionally, these areas are of inestimable value as legacy for future generations. These two things alone would justify the need to protect them from further development and environmental degradation and far outweigh any short-term economic benefits that might be derived from their development. These remaining roadless areas represent such a minute fragment of what were once our great National Forests that this must be the overriding consideration in managing these areas. (Individual, Tenakee Springs, AK - #A5083.50000)

Conserving wild forests affords the protection of those areas needed to preserve species and ecosystems that is America's heritage. Extensive scientific literature (Noss and Soule, 1998) has recognized the need to protect large areas of "core reserves"—absolutely protected areas to facilitate the survival and recovery of wide ranging species. By protecting forests, society maintains the biological legacy that supports a diversity of life, including humans, and provides goods and services necessary to sustain a viable economic future. (Organization, Minneapolis, MN - #A28927.50520)

The principal value offered by National Forest roadless areas is as a reservoir of undeveloped land and biodiversity. This is the key value to which others—whether timber extraction or recreation (for example)—are second. With respect to timber extraction, this is simply because roaded public and private lands can grow trees just as well or better than most roadless areas, while providing cheaper access due to existing roads. With respect to recreation, this is likewise because such roaded lands already offer many developed-recreation opportunities. The ecological and hence societal benefits of large tracts of undeveloped land have been amply and scientifically documented; only roadless areas by definition (whether designated Wilderness Areas, Wilderness Study Areas, inventoried roadless areas, etc.) can then provide these benefits to our nation. (Individual, Granite Bay, CA - #A5166.50100)

I would like to make some outlines of recommendations for a heightened awareness, as you proceed with the rule making process decision and choosing the most appropriate alternative with accompanying consequent intentional actions:

Process of examining for roadless areas -->assist in Plan Revision--> RARE III.

Assume that areas now not inventoried roadless areas are not properly classified i.e. reexamine the totality of the system for roadless potential with the new criteria hereupon derived.

An increased weight for a *top priority* for the Value of Biodiversity (VOB) in and of itself.

Priority of *Ecological values* (i.e., including potential for old growth characteristics).

As Humans, the only *really* provable produced biodiversity in terms of *perpetuity* is seen from the perspective of geological-evolutionary spatial-temporal lenses.

Economic value as a consideration only as viewed through a *curtain* of the Value of Biodiversity, i.e., the increase of species as created by clear cutting most probably does not contribute, or is comparable to *evolutionary produced biodiversity and therefore has not provable economic value, for the long term.* (Individual, Ewen, MI - #A17662.45100)

The value of the area in question should be considered in terms of its ability to contribute to or to sustain the biodiversity of the larger area within which the roadless area exists. For example, if the roadless area has been or can be shown to provide the range, protection and habitat needed for sustaining a healthy population of grizzly bears or for that matter, any essential or endangered or even at risk, flora or fauna, large or small, that is either listed as threatened or endangered or even at risk, then by all means, protect that value. Once these types of inherent forest values have been identified and noted, the remaining values are the protection of our own cultural and spiritual values. A place for a native American to obtain the natural objects that are part of their ceremonies and heritage; a place for us to show and teach people about the natural resource values within a roaded area and their importance in maintaining a healthy ecosystem, untrammelled, except by foot or hoof or paddle. (Individual, Olympia, WA - #A28646.45100)

#### **TO PRESERVE THE FOOD CHAIN**

I am scared to death of losing any more forests, because our trees are living organisms placed on this earth for many purposes. Their natural beauty, which brings peace to those of us who walk among them, is the least of the reasons for their existence. As you know, forests are a major part of the ecosystem which provide food and shelter for other plants and the animals in our food chain. When we disrupt the food chain, WE suffer the consequences along with the living organisms we've allowed to die. (Individual, Gainesville, FL - #A222.50000)

#### **TO USE AS MODELS OF ECOSYSTEM MANAGEMENT**

I fully sympathize with the difficulty of the mandate of multiple use. However, I urge that decisions regarding the future management of roadless areas consider primarily **the long-term ramifications to habitat and wildlife**. The 58 million acres in question are a small portion of federally managed lands. I urge the Forest Service to use them as models of ecosystem-friendly management. These are not vague or unrealistic goals. If systematic and scientific investigation demonstrates a road or cut is eroding into a stream, close or improve the road and stop the cut. If a road or cut is fragmenting habitat, take measures to resolve the problem or cease the activity. (Individual, Baton Rouge, LA - #A21876.50100)

#### **TO RESTORE SURROUNDING AREAS**

The Roadless Area Conservation Rule emphasizes ecological sustainability as the first priority for management plans. These ecologically intact areas can serve as nuclei for restoration of ecological functions in the surrounding forest areas. (Organization, Mariposa, CA - #A28552.50100)

#### **TO SET AN EXAMPLE FOR OTHER COUNTRIES**

As a citizen of the U.S.A. trying to stem the tide of tropical forest destruction, I cannot often say that developing countries should follow our example, given that we deforested most of eastern North America and have done a pretty bad job in the west as well. But at least I could use the designation of roadless areas as evidence of our commitment to protecting the environment. If these areas are once again opened up, we will all lose substantial credibility in the battle against deforestation worldwide. As the richest nation in the world, can't we curb some of our greed and leave what is left in wilderness? (Professional Society, Gainesville, FL - #A26736.50400)

### **497. Public Concern: The Forest Service should ensure that protection of roadless areas does not result in increased damage to roaded areas.**

#### **PROTECT ROADED AREAS THROUGH THE NATIONAL FOREST MANAGEMENT ACT**

Protecting these areas should not allow free-license to decimate the remaining roaded areas. The NFMA must protect the remaining resources in a suitable, ecosystem-oriented manner. (Individual, Kemmerer, WY - #A8383.50100)

### **498. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule.**

The best way for roadless areas to be managed for healthy forests is to allow the Roadless Conservation Policy to stand as implemented on January 12, 2001. The Roadless Area Conservation FEIS states on p.

3-5, “Unroaded areas are more likely than roaded areas to support greater ecosystem health, including the diversity of native and desired nonnative plant and animal communities, due to the absence of disturbances caused by roads and accompanying activities. Inventoried roadless areas also conserve native biodiversity, by providing areas where nonnative invasive species are rare, uncommon, or absent.” Also on p. 3-5, “Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land—inventoried roadless areas function as biological strongholds and refuges for many species.” This is particularly true in the Yaak Valley where roadless areas such as Roderick IRA provide some of the highest concentrations of grizzly bears in the Yaak ecosystem. (Individual, Post Falls, ID - #A29936.50500)

#### **BECAUSE WATERSHEDS AND WILD HABITAT EXTEND BEYOND LOCAL ADMINISTRATIVE BOUNDARIES**

Watersheds and wild habitat extend beyond local administrative boundaries. So their maintenance should be guided by larger policy. The National Forest Management Act undervalues wild habitat and watersheds (because they have been steadily cut and consumed over the last 40 years under its process). Local planners should focus the Conservation Rule, not override it. (Individual, Langley, WA - #A17924.13110)

### *Adequacy of Analysis*

#### **499. Public Concern: The Forest Service should make decisions based on science.**

When law-makers and law-shapers begin to use our best available science and technology as their guide, environmental policy and law will inevitably begin to parallel natural law. Again, natural law truly governs the long-term physical well-being of the human race. (Individual, Metropolis, IL - #A3877.50300)

Use science, not politics to make sound decisions. (Individual, Lexington, KY - #A6036.50000)

#### **IN ORDER TO ALLOW ECOSYSTEM MANAGEMENT TO BE THE PRIME OBJECTIVE**

Best available science and wide-ranging public input should be the basis for decisionmaking. Special interest, single-issue groups certainly have a right to be heard but in the end sustainability and ecosystem health should be the prime management objectives. (Individual, Las Vegas, NV - #A28178.14000)

Protecting the forest: The idea of protecting the forest by cutting it down is a way for the timber industry to sound reasonable while getting more land to clearcut. Sound scientific data and methods should be used when protecting against wildfire and disease. Decisions should be made by scientists with the forests’ ecosystems’ best interests in mind. Not by the resource extraction industries or politicians. (Individual, Snohomish, WA - #A30084.15100)

#### **TO ENSURE SUSTAINABILITY**

There is much more to be discovered in the future. The role of local forest management is important, as it always has been, insofar as it is consistent with the recent rulings, emphasizing sustainability, collaboration, and science. These are national lands that we all have an interest in, now and into the future. In order to guarantee sustainability, good science must be used. We know much more now than we did even twenty years ago about forest ecology and how ecological systems work. (Individual, Salt Lake City, UT - #A19069.14500)

#### **500. Public Concern: The Forest Service should adequately evaluate environmental impacts.**

#### **TO AVOID ARBITRARY AND CAPRICIOUS DECISIONMAKING**

The cumulative effect of not considering all relevant factors such as the studies and finding discussed above will lead to a clear error in judgment. According to case law, an agency’s decision would be

arbitrary and capricious “if the agency relied on factors which congress had not intended it to consider, entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency or is so implausible that it could not be ascribed to a difference in view of the product of agency expertise.” (Motor Vehicle Mfrs. v. State Farm Mutual Auto. Ins. Co., 463 U.S. 29, 43 (1983)).

Therefore, an agency’s decision can be found arbitrary and capricious if one or more of the following characterizations are met: (1) the decision ignores material factors, (2) the decision places great weight on irrelevant factors, (3) the decision is contrary to the agency’s explanation for the choice, and (4) the decision is so outrageous that it was a “product of agency expertise.” We encourage the Forest Service to avoid this characterization and adopt a Rulemaking alternative built around a fair evaluation of environmental impacts including mitigation measures and all reasonable and existing motorized roads and trails. (Organization, Helena, MT - #A13226.10141)

### **501. Public Concern: The Forest Service should address the environmental impacts of modern problems on forests.**

#### **ACID RAIN AND GLOBAL WARMING**

Your questions fail to address critical modern day problems, such as the environmental impact of acid rain on our forests. In *Understanding Forests*, John A. Berger maintains: “Forest damage from acid rain costs the world tens of billions of dollars a year. . .” (16-17). Similarly, you refuse to pose any questions about the environmental impact on our forests and oceans brought about by global warming, a phenomenon recently affirmed by scientists around the globe. (Individual, Melvindale, MI - #A30286.50400)

### **502. Public Concern: The Forest Service should recognize the global ramifications of environmental destruction.**

Can’t the people in charge of our country see the damage already done and still worse, being done more quickly than before? Have you seen any scientific predictions of what the pollution and destruction we are doing to this earth is going to produce? It is happening already: The weather—the disasters and droughts; hurricanes, global warming, more tornados, more severe heat waves in record breaking lengths of YEARS and the unusual natural disasters like never EVER before. And all this is killing people and making record numbers of entire nations of people suffer so horribly. All of these things, even just in the last decade, have increased in intensity at an alarming rate. We are destroying our own planet! What about our grandchildren’s futures, or their children’s futures, if any at all? Who should try to stop this insane course we have been on (and continue to increase) in our blindness and denial. We must ALL take responsibility now, today, THIS MINUTE, to stop what more destruction of this earth will do to it, do it forever. We must each and every one of us, stop the money-importance only attitudes and look around. How blind and how stupid we as humans and inhabitants of this planet have been. When will we finally STOP all this? After its completely too late, and we all are dying off due to destruction of our own world? If there are other planets with intelligent life, how must they think of us, as destructive, so ignorantly intent on killing ourselves? (Individual, Ogden, UT - #A27782.50400)

### **503. Public Concern: The Forest Service should protect roadless areas.**

#### **TO ENABLE THE STUDY OF THE LONG-TERM EFFECTS OF TIMBER REMOVAL**

Since more than 90% of the original, virgin forests that once covered the continental US have been cut at least once, I think it unwise to allow additional virgin, roadless forest to be prepared for cutting by allowing roads to be constructed. If anything we need the few remaining large tracts of virgin, roadless forest to be left alone to serve as benchmarks for further scientific study to determine just what long-term effects modern, mechanized timber harvest has had on our forests that have already been cut. (Professional Society, Hixson, TN - #A26223.52200)

**504. Public Concern: The Forest Service should compare the negative impacts of decreased access against the environmental benefits.**

The environmental document must objectively compare the significant negative impacts of closing roads and motorized trails to motorized visitors versus the positive benefits to wildlife habitat, sediment production, water quality, noxious weeds, and fisheries. The real measurable benefits to wildlife habitat, sediment production, water quality, noxious weeds and fisheries from the closing of these travel ways to motorized visitors are all too often relatively small in magnitude and do not justify the significant cumulative impact of the motorized closure on thousands of visitors seeking motorized access and recreation. The document must evaluate how the goal of environmental perfectionism is affecting the human environment. The document must also evaluate the cumulative impact that using environmental perfectionism as a goal for decision-making is having on the human environment. (Organization, Great Falls, MT - #A15315.50000)

**505. Public Concern: The Forest Service should identify underrepresented biological communities.**

The FS needs to identify native biological communities that are poorly represented in current roadless areas and restore roadless areas that could support these rare communities. (Professional Society, Missoula, MT - #A17054.45000)

**506. Public Concern: The Forest Service should evaluate the status of non-National Forest System lands in the coastal rainforests of southeast Alaska and British Columbia.**

**TO DETERMINE WHETHER ADDITIONAL CONSERVATION EFFORTS ON THE TONGASS ARE NEEDED TO PROVIDE A BUFFER FOR REGION-WIDE CUMULATIVE EFFECTS**

The Forest Service should evaluate the status of non-Forest lands in the coastal rainforests of Southeast Alaska and British Columbia, to determine whether additional conservation efforts on the Tongass are warranted, to provide a buffer for region-wide cumulative effects. Private, state, and borough-held lands in Alaska are all subjects to intense logging, with few exceptions. A similar situation appears to exist in British Columbia, where comparatively few lands have been reserved for conservation purposes. It seems unlikely that non-Forest System lands in the region will adequately protect the ecological values of the temperate rainforest. (Permit Holder, Juneau, AK - #A23220.45613)

**507. Public Concern: The Forest Service should provide an analysis of geologic hazard mitigation opportunities that will be lost as a result of roadless area designations.**

**IN WYOMING**

We believe it is important that the following issues must be addressed in the underlying EIS, on a Wyoming-specific scale.

A detailed analysis of geologic hazard mitigation opportunities that will be lost as a result of this proposed action. (State Agency, Cheyenne, WY - #A22609.10135)

**508. Public Concern: The Forest Service should recognize that the concept of biodiversity is a fraud.**

The concept of Biodiversity is a fraud! It ignores Evolution and replaces it with a "static" unchanging environment. As every scientific person worth his "salt" knows, the Earth is dynamic and ever changing. Over 99% of all species that have existed on the face of the Earth are now extinct, and they became extinct before man ever existed! Recent university studies have shown that a healthy environment is reflected in fewer species. (Individual, Sedona, AZ - #A1566.20222)

## Funding

### **509. Public Concern: The Forest Service should use money allocated for roads to fund ecosystem management and protection of wildlife**

Forest Service studies and congressional hearings have established that the Forest Service loses hundreds of millions of dollars every year on its road system. Opening up the roadless areas for additional road building and logging will increase the deficit in the Forest Service budget. From a strictly economic standpoint, the government would be better served to leave these roadless areas intact and use the road money on other Forest Service programs, such as ecosystem management and protection of wildlife. (Individual, Seattle, WA - #A4885.17100)

### **510. Public Concern: The Forest Service should fund the study of landscape ecology, conservation biology, and fire ecology.**

#### **IN AND NEXT TO ROADLESS AREAS**

I want full funding of the evolving study of landscape ecology and conservation biology and fire ecology in and next to the roadless wilderness areas. (Individual, Talent, OR - #A23553.30000)

### **511. Public Concern: The Forest Service should identify the funding required to comply with environmental requirements.**

Identify the funding required to relocate, reconstruct or maintain the existing routes to ensure compliance with existing environmental requirements.

The work required to bring all areas into compliance with environmental regulations will require additional funding. While this proposal does not contain any request for additional funding, it is essential that the funding needs to be identified so that Congress can make better-informed budget decisions and so that the agencies can make better allocations of appropriated funding. This information will also provide a basis on which the agencies can form public-private partnerships to help resolve the issues. (Organization, Salt Lake City, UT - #A12009.17100)

### **512. Public Concern: The Forest Service should require that proponents of road construction bear the costs of damage to affected ecosystems.**

I propose that the proponents of any roads, and cost necessarily associated therewith (including, but not limited to, construction, re-construction, maintenance, signs, etc. and **decommissioning** cost if the road proves ecologically harmful or at such time as the road's proponents no longer desire or have approval for it, as well as also including all the indirect costs of negative environmental impacts produced by or resulting from such roads) bear all such costs in full, with none of those costs ending up being reimbursed and/or born by the peoples of the United States as a whole. These "costs", as the term is used here, must include all direct costs (as well as all indirect costs), such as damage to affected ecosystems resulting from the construction, maintenance, and use by proponents of such roads, e.g. sedimentation into watersheds, air pollution, loss of fragmentation of wildlife habitat, corridors, or habitat connectivity, entry of invasive non-native species, increased fire risks, etc. (Individual, Bishop, CA - #A20954.90130)

### **513. Public Concern: The Forest Service should allow expansion of current access only if a bond is posted sufficient to repair any accompanying damage.**

Existing access should be continued as long as it is in continuous use, retired if it is not, and subject to stringent review of any expansion that could damage the surrounding resources. Expansion of current access should require posting of a reasonable bond sufficient to repair any damage. Any development should be held financially responsible for damage and privately owned land condemned if damage is not remedied. (Individual, Santa Fe, NM - #A25545.40000)

**514. Public Concern: The Forest Service should provide funding to research the effects of habitat degradation.**

More funding is needed to provide for a better understanding of the effects of habitat degradation and to minimize the damages to forest/watershed ecosystems. This research would be linked with the authority to approve timber harvest and road construction and reconstruction in inventoried roadless areas as long as the least adverse impact is selected for a forest harvest plan. Build flexibility into the timber sale plans so managers can be responsive to disease and insect outbreaks. (Individual, Pelican, AK - #A26552.75600)

**515. Public Concern: The Forest Service should provide funding for reclamation projects.**

It has been my experience that there seems to be ample budget and agency motivation to cut more mature and old growth forest. Yet there seems to never be enough money available for some of the pending reclamation projects that are waiting in the wings. Some of these projects are relics of damage done by previous logging and road building. An example in my area is the effects of high altitude logging of Engelmann spruce and sub alpine fir forests. There are a number of areas that were logged at relatively high elevations and have never fully recovered and will not unless large-scale tree planting projects occur in the area. This type of reclamation would add to long-term benefits both locally and globally, yet are not an agency priority. Funding for projects such as this many times has to be acquired through grants from other entities. Meanwhile the Forest Service still spends many thousands of dollars in the NEPA process trying to justify logging and road construction in new areas. Environmental reclamation projects that help restore ecosystem functionality are the wave of the future. I hope the Forest Service eventually realizes this and begins to make this type of project activity the priority over outdated consumptive use projects. (Individual, Penrose, CO - #A21448.17100)

**516. Public Concern: The Forest Service should provide more environmental research funding.**

**AS LONG AS THE RESEARCH IS LINKED TO AUTHORITY TO APPROVE TIMBER HARVEST AND ROAD CONSTRUCTION IN ROADLESS AREAS.**

More funding is needed to provide for a better understanding of the effects of habitat degradation and to minimize the damages to forest/watershed ecosystem. This research would be linked with the authority to approve timber harvest and road construction and reconstruction in inventoried roadless areas as long as the least adverse impact is selected for a forest harvest plan. (Individual, Pelican, AK - #A26552.75600)

**Education**

**517. Public Concern: The Forest Service should educate the public.**

**ABOUT THE ENVIRONMENT AND ECOLOGY**

The best way for the Forest Service to work with a variety of interests such as; state, tribes and local interests is the help to educate them, the public about forest health and wild land. With a strong emphasis on environmental education and ecology. (Individual, No Address - #A17268.15163)

**ABOUT THE COSTS OF ENVIRONMENTAL DEGRADATION**

**We can't have unlimited use of fossil fuels and dependence on potentially enemy, oil producing nations without some losses.** We need to turn up the education of the general public about what those costs may be, which may include a permanent loss of long ago designated forest refuges. "Progress", including increases of fuel use, will eventually cause great harm to almost everything that this world has to offer, both under the soil and over it. Without informing the general global public (including the largest users, The American Public) I believe it may be a losing battle. (Individual, Knoxville, TN - #A19730.15163)

**ABOUT CONSERVATION GOALS**

Achieving the goals of conservation, wildlife protection, and sustainability of natural resources should be the highest priorities. Education of the public regarding these goals is needed. (Individual, Gallatin Gateway, MT - #A19100.50100)

**ABOUT THE NEED TO MAKE PRODUCTIVE USE OF FORESTS**

We appreciate this administration's work toward correcting the problems relating to imported Canadian lumber. But I am sure that most urban Americans do not even realize what has been happening to our timber industry. They do know that new housing costs have sky-rocketed. What they do hear is that loggers, miners, recreationists and cattle are destroying the forests. And they hear FS accused of "killing" endangered species every time they offer a timber sale or grazing lease. The urban public must be told the truth and educated on the real problems facing us and the necessity of using our public lands. We have worked in this type of education on a grassroots level but we do not have the financial resources or government accreditation to be accepted in schools or other public venues. It seems counter-productive that the federal government offers a multitude of funding grants to "conservation" groups, many times as partners with agencies, to provide "educational" materials promoting non-use of national forests, but there are no opportunities for wise-use and "multiple use" groups to present the production/use side of the debate. The FS has the resources and should use them as outreach programs to educate urban America. (Organization, Three Rivers, CA - #A28739.15163)

The FS should continue to manage national forests pursuant to Acts of Congress, which all mandate multiple use. The public must be educated on how our nation's economic independence is directly linked to natural resource production, which is largely derived from public lands. Natural resource production can be, and is being, done in an environmentally sensitive manner. Without natural resource production our nation's economy will suffer which is already evident in the current economic downturn and rising unemployment rate. (Organization, Three Rivers, CA - #A28739.15166)

## Evaluation of Roadless Areas

### Summary

Some people state that when evaluating roadless areas and making decisions, the Forest Service should only consider environmental factors. These respondents assert that national forests cannot accommodate every use and that claims that roadless areas need to be opened for economic reasons are false. Many other suggestions are offered regarding what the Forest Service should consider when evaluating roadless areas. Suggestions include the evaluation of ecosystems, watersheds, native biodiversity, sustainability, habitat requirements, and current conditions. One individual advises the Forest Service to determine how much land is required to assure the preservation, health, and limited growth of species whose population are declining.

### **518. Public Concern: The Forest Service should only consider environmental factors when making decisions.**

#### **BECAUSE NATIONAL FORESTS CANNOT ACCOMMODATE EVERY USE**

The Forest Service needs to adopt a philosophy that protection of the forest comes first, above all other interests. They need to be able to tell some people “NO that is not an appropriate use for the forest”. The National Forest can not accommodate every use, and it shouldn’t. For example—Just because someone comes up with a new type of off-road vehicle the FS has no responsibility to provide a place to use it. (Individual, Merion Station, PA - #A17478.50200)

#### **BECAUSE CLAIMS THAT THESE AREAS NEED TO BE OPENED FOR ECONOMIC REASONS ARE FALSE**

The only “characteristics, environmental values, social and economic considerations, and other factors” that should be considered in this decision are environmental ones. I do not believe there are any economic factors. The claims being made that these areas need to be opened up for economic exploitation are simply false. It is nothing more than the greed of powerful interests trying to disguise itself in the sentimentality of a rural life that does not and never did exist. (Individual, No Address - #A49.50000)

### **519. Public Concern: The Forest Service should evaluate roadless areas with respect to general environmental considerations.**

#### **EVALUATE ECOSYSTEMS**

In evaluating roadless areas eco-systems should be considered. Do the areas fit into protection of an eco-system or are they fragmented? Is the timber of great-value or marginal? What is the highest and best use of the land? Consider the wildlife. (Individual, Missoula, MT - #A113.50100)

At this time deforestation and the slow erosion of natural capital such as the declining species diversity and the loss of intact ecosystems compels us to protect what we have for future generations and especially to prevent predatory financial interests from taking that which belongs to all U.S. citizens and their progeny. The true value of the U.S. forest system is not being measured properly due to a limited economic view that sees our forests in board-feet measurements for timber sales, rather than as a priceless natural resource that provides invaluable services as an intact ecosystem. Those include but are not limited to: filtering pollutants out of the air and water, sequestering carbon to fight climate change, maintaining rainfall and local climate conditions, protecting the habitat of endangered species as mandated by law, providing recreation areas necessary for maintaining a superior quality of life, and finally are an essential part of the scenic beauty that forms the character and backbone of the United States. (Individual, New York, NY - #A395.50100)

The primary concern of the forest service in managing Roadless Areas ought to be protecting ecosystem integrity and creating wildlife corridors. The patchwork logging of the last 90 years has seriously impaired forest ecosystem integrity. A GIS analysis of logging in the Gifford Pinchot National Forest confirms this assertion. It is high time that the Forest Service start taking into account ecosystem function, rather than logging as fast as possible, in its planning. (Individual, Olympia, WA - #A614.50100)

#### **EVALUATE WATERSHEDS**

The local and national values of unburned watersheds and wildlife habitat must be incorporated into the equation. Though the tragedy of losing homes to wildfires is common in the media, the agency must publicly promote the social and economic value of a watershed that is not yet destroyed by a catastrophic forest fire. Until this evaluation is made public, the other concerns are secondary. (Professional Society, Chico, CA - #A29719.51310)

#### **EVALUATE NATIVE BIODIVERSITY**

The USFS must look at a wide array of values when evaluating roadless areas. Native biological diversity values must be taken into consideration. Many of our remaining roadless areas are home to some of the most endangered or rare species in North America. These areas are often headwater and are sensitive to the impacts of roads, such as sedimentation and simplification of channel structure. (Individual, Sandpoint, ID - #A28585.50100)

#### **EVALUATE SUSTAINABILITY**

Sustainability is the primary value to be considered when evaluating inventoried roadless areas. This means that decisions must be based on environmental, economic and social considerations for the local communities. The society of American Forests recently took a position on sustainability. I suggest you use this statement as guidance as you deliberate any action on a roadless directive. If the Forest Service maintains sustainability of the local community, it will also preserve sustainability for the region and the nation. (Business, Colbert, WA - #A17500.50000)

#### **EVALUATE HABITAT REQUIREMENTS**

The Forest Service should consider the wildlife and plant species, their habitat requirements, water quality, air quality, diversity of all species (mammal, plant, bird, fish, reptile, amphibian, etc.), and the interconnected parts of a functioning natural ecosystem in evaluating roadless areas. (Organization, Salt Lake City, UT - #A17170.50000)

#### **EVALUATE ROADLESS AREAS UNDER THE CURRENT CLIMATIC PERIOD AND RANGE OF VARIABILITY**

*Current climatic period – the period of time since establishment of the modern major vegetation types, which typically encompass the late Holocene Epoch including the present, including likely climatic conditions within the planning period. The climatic period is typically centuries to millennia in length, a period of time that is long enough to encompass the variability that species and ecosystems have experienced. Range of variability – the expected range of variation in ecosystem composition, and structure that would be expected under natural disturbance regimes in the current climatic period. These regimes include the type, frequency, severity, and magnitude of disturbance in the absence of fire suppression and extensive commodity extraction.* The above definitions do not meld with what you are presently trying to do in light of future evaluations of “roadless” areas during forest revision plans; in particular, areas that are prone to catastrophic fire. The present \$1.9 billion fire budget the forest service has for 2001 should be testament to failed policy over the last decade. The largest asset that forests provide communities (animals and human), is fresh water—the context of the above two definitions as used in the 2000 forest management plan in relation to roadless are not always conducive to this, either on private or federal administered lands. As used throughout the forest management plan, 219.36 is unworkable with environmental health at the urban/rural interface as demonstrated in the Bitterroot National Forests over the last two fire years. (Individual, Rock Springs, WY - #A15658.50000)

**520. Public Concern: The Forest Service should determine how much land is needed for ecosystem integrity.**

The emphasis needs to be put on exactly how much land is required to assure the preservation, health, and even limited growth of species that are experiencing dwindling numbers or are endangered. Once the proper amount of lands can be set aside to assure the preservation of these species, of which no person or government has the right to destroy, then we can use what other lands we have available more responsibly and effectively to appease purely human concerns. We need to have these plans made by intelligence and the input of the expert opinion of university scientists who have studied and know the best course of action as it relates to what is best for the survival of the forest ecosystem, not its destruction. It is essential that the Forest Service recognizes that its prime concern is the health of the forests, of which each one might be designated differently for use, but all of which should be properly and carefully maintained as complete forest ecosystems. Views that are harmful to the long-term survival of the entire forest should not be seen as real participants in the forest management. (Individual, Lexington, KY - #A1077.15167)

**521. Public Concern: The Forest Service should conduct an inventory of soil, water, and geologic resources.**

This list might include: An inventory of soil, water and geologic resources; an evaluation of their stability and suitability for various activities. (Business, Lewiston, ID - #A7991.50000)

## Management

### Summary

**General Comments** – General comments regarding management vis-à-vis the environment are highly varied. Some comment that the Forest Service should protect roadless areas to encourage energy conservation. Others suggest that certain land types be protected, ranging from the most ecologically important roadless areas to areas not designated as roadless. Writers also suggest management strategies—including connecting protected areas, managing forests through their entire life cycle, and combining the technical advances and experience of forest managers with the best available science to determine appropriate management.

**Ecosystem/Restoration Management** – A number of respondents suggest that the Forest Service should manage lands under an ecosystem management philosophy, but ideas vary on how to carry this out. Suggestions include managing roadless areas in an ecosystem based framework, managing with the principles of conservation biology, allowing natural processes to manage fish and wildlife species, and restoring natural disturbance regimes. Another respondent suggests that roadless areas be retained as scientific control areas. Some add that the Forest Service should engage the public in protecting the environment. One organization advises the Forest Service to focus on restoring degraded areas, while others state that the Agency should ensure the reclamation of developed lands.

**Multiple Use Management** – Some respondents assert that the Roadless Area Conservation Rule does not threaten the tradition of multiple use, while others believe the Rule implies preservation, not conservation, of which this person does not think follows the intent of multiple use management. Another respondent is of the opinion that the multiple use mandate is fulfilled by active management in roaded areas.

A number of respondents state that the Forest Service should allow multiple use and sustained yield management. These writers suggest attaining this objective by allowing the exercise of existing rights, by including recreational and economic uses, and by rotating roadless area

inventories. Some people claim there are already enough protected areas and by allowing any single use preference, such as ‘nonuse,’ to dominate unfair and in violation of the multiple-use mandate.

Other respondents assert that the Forest Service should not manage National Forest System lands under the multiple use philosophy because some uses should be strictly limited, because it is not realistic, and because there are limited areas that should not be jeopardized.

**Other Management Philosophies** – Several respondents provide other suggestions regarding management philosophies. One individual asserts that the Agency should look to our past and recognize that wilderness once lost, cannot be retrieved. Others maintain that Roosevelt’s conservation ethic stressed active management of forest lands, and thus the Roadless Rule stands in fundamental opposition to Roosevelt’s philosophy of conservation. Some also suggest developing policies for protecting and using forest lands which do not entail excluding people, and eliminating biodiversity and ecosystem management as management principles.

**Effects of Activities/Disturbance on the Environment** – A number of respondents comment that the Forest Service should consider the effects of certain activities and disturbances on the environment. Some suggest that fire results in greater environmental impact than other uses such as timber removal and road construction, while others advise the Forest Service to consider forms of damage to forests other than that of fire. Several respondents request that the Forest Service allow certain activities including environmental clean up, the use of all-terrain vehicles for managing habitat, and the commercial use of surplus plant and animal species.

Some respondents advise the Forest Service to consider the positive environmental effects of roads, fire, insects and disease, and downed timber. Some suggest that ecosystems need disturbance to exist and that the absence of timber management and fire control would cause a detrimental volume of additional stream sedimentation. Others suggest that, while these activities may not be beneficial, road construction and off-road vehicles do not endanger the environment.

Other respondents advise the Forest Service to address the negative environmental impacts of resource removal, mechanical forest health treatments, off-road vehicles, roads, mines, drilling, fire, and prescribed fire. According to one individual, erosion from large, stand replacing fires, that often seem to start from prescribed fires are relatively large, compared to similar sized tree removal areas.

## *Management General*

### **522. Public Concern: The Forest Service should protect roadless areas.**

#### **TO ENCOURAGE ENERGY CONSERVATION**

Keeping them roadless keeps heavy equipment from using fossil fuels to build roads, and keeps road users from using fossil fuels on the roads. Retaining roadless areas reduces greenhouse gas emissions . . . from destroying ecosystems through roading and associated uses, and from pulling up coal and oil from the ground and burning them, too. (Individual, Zephyr Cove, NV - #A27169.45100)

Another consideration is energy consumption. The more roads you provide for back road access, the more energy use that will encourage. Our future generations already face enough energy problems without creating more for them. (Individual, Lindsong, KS - #A13426.50000)

**523. Public Concern: The Forest Service should concentrate protection efforts on the most ecologically important roadless areas.**

The FS needs to take seriously the recommendations of environmental experts as far as what roadless areas are most important to protect from species and ecosystem standpoints. Need to make sure that the most important areas are protected, then let some of the other interests have their access if it conflicts with protection of biodiversity. Most other interests are not limited to roadless, wilderness areas like preservation of biodiversity is. Logging, mining, snowmobiles and dirt bikes can all use areas with existing roads. Grizzlies, wolves and cougars need large roadless protected areas to survive. (Individual, Seattle, WA - #A27495.50100)

**524. Public Concern: The Forest Service should protect areas not designated as roadless.**

If roadless areas do become protected, the Forest Service should not then ignore proper management of roaded, multiple-use areas. In other words, do not turn roaded portions of Forest Service lands into tree farms or ATV playgrounds because the "environmentalists" got the unroaded portion. (Individual, No Address - #A29377.50200)

**525. Public Concern: The Forest Service should protect areas adjacent to roadless areas.**

**TO PRESERVE THE ECOLOGICAL VALUE OF THE AREA**

Access to private inholdings and other properties is still guaranteed under the Conservation Rule. In fact, the forest service is required to provide access where demanded by such inholdings. In areas with heavily fragmented ownerships, such as in Chippewa and Superior National Forests, this is actually a flaw, because managers of our STATE forests can demand access to go in and cut wood adjacent to a roadless area. In an ideal world, those state entities would examine such areas and strive to make them contiguous roadless tracts, instead of insisting on harvesting timber there. My guess is if it is adjacent to national roadless areas, it would be of the same ecological value and ought to be preserved. (Individual, Minneapolis, MN - #A30387.40100)

**526. Public Concern: The Forest Service should combine the technical advances and experience of forest managers with the best available science to determine appropriate management.**

**TO MAINTAIN A HEALTHY ECOLOGY IN ROADLESS AREAS**

The technical advances and experiences of those engaged in tree management should be combined with the findings and conclusions of other scientists to determine the most appropriate actions, if any, that are needed to maintain a healthy ecology in the roadless areas. Again, nothing can replace reproducible experimental data and analysis as a guide in making management decisions. An important fact [often ignored by users of ecosystems] is that there is a minimal size and makeup of such a system if it is to be sustainable in the face of unusual climatic events. The degree of human pressure that can cause the ecosystem to live on the edge of survival may lead to sustainability only until a natural disaster occurs. (Individual, Cottonwood, AZ - #A26396.30100)

**527. Public Concern: The Forest Service should manage forests primarily for natural habitats.**

The PRIMARY use of national forests should be preservation of wildlife and natural habitats, as REPUBLICAN President and national forest founder Theodore Roosevelt intended. I would not expect wealthy oil men and oil-rich politicians to understand that, but that's how we who live and work near and in the national forests every day feel. (Individual, Black Hawk, CO - #A25654.50100)

**528. Public Concern: The Forest Service should connect protected areas.**

It is also important to note that to teach effectively and minimize costs, these backcountry areas need to be contiguous or connected in such a way as to provide seamless transitions. Islands of wilderness are not the answer. This has been illustrated in the ongoing White River National Forest planning process where one proposed alternative would designate more acres of Wilderness but provide for developed recreation across the remainder of the forests. Islands of Wilderness do not meet the needs of wilderness, wilderness managers, wilderness users or the flora and fauna inhabiting these areas. (Permit Holder, Golden, CO - #A29630.50520)

**529. Public Concern: The Forest Service should manage forests through their entire life cycle.**

Forests need to be managed through their entire life cycle. Some defined roadless areas have been harvested once or twice, regrew naturally or by replanting, provide habitat for wildlife, and at some point are ready to reharvest. As the forest matures, it happens to be generally roadless for awhile. That does not mean, at all, that it has to become a quasi-wilderness forever, which is the biggest problem with the RAC Rule. (Individual, Minneapolis, MN - #A18054.45100)

**530. Public Concern: The Forest Service should document the risks and impacts of management and non-management.**

It is imperative that the Forest Service requires that the risks and impacts of “doing nothing” be documented as well as an analysis of the risks or impacts of roading or other management activities. In the final decision, the standards for no management on federal forest lands should be as stringent as any standard for management activities. (Association, Augusta, ME - #A13312.30110)

**531. Public Concern: The Forest Service should return environmental policies to their status before the Clinton Administration.**

I am writing to encourage you to rescind the Forest Service’s Roadless Area Conservation Rule as it now stands. This policy is the product of the most extensive federal encroachment in history. It flies in the face of responsible conservation practices. The rule represents an over-balanced approach to environmental extremism, and makes the American people servants to the land instead of stewards over it. As written, it is patently unfair. This kind of bureaucratic regulation is not even constitutional law.

The best way to protect what you term roadless values is to return environmental policies to their status before the Clinton administration hijacked the land from the American people. (Individual, Carthage, MO - #A1102.10130)

***Ecosystem/Restoration Management*****532. Public Concern: The Forest Service should emphasize long-term protection over short-term profits.**

The roots of our government go back to daring foresight, deep intelligence and wisdom. I urge you, at this critical moment, to draw from these roots and raise the standard of our government’s values of our pristine forests to a more long-term, relevant and wise view than that of reaping short-term profits with devastating, lasting effects. We need the Wild Forest Protection Plan as finalized at the beginning of this year, not a policy that facilitates the bull-doing and consumption of these forests—at huge taxpayer expense—for short-term gain and resulting in, at best, after replanting, a Douglas Fir farm destined for future clearcutting and seriously lacking in flora and fauna, instead of the real thing. That is not the way to treat what remains of a national treasure teeming with life and that is not what we should leave behind for future generations. (Individual, Alexandria, VA - #A13348.30520)

**533. Public Concern: The Forest Service should recognize that short-term solutions will not fix long-term problems.**

I have faxed, emailed, and written many letters about the Roadless Area Conservation Rule, ANPR. I am very concerned about short term solutions to long term problems. These short term solutions will have long term effects on our planet, not just for us, but for generations to come. Please, please in your heart do what is right, as a Christian I don't see how God could understand how we are destroying His world . . . for money. (Individual, Brazoria, TX - #A4158.50300)

I feel like our national policies are too short term and should have a longer vision. (Individual, No Address - #A4753.50300)

**534. Public Concern: The Forest Service should manage roadless areas in an ecosystem based framework.**

Local forest planning is essential to management of roadless areas and was given that responsibility by the NRAC Final EIS Rulemaking process. The EIS/policy/rulemaking provided important management exception after exception to guide management of roadless areas (range management, forest health, fire management, public safety, endangered species and wildlife management, travel planning and management, etc.) An expansive national roadless policy detailing management principles—no road building or activities which inherently produce roads for commercial purposes (timber harvesting, some kinds of mineral development)—was developed because roadless areas have great national value and have literally driven broad, national forest policy for decade after decade of conflict and contention. It must be clear now, even to the “new” Forest Service, at this point in time, that protecting these roadless areas is crucial to initiating an ecosystem based framework for managing forest lands. Inherently, forest-by-forest planning fails at this landscape or ecosystem level, thus the need for a wide-ranging roadless area policy. (Organization, Hyrum, UT - #A13496.50100)

The notice proposed five principles on which “protection and management” of roadless values should be based. Yet curiously, not one of the principles mentions protection of the ecological values of roadless areas. The guiding principle of protecting roadless areas must actually be protecting roadless areas. The goal of these principles appears to be to provide a balance between roadless protection and other interests. However, the lack of principles relating to actual protection of roadless areas makes this much less than a balanced approach. Further, these principles are redundant. While protecting certain overriding public interests that may conflict with roadless protection is appropriate in some instances, the roadless rule as promulgated already provides for that balance. (Organization, Boise, ID - #A8240.50000)

**BY MANAGING WITHIN HISTORIC RANGES OF ECOLOGICAL VARIABILITY**

**DESCRIBING VALUES.** AOC supports national forest management policies that permit and encourage: **management** of resources within historical ranges of ecological variability. (Elected Official, Union County, OR - #A8707.50100)

**535. Public Concern: The Forest Service should manage roadless areas using the principles of conservation biology.**

The value of a forest lies in life itself for its own sake. The roadless areas should be managed to conserve plant and animal life in as nearly natural a state as possible. This should be accomplished by prohibiting most human disturbance, and by strictly regulating permitted activities (See Question 7). Some of the dimensions to be considered include: a) species diversity, b) relative species abundance, c) intact functional relationships within and between species, d) genetic variability. In other words, the roadless areas should be managed using the principles of conservation biology. (Individual, Dallas, OR - #A3697.50000)

**536. Public Concern: The Forest Service should allow natural processes to manage fish and wildlife species.**

Focus should be on preserving the existing national forests, not trying to create more. Our government needs to stop trying to play God, by reintroducing wolves, ferrets, or poisoning lakes to rid it of one species of fish just to plant a 'native' species. Let nature take its course, it really doesn't need our help. (Individual, Whitefish, MT - #A8765.30100)

**537. Public Concern: The Forest Service should restore natural disturbance regimes.****TO ALLOW THE BUILDUP OF COARSE WOODY DEBRIS AND LARGE WOODY DEBRIS**

Roadless area protection is needed to protect and restore the integrity of natural disturbance regimes (a hallmark of healthy forests)—small site canopy gaps as well as rare catastrophic disturbance (the spectrum of spatial and temporal scales). A variety of natural processes promote forest regeneration and create canopy openings and early successional habitat; logging is not necessary for these to occur. Coarse woody debris (CWD), large woody debris (LWD), and snags from dead and dying trees are a vital component of healthy forests, essential for sustaining the health of a multitude of terrestrial and aquatic populations and food webs. These materials gradually accumulate as a forest ages and becomes old growth. At present there is a paucity of CWD, LWD, and snags at most sites due to past logging that greatly reduced these inputs by removing the trees. (Individual, Staunton, VA - #A30027.30110)

**TO ALLOW REGENERATION OF THE FOREST FLOOR**

The forests should be protected and managed the same as they have been for centuries. Hasn't less intrusive management worked for wildlife and habitat? Wildfire burns (with contributing fuels) in remote areas do contribute to healthy forests, right? The regeneration of the forest floor after a burn from potash and nitrogen is incredible. (Individual, Hayfield, CO - #A13395.30100)

**538. Public Concern: The Forest Service should focus on restoring degraded areas.**

[Question 9] Focus on questions that can be resolved. Too much time is wasted on conundrums. There is a huge amount of work to be done in roaded areas, restoring and repairing past damage. Instead of an endless debate on whether to build a mile of road in a sensitive area, change the question. Focus on stewardship projects, restoration of damaged habitats, thinning and preventing further extirpation of threatened and endangered species. (Organization, Helena, MT - #A20598.50100)

**539. Public Concern: The Forest Service should ensure the reclamation of developed lands.****THROUGH TECHNOLOGY**

What are the characteristics, environmental values, social and economic considerations and other factors the Forest Service should consider as it evaluates IRAs?. The existence of technology to effectively reclaim the land, should development be determined appropriate. (Organization, Fairfax, VA - #A8036.50000)

**540. Public Concern: The Forest Service should engage the public in protecting the environment.****ENCOURAGE NON-PROFIT ORGANIZATIONS TO SUPPORT THE PRESERVATION OF PRISTINE AREAS**

I expect that if the Forest Service were to preserve some fraction of their lands in a pristine state, it would find that non-profit organizations similar to the National Parks Conservation Association (NPCA) could be set up to support this effort. Why not a National Forest Roadless Area Conservation

Association to help tap into private resources for protection of the ecological values of the forests? (Individual, State College, PA - #A15450.17130)

**ALLOW THE PUBLIC TO SPONSOR/ADOPT AN AREA OF THE FOREST**

How about getting a family, organization, business, etc, person, to sponsor a piece of forest like they do for medians and various areas in and around cities or along stretches of road? I could try to help sponsor the beauty of 20 acres somewhere. What a great idea. (Individual, No Address - #A5360.30200)

**541. Public Concern: The Forest Service should organize public/private partnerships to maintain and protect areas most in need of repair.**

Good stewardship of the forests requires a hands-on approach by the stakeholders of the forests. Much more can be done in organizing public/private partnerships to accomplish the goals of maintaining and protecting those national forest lands that are most in need of repair. These partnerships would also provide a way of educating the public about forest care and respect. Of course those who don't believe that people should be allowed in the forests will try to disrupt these kinds of efforts, but their ideology doesn't allow for good management and protection of the forests. (Individual, Denver, CO - #A26037.30100)

**542. Public Concern: The Forest Service should retain roadless areas as scientific control areas.**

Roadless areas provide a baseline for judging the impacts of more intense land-use activities on multiple-use lands. Because roadless areas in the Southern Rockies and elsewhere provide examples of ecologically healthy landscapes, they provide important opportunities to gauge the health of lands being managed primarily for resource extraction and more intense levels of use. Without roadless areas, there is no reliable ecological baseline to compare the relative health of our more intensely used lands. Thus, roadless areas are an invaluable tool for land and resource managers, helping to ensure the health of all our public lands. This requires substantial amounts of roadless lands in all ecosystem types found on the National Forest, as multiple-use lands occur on all ecosystem types. (Organization, Boulder, CO - #A22130.45100)

If naturally caused forest fires, insect outbreaks, etc. occur, they occur. We are in desperate need of some very large areas that are allowed to live truly naturally, dealing with whatever happens naturally. To assume that present management practices, however carefully devised, are perfect is a serious mistake. In fact, in my opinion, it is a frightening form of intellectual arrogance. I hope we can agree there is much we do not know about forest ecosystems. That is why it is so critically important to leave some very large ones—across the nation—*alone*. Present management practices may be causing harmful effects of which we are utterly unaware at this time. How can we possibly know what the effects of present or future management practices are if we have nothing against which to compare? (Individual, West Swanzey, NH - #A15665.30100)

**GRAVINA, SOUTHEAST ALASKA**

I've suggested Gravina should be retained as a scientific control area from which to compare the already extensively roaded and clear cut regions of SE Alaska. The cumulative impacts of non-USFS lands must be considered as well. There are numerous options for both consumptive and non-consumptive uses of these areas that do not require roads. (Individual, Ketchikan, AK - #A13522.50000)

**543. Public Concern: The Forest Service should recognize that timber interests have marginalized ecological forestry.**

We have been, ostensibly, discussing ecology and conservation for at least thirty years in relationship to management of our National Forests, and of course these concerns were supposedly originally present when Mr. Roosevelt created the USFS a hundred years ago. The problem—especially since the end of WWII—is that the raw financial and political power of the timber industry has marginalized these discussions and any sweeping, meaningful, practically effective implementation of ecological science in

the management of these forests. “Forestry” has been defined by the industry, not ecologists, and only in the past ten years has there even been flirtation with ecological concepts and actualizing them at a management level. (Individual, Williams, OR - #A17130.15122)

## *Multiple Use Management*

### **544. Public Concern: The Forest Service should clarify the meaning of multiple use.**

What is the meaning of Multiple Use? I could ask 10 Agency employees and would get 10 different answers. A myriad of activities occur on National Park managed lands. Yet, National Parks (even with commercial activities) are not considered multiple use lands. Why? Why is the USFS considered multiple use and the NPS is not? Does multiple use mean that logging and mining may occur? If so, lets say so. We continually get requests to implement various projects on NFS managed lands by proponents. Most are money-making opportunities on Federal lands. There is nothing inherently evil about that. However, many of these projects are inconsistent with the long-term goals of the streams and the land. In these instances, time after time, the proponents vehemently argue that their project must be moved forward regardless of impacts because the USFS is a ‘multiple use’ agency. What is the difference between the NPS and the USFS as it relates to ‘multiple use.’ (Individual, Grangeville, ID - #A1578.15161)

### **545. Public Concern: The Forest Service should base multiple use management on local citizen needs.**

To illustrate the importance of decision making at the local level, all stakeholders present for a planning meeting for the Burro Mountains in the Gila National Forest in southern New Mexico stated, “the Burro Mountains need to be managed for multiple use.” In other words, access needs to be provided for all activities in the National Forest System. As such, NMDA [New Mexico Department of Agriculture] requests the FS base national forest management decisions on a rigorous analysis of multiple use needs of the local citizenry. (State Agency, Las Cruces, NM - #A18061.50200)

### **546. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule does not threaten the tradition of multiple use.**

As an Eastern Washington resident, I understand the value of having our National Forests managed for multiple use.

Already the vast majority of National Forests support diverse activities such as grazing, logging, mining, and recreation. The roadless rule does not impact these activities at all and as such does not threaten the tradition of multiple use. (Individual, Ellensburg, WA - #A1895.10110)

### **547. Public Concern: The Forest Service should recognize that maintaining forested areas without roads is an appropriate measure in the context of multiple use management.**

The Roadless Rule is a good example of progressive land management based on science and a recognition of all forest values. The February 2000 issue of Conservation Biology included a special section (9 papers) on “Ecological Effects of Roads.” An article by Trombulak and Frissell concluded: “We reviewed the scientific literature . . . and found support for the general conclusion that they [roads] are associated with negative effects on biotic integrity in both terrestrial and aquatic ecosystems . . . Our review underscores the importance to conservation of avoiding the construction of new roads in roadless or sparsely roaded areas . . . [and] it is critical to retain remaining roadless or near roadless portions of the landscape in their natural state . . .”

Maintaining forested areas without roads is an appropriate measure in the context of multiple-use management. Multiple use of national forests has never implied building roads and authorizing extractive use and high-tech recreation on all areas outside of Wilderness. We, and future generations,

will benefit from national forest landscapes that have not been roaded. (Individual, West Glacier, MT - #A5946.45100)

For the Forest Service to attribute to roadless areas values beyond traditional multiple use values leads to a legal trap that the Forest Service should avoid. In theory, the “release” language in the 1980s Wilderness acts was intended to help solve this problem, it didn’t. Multiple use management certainly includes values that require that some areas not be roaded. The NFMA forest planning process is the mandated, appropriate and adequate way to handle this. (Individual, Spokane, WA - #A17819.50200)

**548. Public Concern: The Forest Service should recognize that preservation is in opposition to multiple use.**

When the term Roadless Area Conservation is claimed by the Forest Service, in my mind it is not conservation; rather they are saying PRESERVATION and I object to that. The whole premise of “protecting” our forests is a false one and is in direct opposition to the Forest Service foundation of multiple use. (Individual, Bellvue, CO - #A13383.50200)

**549. Public Concern: The Forest Service should recognize that roadless area values are attainable through multiple use management of roaded areas.**

I recommend that you carefully and clearly identify those products, services, and conditions of national forest lands that can be provided under responsible multiple-use management and do not require the restrictions inherent in roadless/Wilderness area designation. Many of the benefits claimed for roadless areas in former President Clinton’s speech announcing this initiative, in Forest Service press releases, and in the Forest Service’s background statement in the NOI were fully attainable though the multiple-use management of roaded areas. (Professional Society, Orono, ME - #A17644.50200)

*Allow Multiple Use Management*

**550. Public Concern: The Forest Service should allow multiple use and sustained yield management.**

Multiple-use of our national forests makes healthier forests, healthier local economies, better wildlife habitat, helps our schools and county roads, and makes more recreational opportunities such as huckleberry-picking, photography, and good-panning. The availability of small fast-and-pole and firewood permits are also beneficial to local citizens. (Individual, Stevensville, MT - #A2357.50200)

**BY ALLOWING THE EXERCISE OF EXISTING RIGHTS**

North Dakota Farm Bureau believes the most effective utilization of public lands is the multiple-use concept, including agriculture, mineral development and recreation. Any land management decisions should be site specific at the local level. Existing rights should be allowed, such as water rights, grazing permits, right of access, etc. (Association, Bismarck, ND - #A30187.50200)

**BY INCLUDING RECREATIONAL AND ECONOMIC USES**

We continue to be a strong supporter of the concept of multiple use for public lands within the State of Nevada. These uses include recreational (hiking, camping, bicycling, horse backing, hunting, fishing, cross-country skiing, snow-shoeing and off-road vehicle use), and economic uses such as mining, livestock grazing, timber harvest and guided tours (i.e. snowmobile and off-road vehicle use). (Elected Official, Douglas County, NV - #A22071.50200)

**BY ROTATING ROADLESS AREA INVENTORIES**

The forest is a renewable economic resource. Dynamic natural forces as well as man’s activities have an impact on current forest conditions and are important factors in making management decisions. Harvesting forest products such as timber, forage and wildlife should be managed in a way to provide ongoing multiple use and sustained yield. To accomplish this, it may be necessary to rotate roadless inventories from one section of the forest to another. We believe that the roadless inventory should be

periodically updated in order to keep the database current. Expansion of roadless acreage is not necessary. (Association, Sandy, UT - #A15818.30200)

#### **BECAUSE IT BEST MEETS THE NEEDS OF THE PEOPLE**

Multiple use management will best meet the needs of the public and provide an equal and equitable management plan. We encourage reinstatement of these goals. (Organization, Great Falls, MT - #A17098.50200)

I think this question can largely be answered by recommending that the forest service follow the tenets of multiple use management. These areas are the public's domain, and all the interests of the public should be able to be potentially accommodated. This cannot happen if large chunks of forest are declared "off-limits". (Individual, No Address - #A27249.50200)

#### **BECAUSE THERE ARE ALREADY ENOUGH PROTECTED AREAS**

There are many inventories roadless areas, wilderness study areas, and designated Wilderness areas within our backyard. We value all these areas for their beauty, the wildlife, the solitude, and the peace of mind they bring to us. But enough is enough. There are designated areas where each of us can enjoy our very own "special" values. Montana does not need more designated wilderness. We have participated in volunteer work with the local Forest Service for many years. We have created a feeling of ownership by protecting the environment with erosion control, weed abatement and improved public safety. Multiple use values should be returned to the process. (Organization, Great Falls, MT - #A17098.50200)

The National Forest system contains 192 million acres. Of this, 42 million acres, or 22%, are currently preserved in special designated areas (wilderness or other naturally managed areas) where road building, timber management, and other types of permitted uses are not permitted. The IRAs consist of another 54.3 million acres, or 28% of the lands managed by the Forest Service, of which some acreage (the reader of the decision is hard pressed to determine how many) is going to be recommended for additional wilderness designation. In addition, there is a large inventory of parcels "less than 5,000 acres in size"; depending on the outcome of the Roadless Initiative, these parcels could be withdrawn from multiple use. Thus, at a minimum, 50% of the National Forest lands will be withdrawn from the majority of the users. At the same time, user numbers for National Forest lands increase yearly. Where are all of the users going to go? The decision alludes to the fact that other federal and private lands have future opportunities for the additional users, but then falls short of any sort of evaluation of how this is going to be accomplished or how the public is going to be informed of this new "Don't Use the National Forest" strategy. Such a significant change in policy, more than doubling the amount of land area that will no longer be available for multiple use, deserves more careful consideration than the process employed at this point. (Permit Holder, Mammoth Lakes, CA - #A21901.50200)

#### **BECAUSE ALLOWING ANY SINGLE USE TO DOMINATE THE PUBLIC LANDSCAPE WOULD BE UNFAIR**

The Forest Service should be protecting this land FOR the public, not FROM the public. In its efforts to meet its multiple-use mandate the Forest Service will undoubtedly have to balance the use preferences of a variety of users. Allowing any single use preference, such as "nonuse", to dominate the public landscape would be unfair and in violation of the multiple-use mandate. (Individual, Canyon Lake, TX - #A3666.50200)

#### **AS REQUIRED BY LAW**

We cannot make decisions about resources we have failed to identify. Any modifications to the Roadless Area Conservation Policy must take into consideration the need to access the national forests to provide for Congressionally-mandated multiple uses. (Individual, Laramie, WY - #A949.50200)

The plans must provide for multiple use as provided in The Multiple Use Sustained Yield Act of 1960, taking into account the "coordination of outdoor recreation, range, timber watershed, wildlife and fish, and wilderness". (Individual, Anaheim, CA - #A953.50200)

The management for multiple use works when it's allowed to, when forest professionals are allowed to make their best professional decisions and then implement them. If fuel levels are high, allow for fire wood removal or select timbering, allow for primitive recreation, both motorized and non-motorized, encourage the public to enjoy the solitude that their public lands can afford them. The prescription works when it's allowed to, otherwise the anti-recreation lobby couldn't continue to find millions and millions of acres managed under the multiple use mandate every year that now qualifies for Wilderness designation. (Individual, Los Alamos, NM - #A3720.50200)

**551. Public Concern: The Forest Service should reexamine forest plans to ensure that multiple use requirements are being met.**

It is notable that during the LRMP process the Forest Service noted that a 10% reduction in timber sale outputs would be a significant change that would trigger a revision or amendment. The significant nature of the reduction warrants a reexamination of the forest plans to determine whether the multiple use requirements are still being met, and if not steps should be taken to revise land use allocations to restore multiple use management. (County Attorney, Grant County, OR - #A17667.50200)

**552. Public Concern: The Forest Service should manage national forests for sustainable use.**

I strongly oppose any weakening of the Roadless Area Conservation Rule. I am a passionate supporter of preserving the remaining tracts of unroaded areas. They represent a small portion of the productive forest acreage available to us. We have put vast tracts of the forest into wood products production. If we are any kind of stewards of the land, and if we have any skill and knowledge about achieving sustained yield, we can maintain an adequate flow of material (and jobs) from the huge areas of forest already in commercial use. (Individual, Eugene, OR - #A276.75400)

**BY IMPLEMENTING RESTRICTIONS ON TIMBER REMOVAL METHODS AND PRACTICES**

Unlike most other "tree huggers", I would like to see some of the trees in our forest lands harvested. HOWEVER, I don't want to see roads nor clear-cutting as being a part of that harvest. I feel that:

1. The Forest Service should select the trees that may be harvested;
2. Commercial loggers must pay a fair price on all trees harvested;
3. No roads can be constructed into any part of our National Forests for logging purposes;
4. Loggers will have to do all of the cutting and trimming;
5. Helicopters will have to pick up the logs and remove them from the forest.

Will it be expensive? Yes, it will be for the loggers, but not for the taxpayers. Will it cost the taxpayers anything? No, it should put money into our treasury if loggers pay a good price for our logs. Will it cost consumers more for lumber? Certainly, it may even cause industry to conserve wood products more effectively (wood pallets, for example, are often used once, then tossed). (Individual, Random Lake, WI - #A4620.75400)

*Do Not Allow/Reconsider Multiple Use Management*

**553. Public Concern: The Forest Service should not manage National Forest System lands under the multiple use philosophy.**

Perhaps it is time to reconsider our 19th century economic model based on extraction. Why doesn't the Forest Service lead the way by changing the management approach and the ill-advised Multiple Use concept to one that protects, restores, and celebrates our heritage of wildness? (Individual, Florence, MT - #A7.50000)

**BECAUSE SOME USES SHOULD BE STRICTLY LIMITED**

The idea of multiple use is not really workable when the numbers and demands become mutually exclusive. Perhaps it is time to scrap MUSY in favor of more realistic management policy—one that gives precedence to maintaining the forests' ecological integrity rather than its utility for extraction

industries. Short of scrapping MUSY, the Forest Service should recognize that some uses are much harder on the forest and even other types of uses, and should therefore be more strictly limited. Logging, mining, and drilling obviously destroy forest resources and preclude other uses. Motorized users are not mutually compatible with simultaneous quiet uses; they also harm the forest. These types of uses should be strictly regulated and possibly curtailed. (Individual, Crested Butte, CO - #A21816.50100)

#### **BECAUSE IT IS NOT REALISTIC**

The idea of multiple use management on all public lands is an admirable goal but not a realistic one. (Permit Holder, Rifle, CO - #A29619.50200)

#### **BECAUSE THERE ARE TOO FEW FORESTS LEFT TO JEOPARDIZE THEM ANY FURTHER**

At one time, the mandate of the Forest Service called for “multiple use”: preservation, recreation, logging and mining. At one time, this policy may have made sense. Certainly today, it no longer does. For a variety of interlocking reasons, both economic and environmental, multiple use is no longer the correct way to manage our national forests. Our country has too few forests left to jeopardize them any further. (Individual, Candler, NC - #A160.50200)

We have despoiled way too much of our public lands through the concept of multiple use. This is a polite term for theft cloaked as necessity. (Individual, Harmony, MN - #A43.50200)

### *Other Management Philosophies*

#### **554. Public Concern: The Forest Service should manage roadless areas according to the philosophy of Theodore Roosevelt.**

We need to look at these issues as one of our greatest presidents, Theodore Roosevelt, would have us do. Wilderness lost is wilderness never to be regained. Logical, intelligent land use is an imperative. (Individual, Centre Hall, PA - #A3965.50000)

#### **555. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule opposes the Roosevelt philosophy of conservation.**

Even more ironic was the feeble attempt by President Clinton to claim the conservation mantle of Roosevelt and Gifford Pinchot. Clinton invoked Teddy Roosevelt nine times in his speech announcing this initiative. But this initiative stands in fundamental opposition to Roosevelt’s philosophy of conservation and to his record of accomplishment.

Roosevelt’s conservation ethic was summed up in a speech at Osawatomie, Kansas on August 21, 1910, when he said, “**Conservation means development as much as it does protection**”. And what did he mean by development? His autobiography boasts of the “roads, trail, and telephone lines” that began “to be provided on a large scale” on National Forest lands under his Administration. Roosevelt emphasizes that, once he had Pinchot and professional foresters in charge of the National Forests, they proceeded without delay to “open all the resources of the National Forests to regulated use”. He further points with pride to increasing timber sale income from National Forest lands by more than fourteen-fold in three years.

The Clinton Administration, by way of contrast, boasted of eliminating 2/3 of the timber sale program since taking office, and hoped to make this non-use-non-management philosophy permanent. In point of fact, based on the words and actions of both men, Clinton had an approach to National Forest management that was roughly opposite to that of Roosevelt. Those of us who believe in the philosophy of multiple use are the true philosophical heirs of Teddy Roosevelt. (Organization, Missoula, MT - #A28141.50200)

**556. Public Concern: The Forest Service should develop policies for protecting and using forest lands without excluding people.**

Western governors, congressional leaders, recreation groups, resource businesses, property owners and citizens are working together to support our rural communities, and to advance new ways to protect the environment while simultaneously providing the public with the important natural renewable resources these lands provide. It's time, through your leadership, to advance policies for protecting and using forest environments without excluding people. (Individual, Scotts Valley, CA - #A2876.50200)

**557. Public Concern: The Forest Service should eliminate biodiversity and ecosystem management as management principles.**

Eliminate "biodiversity" as a management concept, goal, or operational principle.

Eliminate "eco-system management" as a management concept, goal, or operational principle.

No more interpreting multiple-use to put people's activities last. (Individual, Greeley, CO - #A28995.50200)

*Effects of Activities/Disturbance on the Environment*

**558. Public Concern: The Forest Service should consider forms of large-scale damage to forests other than that of fire.**

**INCLUDING HUMAN CAUSED DAMAGE**

*Protecting forests from the negative effects of severe wildfires and insect and disease outbreaks.*

How does the Secretary propose to expose the forest to the positive effects of severe wildfires while protecting them from the negative effects of the same? One process usually results in a host of effects and these effects usually show some distribution over whatever range of parameters you choose.

Protecting forests from catastrophic [fire] is fine, but there are other forms of large-scale damage to forests that are not mentioned in this statement, especially those caused by mankind: changes in atmospheric composition (for example introduction of copious quantities of sulfur which leads to acid), demands for access (leading to fragmentation of forest tracts, reduction of water quality, and loss of habitat by the building of roads), and demands that value be measured in dollars only (there are many ways to make money, many ways to obtain energy, many way to build structure, but there is no way to make a forest—to date, people have demonstrated only that they can destroy forests en mass via clearcutting or destroy forests slowly, piece by piece, as we are dong right now with this letter, this discussion, and this entire issue. (Individual, Nederland, CO - #A19016.11130)

**559. Public Concern: The Forest Service should recognize that fire results in greater environmental impact than other uses.**

**TIMBER REMOVAL**

One last thought, doesn't it seem rather hypocritical that the same environmental groups who protest a 40 acre logging job stand silently by, as millions of acres burn, causing air pollution, destroying wildlife, wildlife habitat and with no vegetation soil erodes into steams and rivers. The 40 acres will normally be replanted within a year. In 4 to 5 years there is a new healthy stand. A forest fire, if not enough will sterilize the soil and any regeneration will be a long time coming. (Individual, Olympia, WA - #A11810.50000)

**ROAD AND FIRE LINE CONSTRUCTION**

The huge Yellowstone National Park fire demonstrated that active road building and fire line construction results in much greater stream sedimentation and adverse impacts to aquatic resources than the fire itself. (Individual, Juneau, AK - #A23242.30100)

**560. Public Concern: The Forest Service should recognize that some activities do not endanger the environment.****ROAD CONSTRUCTION**

The mountains are still there, the creeks are still there, wildlife is still there, sagebrush is still there, etc., etc. The premise that roads destroy an area is pure nonsense. They allow all of us to enjoy and access our back yards. (Individual, Ketchum, ID - #A388.50000)

**OFF-ROAD VEHICLES**

All too often it seems we in the ORV community are automatically considered scofflaws and anti-environmental neanderthals simply because we enjoy the natural wonders of our great nation from the seat of a motorized vehicle. From my perspective, this could not be further from the truth. From my childhood days growing up in the backwoods of Maine to my current middle aged radial on the great circle of life, I have always enjoyed the natural wonders of our United States and have tried hard to make sure the impact of my adventures have been minimal. I was taught the basic tenets of the Tread Lightly philosophy by my parents long before the Tread Lightly, Inc. program was organized into the form as it exists today. I and all of the other ORV users I know adhere to these same tenets as we partake in the enjoyment of our public lands. To automatically label us as anti-environmental and/or dangerous to the environment simply because we drive an ORV is to ignore the simple truth. (Individual, Saint Louis, MO - #A629.50000)

**561. Public Concern: The Forest Service should use all-terrain vehicles for managing the habitat of all the forests and grasslands in the United States.**

I suggest that the use of other ALL Terrain Vehicles are cheaper and better to use for managing the habitat of all the forests and grasslands of the U.S.A. All the forests are being deteriorated by wildfires because of negligence of people getting too close that are not responsible for their actions and it will only get worse when there are more roads going to and through them. (Individual, Jamestown, IN - #A10964.30200)

**562. Public Concern: The Forest Service should permit environmental clean-up activities.**

Allow for an environmental cleanup, when there are existing statutory or treaty rights, or when there will be irreparable resources damage, or there are hazardous road conditions, development of Federal Aid Highway projects, or the continuation or renewal of mineral leases on current leased lands. (Tribal Government, Lapwai, ID - #A11821.90110)

**563. Public Concern: The Forest Service should prohibit the collection of animal and plant specimens.**

In order for the process to reach its full environmental and scientific potential human activities within those designated areas should be kept to an absolute minimum.

The following activity shall be expressly prohibited: Collecting animal and/or plant specimens. Permits could be issued for bona fide scientific purposes. (Individual, No Address - #A26840.90000)

**564. Public Concern: The Forest Service should require a permit for destructive sampling of the forest biosystem.**

Non-destructive data-collection should also be allowed, to assess the biodiversity and "health" of the roadless area. Destructive sampling of the forest biosystem should require a permit from the forest service. (Individual, Olympia, WA - #A25533.90110)

**565. Public Concern: The Forest Service should allow the commercial use of surplus plant and animal species.****AS DETERMINED BY MONITORING TEAMS**

Allow exploitation of all surplus plant and animal species, as determined by interdisciplinary roadless areas monitoring teams. (Individual, Cleveland, OH - #A26411.90000)

**Positive Effects****566. Public Concern: The Forest Service should consider the positive environmental effects of activities/disturbance.****ROADS**

I wonder, after a road is built does it not become a natural fire break? The natural grasses and foliage that fill the sides of the road creates feed for wildlife, and mankind has a chance to use the road for pleasure and economic benefit. I'm sure there was some erosion when the road was built but it diminishes with time. By rebuilding and removing the road twice, how much silt and erosion does this cause? Now there will be the concern of erosion after the fire is out. I bet you a Montana T-Bone steak it is a heck of a lot more. (Individual, Kalispell, MT - #A13362.52210)

In my experience as a fire watch for a logging company, all species of wild life travel the logging roads rather than through the brush or rugged terrain. (Individual, Cottage Grove, OR - #A11071.53000)

**FIRE**

Forest fires should not be thought of in a negative way. Forest fires can be compared to sharks in that they both get a bad reputation because the public is not informed on the issue. Fires are a very good thing for the environment and can actually improve conditions in the forests. We as a nation have almost been too good at preventing forest fires because according to the U.S. forest service about 110 million acres of woods are in poor health ("Playing"). Poor health of trees can be contributed to dead trees and the fact that forest floors are cluttered with dead wood and debris that prevent new, healthy trees from sprouting. Trees need sunlight to grow and if the ground is covered with underbrush it is very difficult for new seedlings to develop. Controlled burnings would remove the clutter and the ash would provide nutrients for the next generation of trees. As well, trees that die as a result of a fire will eventually topple over and disintegrate, nourishing the soil and insects. As well, the fire will melt pinecones and release their seeds, which could become the next generation of trees (Hyman). When snow melts in the spring, the water will carry nutrients from dead trees and plants into the surrounding waters, which will be a boost to insects and fish that prey on insects. As a result of the fire cleaning out the forest floor, this will open up space that will allow plants to grow back quickly. (Individual, No Address - #A30364.30310)

Most natural events that might be considered catastrophes actually have beneficial consequences for the long-term health of ecosystems. Fires for instance are necessary to burn-off dead vegetation and germinate the seeds of some species. (Individual, Albuquerque, NM - #A23820.30100)

Federal restrictions on road development on the surface also seem environmentally friendly from a standpoint of specie preservation. But in fact, it could be the opposite. Wildfire threatens the safety of many rare and endangered plant species throughout the national forest system. Without small-scale road development in fire prone areas of the forests, fires could spread quickly with no hope of containing the flames. Intervention is necessary on the part of local forest rangers, and without it many species could perish. Local fire prone areas are well known by the forest rangers, and a federal restriction that prohibits access to these specific areas could endanger many species. (Individual, No Address - #A29623.30200)

### INSECTS AND DISEASE

Much of the managed forests of the sierra cascade region are lacking in wildlife habitat trees (snags) because of the removal of “decadent” trees and management decisions that target dwarf mistletoe and insect infestation. These two processes are integral to the dynamic functioning of natural forests. Dwarf mistletoe “infestation” of stands and individual trees creates irreplaceable habitat for a wide variety of birds according to a study published by Robert Bennetts (The Influence of Dwarf Mistletoe Infestation on Bird Communities in Colorado Ponderosa Pine Forest, Colorado State University, 1991). Dwarf mistletoe traditionally has been viewed as a forest pest because of reductions in timber volume. Bennetts’ data suggest that dwarf mistletoe has a positive influence on abundance and richness of bird communities. An alternative view of dwarf mistletoe is warranted in the context of an ecological disturbance process and its influence on wildlife and forest structure. The ecological role of dwarf mistletoe is certainly not limited to snag recruitment in that it provides nesting and forage habitat for sensitive species as well as their prey base (Pgs. 22-23 Bennetts). The silvicultural goal of thinning trees to improve vigor and reduce mortality needs to be assessed in terms of eliminating opportunity for snag recruitment and other habitat requirements. This is particularly true in designating High Value Habitat Areas such as roadless areas. (Organization, Chico, CA - #A25114.31210)

The agency asserts or implies that natural diseases and insects that may kill trees are automatically harmful to forest health (DEIS 3-109). This not only unreasonably presumes that cutting and removing trees cures or prevents diseases or insects, but also concludes that not logging roadless areas is undesirable. The positive aspects of insect and disease outbreaks are omitted from the discussion. Ignored are such beneficial affects as resultant increases in CWD and habitat/niche complexity, thinning of overstocked stands, desirable alterations in stand species diversity and composition, creation or facilitation of early successional habitat, and greater age class diversity. (Individual, Staunton, VA - #A29325.30100)

A common example from Virginia of the agency’s improper presumptions as regards “forest health” underscores the need for tightened proscriptions and improved analysis. It is often simply assumed that widespread gypsy moth mortality will be severe in the long-term (GWNF Panhandle timber sale EA-3). However, this is not consistent with information in the tiered-to GWNF FEIS. The agency found that they cannot predict which stands will be damaged severely by gypsy moths (GWNF FEIS at 3-49). And the agency found that silvicultural practices will not control gypsy moth populations. See FEIS, Response at I-404. The agency also found that most of the oaks are not being destroyed in gypsy moth impacted areas. See FEIS, Response at I-396-397. Also ignored is the recent substantiated collapse of gypsy moth populations (see, e.g., GW-JNFs 1997 and 1998 Monitoring Report at page 84). Importantly, it has been established that a reduction in the proportion of oaks resulting from insects or other natural factors is beneficial as it reduces the subsequent susceptibility of the sites to gypsy moths. As regards gypsy moth or other insect and disease impacts, the affects and substantial benefits to forest health from not logging have not been fully and fairly considered. Scientific information on this relevant factor comes from the agency’s own research scientists. (Individual, Staunton, VA - #A29325.31200)

### DOWNED TIMBER

Bark beetle infestations are as natural to the forests as the trees themselves. Given that old growth is most susceptible to attack, it is important to remember large down wood benefits wildlife and helps prevent catastrophic wildfires by holding large quantities of water on the forest floor (See enclosure referenced above). (Individual, Penn Valley, CA - #A12007.31200)

Healthy coniferous forests are a mix of early, mid and late seral live trees up to 500-600 years of age. Included are shrubs and grasses along with many dead and dying trees. The most important factor for wildlife is a reliable, year-around, food source. Shelter and unfragmented habitats are next. Actual forest health hinges on the number of large softwoods present, such as snags and large down logs. Large down logs are essential to forest health, sometimes called the “foundation of the ecosystem.” They hold massive amounts of water on the forest floor, enrich soils and support myriad wildlife species. Remembering that the cellular structure of large dead woody material can hold up to three times its dry

weight in water is important because it is this kind of wood that helps maintain dampish and cool forest floors. These wet, fire resistant microclimates are further enhanced by the cooling effects of natural forest shading as measured through canopy closure. The key points are that as summer begins, a completely saturated tree branch 2 inch in diameter has only a four-day timelag between wet and air-dry while a 30-inch log has a 180-day timelag. The major problem here, is logging removes the larger wood that would ordinarily grow old and die. Thus, logging interrupts the forests' natural resistance to catastrophic wildfires in several ways: 1) the cooling effects of uncut forest canopies (shading) are lost; 2) moisture 'reservoirs' or the 'holding-tank' qualities inherent to large down wood is lost over the short and long term; and 3) the logged over areas are typically knee deep with small limbs and other discarded logging slash. This highly flammable material dries quickly in the increased sunlight caused by the logging. Worse, more small diameter fine fuels sprout rapidly and grow up among the dry slash. (Individual, Penn Valley, CA - #A12007.60000)

**567. Public Concern: The Forest Service should assess the volume of additional stream sedimentation that will occur because of the absence of timber management and fire control.**

**ASSESS THE DAMAGE THIS WILL CAUSE TO THREATENED AND ENDANGERED SPECIES**

Since logging will be banned or nearly banned from this 50 million acres, built up fuels will make the forest susceptible to devastating wildfires. So the first question for the EIS should be, how much particulate will be released into the atmosphere from these fires? How much CO<sub>2</sub>? When land is logged, the riparian zones can be segregated out and left alone. Wildfires have no such discrimination. How much damage will this initiative cause to riparian zones from the inevitable, uncontrolled wildfires? Many of us have seen the spectacular stream sedimentation that can occur after wildfire, such as the mud flows currently occurring in the Bitterroot. So we would like an assessment of the volume of additional stream sedimentation that will occur because of the absence of timber management and fire control. We want to see an assessment of the damage this will cause to threatened and endangered species, particularly salmon and bull trout. We want to see an accounting for effects such as the Tanner Gulch fire in Oregon, the consequences of which wiped out salmon in that drainage. (Organization, Missoula, MT - #A28141.50000)

**568. Public Concern: The Forest Service should allow stewardship timber removal.**

**TO INCREASE THE ABUNDANCE OF DEAD WOOD ON FOREST FLOORS**

Road construction or reconstruction is unnecessary for the management of healthy forests in roadless areas. Where healthy, native forests persist, natural fire outbreaks and windstorms are natural disturbances to which the forest is well adapted. In fact, these processes are important for the maintenance of biocomplexity in forested landscapes. Where logging has already occurred in roadless areas, or inventoried roadless area where road construction is permitted by management prescriptions, some stewardship logging will be required to alleviate the overcrowding and homogenous characteristics of biological simple, even-aged managed forests. Logging for stewardship logging. Since dead woody debris is a vital component of forest ecosystems, is often lacking in managed forests (due to 'salvage' operations), a further benefit of stewardship logging would be to increase the abundance of dead wood on forest floors. (Individual, Seattle, WA - #A29812.30100)

**569. Public Concern: The Forest Service should consider that some ecosystems and threatened species need disturbance and roadways to exist.**

I think that by trying to protect everything with blanket laws, more damage will be done to ecosystems in the long run. There are certain ecosystems and threatened species that need disturbance and roadways to exist. I would hate to see policies swing to such an extreme that we endanger more ecosystems. (Individual, Gulliver, MI - #A8362.30000)

## Negative Effects

### 570. Public Concern: The Forest Service should address the negative environmental impacts of activities/disturbance.

#### RESOURCE USE

Resource extraction proposals threaten to undermine ecosystem health. Presently the Chugach Alaska Corporation is pursuing two major projects that stand to compromise the health of the Delta—the road to their timber inholdings in the Bering Coal Fields and plans to explore oil and gas with Cassandra Energy Corporation in the Katalla region. Both projects will have substantial long-term impacts, especially a road system that would incur more access to fish, wildlife and habitat in the wild eastern part of the Delta wetlands. (Organization, Anchorage, AK - #A23038.50100)

Local citizens who reside close to National forest lands have long been influential in supporting extractive uses of Federal lands because of the local economic benefits (in the form of jobs) resulting from such uses. Historically the environmental consequences of such uses were often inadequately considered or ignored outright. (Individual, Columbus, OH - #A41.15111)

#### MECHANICAL FOREST HEALTH TREATMENTS

DellaSala and Frost document the best available science that determines that even when they are carefully conducted, mechanical thinning treatments can result in numerous adverse environmental impacts, including:

Soil damage through increased erosion, compaction, and loss of duff/litter layer (Harvey et al. 1994, Meurisse and Geist 1994).

Increased tree mortality of residual/retained trees due to pathogens and mechanical damage to boles and roots (Hagle and Schmitz 1993, Filip 1994).

Increased sediment and siltation that is harmful to fish habitat and other aquatic species (Beschta 1978, Grant and Wolff 1991).

Increased levels of fine fuels and short-term fire hazard (Fahnestock 1968, Weatherspoon 1996, Wilson and Dell 1971, Huff et al. 1995).

Dependence on roads, which result in numerous long-term adverse effects (Henjum et al. 1994, Megahan et al. 1994).

Reduced habitat quality for sensitive, rare, threatened and endangered species associated with cool, moist microsites or closed canopy forests (FEMAT 1993, Thomas et al. 1993).

Given the potential for serious adverse impacts from mechanical thinning treatments in addition to the adverse effects of roads, such treatments should be restricted to previously roaded areas that are also the sites most degraded and in need of restoration. It just makes no sense to build roads to facilitate road-dependent fuels treatments in the name of “conservation,” “restoration,” or “protection.” (Organization, Eugene, OR - #A21798.50000)

#### OFF-ROAD VEHICLES AND LOGGING EQUIPMENT

Areas adjacent to roads also tend to receive more off-road use (camping, firewood gathering) which in heavily used areas can compact soil or damage root systems causing physiological stress. Chemical and road salt can also damage trees. In dry forests with lots of traffic and dirt roads, excessive dust can also stress trees and other vegetation. Soil compaction decreases water absorption and can damage roots of grasses, forbs, shrubs and trees. Off-road vehicles, or heavy logging equipment use, during wet conditions is especially damaging and compaction and loss of soil structure can occur with a single vehicle. (Individual, Las Vegas, NV - #A5694.30100)

#### ROADS AND MINES

I have seen the beauty, the diversity of plant life and the wonder of the animal life in these areas. I have also seen the damage and destruction caused by roads (intended or not) and by mines (often created by a few individuals). The destruction is not just to the immediate area, but surrounding areas as it affects

water in the area—both its purity and the way it flows. It affects the plants destroying many and often allowing non-native plants to get a foot hold. It affects the animals by creating artificial separations of the lands and always the danger of maiming and death by being hit by vehicles and also by poisoning the soil and water that provides food and water for the animals. (Individual, Fillmore, UT - #A7847.30100)

#### DRILLING

Considering the continued leaching of oil from the Katalla fields into Delta waters, no doubt leaving toxic impacts that will only be exacerbated by proposals of renewed drilling and heavy logging in the Delta's uplands, this plan should be declined on the basis of impacts to the adjacent public lands. It is ACE's understanding that the Forest Service has never taken an inventory of "orphan" wells at Katalla, much less tested for the presence of toxins in anadromous streams in the area (conversations with Forest Service staff). (Organization, Anchorage, AK - #A23038.51300)

#### EFFECTS OF ROAD BUILDING ON AREAS ADJACENT TO ROADLESS AREAS

The Forest Service should consider the natural resources adjacent to their roadless areas and how road building might adversely impact them—i.e. protecting salmon spawning reaches from road accidents (tanker spills) and weather phenomena such as floods and fires. It should also consider the steepness of terrain—and in the case of a roaded system already underway to facilitate logging, which despite their best science in the planning process, begins to fail (landslide). (Individual, Craig, AK - #A778.50000)

#### FIRE

In **THE BIG BURN, The Northwest's Great Forest Fire of 1910** an account based on letters, newspaper accounts of the day and actual photographs, by Don Miller and Stan Cohen (Library of Congress catalog card no. 78-51507, ISBN 0-933126-04-2) there is this first hand account in a letter:

*"Men who quenched their thirst from small streams immediately became deathly sick. The clear, pure water running through miles of ashes had become a strong, alkaline solution, polluted by dead fish, killed by the lye".* (pg. 18)

History has probably repeated that many times. In the 1992 the Tanner Gulch Fire in northeastern Oregon, a sluice-out in the upper tributary of the Grande Ronde River resulted in total fish kill for 36 miles downstream in this prime salmon spawning river.

Fire does not protect watersheds, and much of the road destruction (called obliteration) puts tons of silt into streams, both destructive to fisheries and water quality. Modern silviculture can protect watersheds by reducing fire intensity, provide money, machines and expertise to maintain roads and thus reduce the potential for culvert failures, timber for jobs and the local and national economy. (Business, Kalispell, MT - #A29034.30300)

Some of these environmentalists are concerned about the "protection" from erosion from these areas, as well as from road in the forest. From 39 years of flying the Helena National Forest and its surroundings, I can tell you that erosion from our large stand replacing fires, including the let-burn fires advocated by environmental groups, is comparatively like a dump truck load compared to a shovelful of erosion from a similar sized harvest areas. (Individual, East Helena, MT - #A20422.15121)

Years of federal mismanagement to appease environmental interests (mainly, refusing to cut or clear any trees at all) has left the national forests in a state where overcrowded and dead and dying trees have created a disastrous and precarious situation. Trees and debris have created fuel ladders that threaten even healthy trees (that is, an older, healthy forest can withstand and survive a fire if the fire merely clears low-lying brush and grasses but leaves the crowns of larger trees intact.) But the same is not true when dead and dying trees are not cleared. Fire that would normally stay close to the ground can "climb" up these trees and reach the crowns of healthy trees, consuming them. Second, fires that burn too hot can leave land barren by destroying the organic materials necessary for forest regeneration. Finally, when the fuel loads are too high, fires are hard or impossible to control. These fires don't just burn out they rage so hot and so large that they can leap across vast expanses of land and burn whole landscapes. For all the direct costs of such fires, (lost forests, evacuated communities, lost houses,) there is a tremendous cost on our environment. Burning trees release tremendous amounts of toxins and

particulate matter into the air, and the smoke and quality of communities hundreds of miles away. The fires destroy habitat of wildlife, including the habitats of threatened and endangered species. Forest fires can create unstable soil conditions, leading to mudslides and other sediment runoff that affect our streams and rivers, and, ultimately the coast. (Individual, West Point, UT - #A5415.30430)

### **PRESCRIBED FIRE**

Prescribed Natural Fires—Good or Bad?

Environmentalists within and outside of the Forest Service are intensifying their efforts to increase the amounts of prescribed natural fire on public lands.

Environmental groups believe that fires started by lightning should be allowed to burn. Present policy permits this wilderness areas, national parks, and other areas including a large portion of the Elkhorn Mountains included in such categories as Wildlife Management Areas.

Experience over the past twelve years has shown that this “let burn policy” is a disaster for the environment, for receptionists, and for the general public.

The Canyon Creek Fire northwest of Lincoln in 1988, burned 246,000 acres, including 40,574 acres of private land, and 9,166 acres of state land. Pasture land, power and telephone lines, fence lines and some outbuildings were destroyed. The Forest Service disclaimed any responsibility, and it was left to Congress to reimburse the private owners for their losses. This same scenario occurred in Yellowstone Park in 1988, and has been replayed in many other areas since. As more time passes, the public memory of these destructive fires fades, and re-introduction of these policies becomes more easily accepted.

The environmentalists want to commit even more of our dwindling outdoors to additional acreage to these let-burn areas. Unfortunately, wildfires have a nasty habit of straying outside the boundaries prescribed for them by the Forest Service. If you have a home in the woods, how would you feel if one of these fires refused to stay inside the Forest Service boundary and burned your buildings and property? You could also expect the federal agency to disclaim any liability for your losses.

Contrary to what the Forest Service would like you to believe, the effects of uncontrolled wildfires on the natural environment are not entirely beneficial. Erosion associated with these super hot fires is unparalleled with other means of eliminating these excess fuels. Organic material which would aid in regrowth of new forests is mostly destroyed, and the ashes blown away by the wind. The carnage of small animals burned in these fires is beyond belief. And of course, huge wildfires certainly contribute their fair share of carbon dioxide and other pollutants to the greenhouse effect and global warming. (Individual, East Helena, MT - #A20422.30400)

## **Water Quality**

### **Summary**

**General Comments** – A number of respondents comment on water quality. People ask the Forest Service to protect roadless areas in order to protect water quality, to protect against flooding and landslides, and to act as biological defenses against pollution. Some comment particularly that roaded access be maintained to water resources. Some respondents assert that access to water sources is necessary for food resources or to protect the sources from sedimentation. Others state that road access should not be closed because roads and trails can be hydrologically disconnected from streams. Others comment on the effects of wilderness designations and timber removal practices on water quality. One individual suggests that good logging practices can ensure good water quality. On the other hand, some suggest that further land protections, such as roadless or wilderness designations or buffer zones, should be considered by the Forest Service to protect water quality.

**Watershed Health** – A number of respondents comment on watershed health. Some suggest that the Forest Service should adequately address watershed protection and ask that the effects of certain activities, such as road construction and timber removal, also be addressed. Others

request that the Forest Service protect roadless areas to preserve watershed health and to provide for irrigation. One individual asks that the Forest Service assess watershed health from a ridgetop-to-ridgetop perspective in order for “aquatic and vegetative values [to] be applied in a balanced manner.” Others comment that land designations may have a negative impact on watershed management access. Some state, further, that seems to be no inherent watershed benefit associated with roadless conservation.

**Water Quantity** – Respondents offer a variety of different comments on water quantity. Some comment that the Forest Service should increase logging to increase water quantity and state that roadless designations would “limit treatment to increase water production in the future.” Others assert that increased logging will not increase water quantity. These respondents believe that undue timber removal is detrimental to the environment, with no redeeming benefits.

### *Water Quality General*

#### **571. Public Concern: The Forest Service should protect roadless areas.**

##### **TO PROTECT WATER QUALITY**

If we do not pass this Rule, we will be destroying Water quality—for drinking and for swimming and for wildlife . . . etc. If we log the forests, we have less clean water, and we destroy living area and water for (rarer everyday) wildlife. There are a million other reasons for not destroying the forests. I think this (water and wildlife) is the most crucial. (Individual, Austin, TX - #A21704.51340)

##### **TO PROTECT AGAINST FLOODING AND LANDSLIDES**

These unlogged and unroaded areas protect private property from landslides and flood damage. (Individual, Santa Monica, CA - #A1715.45000)

Millions of dollars in damages can be caused by severe flooding. Roadless and unlogged watersheds could help to mitigate the severity of the floods and thus save millions of dollars and a lot of human suffering. This may be especially important if we experience climate change. (Individual, Las Vegas, NV - #A5694.51330)

##### **TO PROVIDE BASELINE AQUATIC DATA**

I am a professional aquatic ecologist, involved in a quantitative assessment of all the rivers and streams in the 12 conterminous western states. Preliminary results indicate that most western waters are impaired and that few catchments or reaches remain that can serve for determining reference conditions against which to compare the others. We often must use historical data. Similar conclusions have been reached in qualitative assessments by federal ecologists and independent scientists. Therefore, based on the best available science, it seems foolish to continue to destroy forests for short term, small scale economic gains to a few in the face of long term and broad scale ecological deterioration with impacts on many current and future citizens. (Individual, Corvallis, OR - #A7998.50300)

##### **TO ACT AS BIOLOGICAL DEFENSES AGAINST POLLUTION**

I believe that full and immediate protection for all roadless areas is important because it reduces human impacts on vital ecological areas and protects our drinking water sources from the risks associated with human contact. There are risks now that we did not know about fifteen years ago, like cryptosporidium, and although treatment plants are highly efficient, we know they cannot remove everything. With the continuing growth in Colorado, the risks to our drinking water are only going to increase unless we have the vision now to protect our water sources. (Individual, Longmont, CO - #A7167.51342)

**572. Public Concern: The Forest Service should adequately assess the true value of water on National Forest System lands.**

An assessment of the marginal value of water on National Forest lands is more than \$3.7 billion per year. This does not include the value of maintaining fish species, many other recreation values, nor the savings to municipalities that have reduced filtration costs because water from National Forests is so clean. It also does not account for the aesthetic rewards to visitors of a day spent by a cold, clear stream. (Organization, Missoula, MT - #A21359.51000)

**573. Public Concern: The Forest Service should recognize that water is necessary for food resources.**

What do these “enviros” eat? Grass? Worms? I guess they don’t eat regular meat because they don’t want the farmers to have water for crops that feed the beef, hogs, and chickens; also, there goes the fruit trees and the bread for the table . . . and what about the displaced MINORITY workers from Mexico? (Individual, Mazama, WA - #A757.51310)

Our Wenatchee Valley is the apple Capitol of the World. All of the irrigation water for this multi-billion dollar industry comes out of Wilderness and roadless Areas. Our local economy depends on these naturally functioning wild forest watersheds. The Wenatchee River Watershed watered by the above named Roadless Areas is one of the few remaining unharmed septums where wild salmon spawn. The White River, whose sole watershed is Wilderness and roadless area, produces half the wild Sockeye Salmon in the Pacific Northwest. (Individual, Peshastin, WA - #A22973.51300)

**574. Public Concern: The Forest Service should address the effects of wilderness designation on water quality.**

The enclosed letter that accompanied the 3 page EPA letter included starts with general comments, under which is 1. Water quality. The following paragraph is taken from page 1 of the enclosure. “The 1700 watersheds of the National Forests provide the preponderance of high quality water supplies for the western states, and many eastern areas as well. Undisturbed forest areas are vitally important in maintaining adequate oxygen and nutrient balances in aquatic systems, and also provide pristine streams of low natural turbidity for the enhancement of aquatic life. EPA is concerned that supplies of high quality water be available throughout the Nation. Our responsibilities under the Federal Water Pollution Control Act Amendments of 1972 further stress the goal that the Nation’s waters be available for the full range of **beneficial uses**, including recreation and the maintenance and enhancement of all forms of aquatic life.” (Emphasis added) On page 2 of the enclosure letter EPA also had the following concerns. “All evaluations of areas that are qualified under the Wilderness Act of 1964 should be conducted with full regard to the potential impacts on water quality. The draft environmental statement for the Roadless and Undeveloped areas contain severe shortcomings, in these areas, and we feel there exists the potential for extensive water quality degradation if Roadless Areas are not allowed the benefit of more detailed study prior to selection as candidates for the Wilderness System. (Organization, Coeur d’Alene, ID - #A13314.51340)

**575. Public Concern: The Forest Service should allow roaded access to water resources.****TO PROTECT WATER RESOURCES FROM NATURALLY OCCURRING SEDIMENTATION**

While roads may and do contribute to sedimentation of aquatic resources, design can minimize and even eliminate this concern. Roads can also allow access to water resources that require protection from naturally-occurring forms of sedimentation, and from catastrophic sedimentation sources such as fire and landslides. (Individual, Tendoy, ID - #A27508.30200)

**576. Public Concern: The Forest Service should not use the risk of sedimentation as justification for motorized recreation and access closures.**

**BECAUSE ROADS AND TRAILS CAN EASILY BE HYDROLOGICALLY DISCONNECTED FROM STREAMS**

The Forest Service Stream Systems Technology Center has found, in a paper published in the July 2000 issue of Stream Notes, that roads and trails can easily be hydrologically disconnected from streams. Therefore, the sedimentation concerns can be easily mitigated and must not be used as a reason to justify motorized recreation and access closures except in significant cases that cannot be adequately mitigated. (Organization, Helena, MT - #A13226.51340)

**577. Public Concern: The Forest Service should recognize that good timber removal practices can ensure good water quality.**

Water quality: good logging practices can ensure good water quality. Large wildfires tend to follow drainages and can lead to catastrophic destruction of water quality. (Individual, McCall, ID - #A29305.51000)

**578. Public Concern: The Forest Service should use buffer zones to protect water quality.**

The use of forests as watersheds should be elevated in importance. Logging, when done, should be accompanied by a large deposit to compensate and clean-up streams that silt-up after logging. Buffers should be sufficiently wide to guarantee no increase in water temperature from the loss of shade, as well as to guarantee no silting after the first heavy rain. (Individual, Olympia, WA - #A441.51300)

**579. Public Concern: The Forest Service should explain the reason grazing and timber removal are believed to pollute water more than wild fire.**

I read in the local newspaper that the runoff from the burned areas were polluting the streams and required the removal of endangered Gila trout. This occurred while logging and grazing are being restricted because they pollute. Why is pollution from forest fires good while any other use of the forest that may result in pollution bad? (Individual, Silver City, NM - #A1139.30100)

### *Watershed Health*

**580. Public Concern: The Forest Service should adequately address watershed protection.**

I find it strange that you ask no questions on the issue of watershed protection, which the earlier Congressional records clearly addressed. As late as 1990, scientists were still discussing the numerous benefits from our old growth ecosystems on America's soils and waterways. For example, Time Magazine observed, "The ancient growth acts as a giant filtration system, preventing run off of water and soil that would swell streams and rivers and threaten fish spawning areas and water quality with excessive sedimentation" (n. p., June, 25, 1990). (Individual, Melvindale, MI - #A30286.51300)

**AS MANDATED BY THE ORGANIC ACT**

As provided by the Roadless Rule, the appropriate role for local forest planning on National Forests is to provide Watershed Protection (Organic Act of 1897) [It is] THE SINGLE MOST IMPORTANT CALLING OF THE US FOREST SERVICE. (Individual, No Address - #A3079.20204)

**581. Public Concern: The Forest Service should assess watershed health from a ridgetop-to-ridgetop perspective.**

Aquatic and vegetative values must be applied in a balanced manner. The health of forest watersheds and ecosystems must be assessed and treated from a "ridgetop to ridgetop" perspective. The "ridgetop to ridgetop" perspective should apply to a forest's overall health status and any necessary restoration.

Inventoried roadless area creation should not interfere with the restoration of watershed or ecosystem health. (Organization, Moscow, ID - #A15318.50000)

**582. Public Concern: The Forest Service should address the effects of certain activities on watersheds.**

**ROADS**

Environmental characteristics that should have the highest level of attention when evaluating roadless areas should be related to watershed areas and possible erosion that could occur if a road is developed or not maintained. If roads do exist in sensitive areas, careful consideration should be given to either improving those roads or alleviate the negative environmental impacts and or to remove the road and relocate it elsewhere if necessary. (Business, Haslett, MI - #A4861.50000)

Roads interfere with the movement of organisms and energy across the landscape. One of the most severe impacts is to riparian areas: Culverts and roadfills bisect stream corridors, isolating communities of fish, amphibians and mammals, they block storm flows, create dam-break floods, and prevent the movement of wood debris. These impacts are huge and we have way too many roads already. Let us keep some areas intact. The Forest Service cannot keep up with the maintenance and abandonment of the roads it already has, why build more? (Individual, Olympia, WA - #A510.51000)

Roads often have devastating impacts on water quality and fish habitat by increasing landslides, erosion, and siltation of streams. Roads also fragment forests and degrade or eliminate habitat for species that depend on remote landscapes, such as grizzly bears, wolves, and other large, wide-ranging predators (Trombulak and Frissel 2000). The habitat fragmentation, erosion, and sediment transport associated with roads is a major threat to the integrity of our forest ecosystems. The impacts on watersheds of "pulse" events created by wildfire and naturally occurring erosion are very limited in duration and are the very conditions with which aquatic organisms evolved. Forest road networks, in contrast, are a chronic source of sediment pollution to the watersheds. They also cause, along with all the forest canopy openings created by logging, high peak flow events from spring runoff and rain-on-snow events that destabilize the streambeds and streambanks, fill pool habitat with bedload sediments, and increase fine sediment input - all further damaging the aquatic environment. (Organization, Missoula, MT - #A613.54000)

**SELECTIVE TIMBER REMOVAL**

This rapacious, greedy appetite must be stopped. We know that it is in loggers interest to cut the best trees in a given watershed and move on. They take the largest trees that are easiest to reach to maximize profits. Unfortunately, the harmful effects to the watersheds are spread throughout a much broader area than raw numbers would indicate. The best trees are located in lower areas that are next to streams that define major watersheds. Streams, therefore, take the brunt of this industry and although areas are only partially logged the harmful effects are felt on a disproportionate amount of the watersheds. Why will you not acknowledge this? (Director, Tribal Resources, Hoonah, AK - #A3024.51340)

**583. Public Concern: The Forest Service should manage vegetation for watershed health.**

All forestland should be managed as a watershed. The spacing of all vegetation must favor water production. This vegetation must be healthy, vigorous and all age classes must be in balance. The over-mature must be removed so that the balance is maintained. This spacing must be maintained from the top of the mountain to the valley and from the ridge top to the swale. (Individual, Klamath Falls, OR - #A8809.51000)

**584. Public Concern: The Forest Service should protect roadless areas.****TO PRESERVE WATERSHED HEALTH**

Undeveloped areas have been spared the increased erosion associated with roadbuilding, logging, and other forms of development, which causes damaging sedimentation of streams and rivers. Roadless areas harbor some of the country's most intact aquatic ecosystems and contribute to the recovery of degraded aquatic populations. The clean flows they provide are important not only to aquatic organisms, but also as sources of drinking water (42 million acres of national forest land are classified as municipal watersheds). Roadless areas help regulate stream flows and reduce flood threats, absorbing excess waters during storm events and releasing them slowly over time. (Organization, Missoula, MT - #A613.51000)

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. (Individual, Santa Monica, CA - #A1715.51000)

We need protected, untouched forest areas to help retain and purify our water supply. Undisturbed forest acts like a sponge, releasing water slowly into rivers. Logging roads cause horrible erosion which ruins fisheries, and clogs waterways with silt. (Individual, Roswell, GA - #A1467.51200)

The Forest Service did a thorough job of identifying the characteristics, environmental values, social and economic concerns when it evaluated IRA's in 1972 (RARE I), 1979 (RARE II), and additional reviews conducted since then. Watershed protection is arguably the most important value in social and economic terms, but is inextricably woven with overall ecosystem health. Although IRAs comprise less than 2% of land in the continental US, they provide about 14% of the nation's total water flow, and 33% of water in the West. (Individual, Vista, CA - #A4838.45100)

**TO PROTECT WATERSHEDS IN CALIFORNIA**

The last 30% of our wild national forests - with almost 4.5 million acres in California - provides a quality water source. This is especially critical in a state that has undergone water rationing several times in the last thirty years. (Individual, San Pablo, CA - #A5005.51320)

Here in California, WATERSHED PROTECTION is a very important issue and we must protect our water supply. It does not rain here in the summer, as I am sure you know, and we must not log in the roadless areas. (Individual, Santa Cruz, CA - #A908.51310)

**TO PROVIDE FOR IRRIGATION**

The Forest Service role in working with the states, tribes and communities should be in protecting the watershed for clean drinking water, wildlife, recreation, and irrigation. (Individual, Boise, ID - #A5731.50000)

Where I live we need the watershed to feed the streams, brooks, springs, and rivers which is for the various sports, hydro electric, and irrigation as well as drinking water and other commercial endeavors. (Individual, Great Falls, MT - #A5914.50000)

**TO PROTECT COMMUNITY WATER SOURCES**

Every community of any size that is adjacent to National Forest lands depends on surface water from those lands for its drinking water. Any ground disturbance, and particularly roadbuilding, loads sediment into the water, making it vulnerable to contamination from pathogens and more difficult to purify for potable use. As a 20-year water treatment engineer I can testify to the very substantial public health benefit of clean water from roadless lands. (Individual, Bozeman, MT - #A6189.51342)

**585. Public Concern: The Wilderness Act should be revised to protect drinking water.**

The Wilderness Act must be revised if we are going to have enough drinking water—2030 and beyond. (Individual, Klamath Falls, OR - #A8809.20206)

**586. Public Concern: The Forest Service should ensure that land designations do not interfere with management access to watersheds.**

Roadless areas by and large are key watersheds, which provide snowpack retention and habitat and protect water quality. Nevertheless, to designate these areas as wilderness would foreclose critical management activities that may be needed to protect the most important roles key watersheds serve. If specific designation of a roadless area is appropriate, it should be made under the local forest plan. (Association, No Address - #A21242.51300)

In the west, much of our local watershed is in our National Forests. It is imperative that roads be maintained, and access be allowed to these vital areas. Our very lives could depend on it. (Individual, Manti, UT - #A27830.51300)

**587. Public Concern: The Forest Service should recognize that there is no inherent watershed benefit associated with roadless area conservation.**

Watershed protection values have been misstated. The Weeks Law established eastern National Forests to produce wood and water. These are compatible uses. While all human uses have a risk of pollution, research has repeatedly shown normal harvesting does not impair water uses. Forestry is consistently ranked as one of the lowest sources of pollution by the US EPA.

There were many inaccurate statements in the May Draft EIS. Roadless conservation does not guarantee high quality water. Many natural conditions such as wetlands and acid geologic formations lower water quality. Nationally, grazing probably causes more pollution than roads. Based on my monitoring, recreation causes the most pollution in the White Mountain national Forest. The pathogens associated with backcountry waste disposal are a greater risk than timber harvesting. Roadless conservation does not prevent landslides. A study inventoried over 500 landslides in the White Mountain National Forest and concluded they were all due to natural events. Normal harvesting does not cause floods. On the other hand, studies show long term forest preservation reduces stream flow and increases nutrient release. It should be made clear there is no inherent watershed benefit associated with roadless conservation. (Individual, No Address - #A17292.45000)

**588. Public Concern: The Forest Service should identify critical areas of key watersheds.**

Critical areas of key watersheds also need to be identified and restored through road removal and other restoration efforts. (Professional Society, Missoula, MT - #A17054.45000)

## *Water Quantity*

**589. Public Concern: The Forest Service should increase logging to increase water quantity.**

Not enough emphasis has been placed on the importance of water in discussions of roadless areas. Whether or not to build roads or log has been front and center, but the importance of water, especially here in the West, has been ignored. The quantity of water delivered at the Forest boundary can be increased by certain silvicultural practices, including building roads and removing trees. (As in the Dead Horse Experiment on the Caribou National Forest, which demonstrates water yield could be increased tremendously.) National Forest lands that should be treated to increase water production are the areas that receive the most snow. These generally are the same areas currently designated as roadless. Setting

these aside would limit treatment to increase water production in the future. (Individual, Mapleton, UT - #A6978.51000)

In our region, it is evident by the overgrown condition of the forests that a controlled and environmentally sound timber harvest program is needed to accomplish the two main purposes of the USFS. In recent years, timber production in the region has virtually ceased resulting in deteriorating watersheds due to transpiration of water from too many trees. In some places, there are in excess of 1000 stems per acre. The Gila Wilderness provides a good example of the degradation of watersheds due to a policy of no timber harvest. Excessive tree density in this area has resulted in the diminution of grasses resulting in the accelerated runoff of rain and snowmelt with accompanying erosion. Creek beds that were small and had water in them much of the year are now fifty feet wide due to excessive runoff and only contain water during a storm. Does the Roadless Initiative seek to extend this kind of non-management that has resulted in an ecological disaster? (Individual, Ruidoso, NM - #A17775.51300)

### **590. Public Concern: The Forest Service should recognize that increasing logging will not increase water quantity.**

It is obvious that undue timbering, particularly on steep slopes that occur in the national forests, is very destructive of natural resources. It causes a loss of topsoil that took years to create and is difficult to replace. It silts up our streams with adverse effects on fish and other aquatic organisms, both by clogging their respiratory tracts and covering up the fertilized eggs needed for reproduction. It further silts up water used by around one-third of our citizens for their drinking water supplies, thus making water purification more expensive to a host of municipalities that do not have extra funds to spend. This is also disadvantageous to industries that use water from our watercourses. [Footnote 1: Strangely enough, it was recently contended, in litigation involving the Medicine Bow National Forest in Wyoming, that increased logging would “improve” a watershed by increasing water runoff. That claim was, however, rejected by the Tenth Circuit Court of Appeals, which sustained protection of the national forest against that attack.] (Organization, Birmingham, AL - #A21582.51300)

## **Air Quality**

### **Summary**

**General Comments** – Some respondents state there is a need to preserve and improve air quality. Common comments are that the Forest Service should protect air quality by strengthening the Clean Air Act (see also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Clean Air Act*), prohibiting road construction, and protecting roadless areas.

Some assert that the preservation of forests is important in creating sinks for the absorption of greenhouse gas emissions, particularly carbon dioxide. One individual points out, though, that protecting roadless areas will not increase carbon sink or reduce fires.

Others suggest that protecting roadless areas will counteract global warming and reduce the threat of asthma. One respondent states healthy forests maintain current radiation balance, which if thrown off balance would effect the earth both meteorologically and biologically.

**Adequacy of Analysis** – A few individuals ask the Forest Service to provide data regarding airborne contaminants from wildfire. One comments that the Forest Service does not seem to provide data on human health hazards emanating from the airborne contaminants from these wildfires, “the degradation of air in Class 1 air zones from these and other fires that are left to burn “naturally,” the transformation of growing forests which are carbon sinks into eventual over mature forests which are carbon emitters.”

**Effects of Activities/Disturbance on Air Quality** – Some respondents suggest that the Forest Service should plant trees to counter the effects of greenhouse gases and to absorb industrial air pollution; and should consider the contribution of old, rotten trees to greenhouse gases. Several believe building and maintain dirt roads causes air pollution through the dust that occurs. Another respondent suggests that mature trees and trees at risk of falling should be removed in order to improve air quality because of the excess carbon put back into the atmosphere. Others ask the Forest Service to address the impacts of motorized activity on air quality, and to carry out controlled burns in order to reduce air pollution.

### *Air Quality General*

#### **591. Public Concern: The Forest Service should define air quality as a key objective.**

Everyone will rally around the improved air quality theme, but it is your obligation to collect and disseminate the process to achieve this. Unless your request for input defines air quality as a key objective, the answers to your survey will be less than true. (Business, Vancouver, WA - #A670.52100)

#### **592. Public Concern: The Forest Service should protect air quality.**

##### **BY STRENGTHENING THE CLEAN AIR ACT**

One of the most important forest health problems is air pollution, which is greatly affecting the health and vigor of our eastern forests. I would encourage the FS to support strengthening the Clean Air Act and Clean Air Act regulations. A pro-active management approach to air pollution issues in roadless areas is needed. (Individual, Roanoke, VA - #A23081.30100)

##### **BY PROHIBITING ROAD CONSTRUCTION**

More roads add to more dust to create more air pollution. (Individual, Kalispell, MT - #A16734.52120)

#### **593. Public Concern: The Forest Service should protect roadless areas.**

##### **TO PRESERVE AIR QUALITY**

How are we going to breathe without the oxygen that the trees and other plants give off? If the world keeps on destroying our environment, pretty soon our planet will be an empty mass like Mars, with nothing but dust. (Individual, Allentown, PA - #A1468.50000)

Our heritage as Americans is more than our political system, more than our social environment, our civil liberties. The greatest heritage is the land itself, the beauty of Mother Nature all around us. What would life be like without forests and untainted streams and rivers? We are yet still animals, we are Mammals. Does the Bush administration feel that we can survive without our partners in respiration? Our very breath gives life to the trees in this world and they then in exchange give us ours. (Individual, Dewittville, NY - #A1500.50000)

##### **TO CREATE SINKS FOR THE ABSORPTION OF GREENHOUSE GAS EMISSIONS**

Forests contribute to the prevention of carbon dioxide build-up, a factor of major importance in our future. (Individual, Metuchan, NJ - #A507.52130)

The preservation of forests is especially important in creating sinks for the absorption of greenhouse gas emissions, particularly carbon dioxide. (Individual, Evanston, IL - #A991.52130)

##### **TO COUNTERACT GLOBAL WARMING**

Global Warming is in full-swing. I believe protecting these roadless areas is best for future generations of Americans and the world, and all of humanity. (Individual, Lafayette, CO - #A807.50400)

Integrity of our forests is vital to the well being of all the creatures on the globe. Roads will facilitate the increase of forest loss by epidemics caused by introduction of organisms lethal to the trees growing there brought by equipment, personnel, visitors from other places. There are hundreds of examples of loss of forests throughout the world due to introduction of exotic pests. Each time these forest deaths increase the atmospheric CO<sub>2</sub>, and decrease atmospheric O<sub>2</sub>. Biomass accumulation through forests killed by diseases where no resistance has been established is a significant cause of global warming. Opening roads in forests is the highway for introduction of exotic pests. Surely this must be also considered in the details of the Kyoto Accords. (Individual, Sausalito, CA - #A1344.50400)

Alaska is facing, perhaps more than any other state, the threats of global climate change. The residents of Shishmarof can testify to that truth, as well as scientists at the University of Fairbanks and around the world. Forests are valuable carbon dioxide recyclers and contribute to reductions of CO<sub>2</sub> in the atmosphere. (Individual, Chugiak, AK - #A261.50410)

#### **TO REDUCE THE THREAT OF ASTHMA**

Forests provide oxygen for the air we breathe. We are such hypocrites to bemoan the fact that the rain forests are being destroyed along with their capacity for producing breathable air, when we have little respect for the clean air our own trees provide. The percentage of increase for asthma in the United States in the last ten years is incredibly high. Could there be a correlation between our declining breathable air from fewer trees cleaning up the air pollution and the rampant rise in asthma? Asthma is a killer and is nothing to ignore! (Individual, Gainesville, FL - #A222.52130)

Trees provide oxygen. If we have no trees watch asthma cases rise. Where will nature go? (Individual, Bettendorf, IA - #A4356.52130)

#### **594. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule will not increase carbon sequestration.**

Please revise the Rule!!! It will not protect the forest, increase carbon sink, reduce fires, or generally help forest health. (Individual, Piney View, WV - #A12597.10131)

#### **595. Public Concern: The Forest Service should protect forests to maintain the current radiation.**

Our forests are important [for] maintaining the current radiation balance and without them could upset the proper balance of incoming to outgoing radiation, which in turn will affect our Earth meteorologically and biologically. (Individual, Somerville, MA - #A42100.50400)

### *Adequacy of Analysis*

#### **596. Public Concern: The Forest Service should provide data regarding airborne contaminants from wildfire.**

The Forest Service has never provided definitive data on the real human health hazards emanating from the airborne contaminants from these wildfires, the degradation of air in Class 1 air zones from these and other fires that are left to burn "naturally", the transformation of growing forests which are carbon sinks into eventual over mature forests which are carbon emitters. (Individual, Seeley Lake, MT - #A8075.14100)

As a member of the Governor's Clean Air Committee here in Vermont, I am very concerned with the serious threat to our air quality posed by the millions of acres burned last summer and again this summer. The majority of our air pollution comes from outside Vermont. The jet stream and prevailing winds bring significant ash and other pollutants from the west, southwest and south to Vermont. This is contributory to our higher than normal incidence of respiratory disease. Some scientists have calculated that the pollution from the fires last summer exceeded the pollution of fossil fuel power plants by a

factor of greater than ten for the entire year. This is not acceptable when poor air quality is a serious health issue. Moreover, it seems likely that western fires are contributing to the reported pollution-related forest degradation in Vermont. (Individual, South Royalton, VT - #A13393.52110)

## *Effects of Activities/Disturbance on Air Quality*

### **597. Public Concern: The Forest Service should plant trees.**

#### **TO COUNTER THE EFFECTS OF GREENHOUSE GASES**

It is not only the tropical rain forests that need to be protected for the ecological health of this planet, but the last wild, roadless areas of our now National Forests. Carl Sagan in his last book . . . states that we need to plant additional trees to counter the greenhouse gasses we currently produce, equal to the area of the United States, today! (Individual, Santa Barbara, CA - #A4860.50410)

#### **TO ABSORB INDUSTRIAL AIR POLLUTION**

This should now be part of any forest or energy plan. The Nation needs to engage in greater reforestation and planting of trees which, in turn, will support our industrial base by absorbing the CO<sub>2</sub> it generates. Without the added trees, we shall clearly have greater problems ahead. The government could invest more funds into programs for planting trees, but how much more cost-effective is it to preserve those that we already have in the national forests? That will not cause any cash outlays! (Organization, Birmingham, AL - #A21582.50410)

### **598. Public Concern: The Forest Service should consider the contribution of old, rotten trees to greenhouse gases.**

When old trees fall over and start to rot, much of the absorbed carbon gets released back into the atmosphere. A well-managed growing forest is our best protection against greenhouse gases. (Association, South Hill, VA - #A17035.50410)

### **599. Public Concern: The Forest Service should remove mature trees and trees at risk of falling.**

#### **TO IMPROVE AIR QUALITY**

We can unite all opinions if we concentrate on air quality - a universal need. Fifteen years ago, a group of us including Audubon and Sierra members, plus foresters and conservationist decided to make personal tests on improving air quality as well as improving fish and wild life habitat - yet maintaining the desirable forest environment for our square mile forest and lake home site area. We have been removing mature and risk trees that would fall down, opening the canopy so sunlight could increase growth. After fifteen years we enjoyed an increase in wood fiber from 6,000,000 board feet to 9,000,000 board feet - a 50% increase in sequestration - converting carbon dioxide into wood fiber and releasing two molecules of oxygen for each molecule of carbon removed from the atmosphere. An adjacent area with restrictions and no personal access, was cruised with very little additional increment of growth. Converted to pounds of carbon dioxide - our area took 30,000 tons of CO<sub>2</sub> out of the air. This is two or three times as much as a nearby restricted area. We have asked the Department of Natural Resources of the State of Washington as well as Bureau of Land Management to see how we have maintained the forest environment as well as provided for fire control. There are more than 3,000 similar private forest ownership's, each of whom could improve air quality and fire control with no government or state subsidy. We can factor this with the air pollution from last season's forest fires. If only a percentage of these private ownership followed a similar plan the entire added CO<sub>2</sub> from the fires would be consumed and converted to usable fiber. Forests are the most important element to improving air quality and planting trees is only a first step. We need to improve the efficiency of our forests to make up for the continuing use of fossil fuels. We proved it can be done, and your foresters know it can be done if all people know the facts of air quality improvement. (Association, Vancouver, WA - #A279.52130)

## 600. Public Concern: The Forest Service should address impacts of motorized activity on air quality.

### VEHICLE EMISSIONS

I have seen it happen, moving to a pristine area full of wildlife and fruits. My Mom and I used to come out of the woods with gallons of wild berries, each day. Two years later, a highway is put through allowing access to diesel vehicles to another area. In one season, I have seen hundreds of thousands of frogs, toads, snakes, fox, wild berries, and fruit disappear, never to return. We are lucky to be able to pick a half cup of berries from the same bushes we had picked gallons from before. Diesel, snowmobile and auto fumes are bad to fragile systems. I have seen it myself. I don't need a study to tell me. (Individual, Antonito, CO - #A21454.60300)

### CONSTRUCTION EQUIPMENT

I have not even mentioned the vast amount of noise and air pollution from the construction equipment used to build these roads. (Individual, Radford, VA - #A9397.52100)

## 601. Public Concern: The Forest Service should carry out controlled burns.

### TO REDUCE AIR POLLUTION

This year as I was hiking with my wife, we saw an area that had burned just North of Troy, MT. The fires burned along the perimeter of an old blocked off logging road. I point that out to show that roads give us natural fire breaks that help prevent small fires from becoming big fires. We also saw evidence where fire fighters used the road to get to the fire quickly. Again, these roads are valuable in the effort to control wildfires. From a pollution standpoint, it is important to use every means necessary to keep wildfires small. The fires in Montana this year and last produced as much pollution for the environment as industry ever would in an entire year. I could only hope that all people would have to sit around breathing in the smoke from wildfires for a month or so every summer. Perhaps that would help change their minds. (Individual, Kalispell, MT - #A27110.30200)

## Soils

### Summary

**Soils General** – One individual urges the Forest Service to recognize the environmental importance of soil—”Man’s most important ‘natural resource’ is the soil!! The soil supports all lakes, rivers, vegetation (due to rainfall and weather), wildlife and man!”

**Adequacy of Analysis** – Another association suggests that the Forest Service develop a national interagency soil survey and inventory program with standardized monitoring methods in order to assess current and future health need, as well as impacts from various uses, including grazing. One respondent requests that the Forest Service address soil composition in individual forests rather than create blanket legislation for all areas.

**Effects of Activities/Disturbance on Soils** – Several respondents comment on the effects of activities on soil. They suggest that the Forest Service address the effects of timber removal on surface soils, the effects of logging and road building on erosion and landslides, and the effects of soil compaction. Others advise that biomass from habitat restoration work should be retained to provide nourishment for the soil.

## *Soils General*

### **602. Public Concern: The Forest Service should recognize the environmental importance of soil.**

Man's most important "natural resource" is the soil!! The soil supports all lakes, rivers, vegetation (due to rainfall and weather), wildlife and man! Let nature support itself, as it did before man tried to be the politically determining factor! (Individual, Coeur d'Alene, ID - #A16085.52200)

## *Adequacy of Analysis*

### **603. Public Concern: The Forest Service should develop a national interagency soil survey and inventory program with standardized monitoring methods.**

#### **TO BETTER ASSESS THE CURRENT AND FUTURE HEALTH OF THESE LANDS, AS WELL AS IMPACTS FROM VARIOUS USES**

With regard to roadless areas currently used for grazing, CCA supports a national interagency soil survey and inventory program and standardized monitoring methods to better assess the current and future health of these lands, as well as impacts from various uses, including grazing. (Association, Sacramento, CA - #A3681.30100)

### **604. Public Concern: The Forest Service should address soil composition in individual forests.**

Forest health must be addressed by treating each forest area as unique. Soil composition is quite varied; why introduce a blanket legislation to cover soils and vegetations existing in a large variety of substrates, climates, and latitudes? This is not based on good science. (Individual, Jackson, WY - #A29552.52200)

## *Effects of Activities/Disturbance on Soils*

### **605. Public Concern: The Forest Service should address the effects of activities on soil.**

#### **EFFECTS OF TIMBER REMOVAL ON SURFACE SOILS**

My studies of the effect disturbance (e.g., clear-cutting and other forms of timber harvest) has on forest surface soils suggest, at least for the North American forest types studied, a high potential for lasting damage that could have ecosystem-level impacts as a result of the disturbance. My studies have indicated highly significant losses of organic maternal and nutrient cations (e.g., K and Mg) from surface soils within three years post clear-cut. Similar findings have also been described for other forests (North American, European, and others). Immediate detrimental effects (within three years post clear-cut) have been observed for soil microbial communities, which could have lasting effects on the abilities of these soils to recycle nutrients for these ecosystems. Similar findings, although not quite as dramatic, have been found in areas where selective harvest techniques have been used (using heavy equipment). Of course one of the critical factors required for either clear-cutting or selective harvest using heavy equipment is the necessity of building roads into the site. Therein lies my concern with the Bush Administration's request to revisit the Roadless Area Conservation Rule approved by the Clinton Administration. (Professional Society, Hixson, TN - #A26223.52200)

#### **EFFECTS OF TIMBER LOGGING AND ROAD BUILDING ON EROSION AND LANDSLIDES**

. . . Oregon, most of the mudslides in the last five years are a direct result of clear-cuts and placement of logging roads on slopes too steep to support such roads. Obstruction of vital watersheds as a result of erosion from clear-cutting and logging roads has already caused irreparable damage. (Individual, No Address - #A3863.51341)

I am also very aware of the effect of road-building and tree-harvesting on areas down-hill when heavy rains occur. Citizens of our state have suffered loss of all they have in part because of destruction of natural areas for commercial gain. (Individual, Morgantown, WV - #A4000.51341)

These unlogged and unroaded areas also protect private property from landslides and flood damage. (Individual, Santa Monica, CA - #A1715.45000)

#### **EFFECTS OF SOIL COMPACTION**

Logging and roadbuilding compact soils, disturb or destroy organic layers, and cause high rates of soil erosion. Trees' access to nutrients and water is reduced because of restricted root growth in compacted soils, reduced water infiltration rates, and decreased oxygen and water available to root systems. Soil compaction also adversely impacts microorganism communities such as mycorrhizal fungi, which are important to many tree species in accessing nutrients. (Individual, Anchorage, AK - #A20934.52200)

#### **606. Public Concern: The Forest Service should retain biomass from habitat restoration.**

Appropriate habitat restoration work should, of course, be allowed, but the biomass from that work should not be removed from the forest, to supply wood or pulp or fiber for commercial interests. Instead it should be allowed to decompose or be burned in piles where it will nourish the soil, in places. (Organization, San Francisco, CA - #A11992.52220)

## **Scenery**

### **Summary**

A few people comment that the Forest Service should place greater value on scenic resources. One Organization asserts that the Roadless Rule would be the best way to preserve the scenic beauty in roadless areas. While others comment that the implementation of a national roadless rule would provide relief from what they see as unsightly even age management.

#### **607. Public Concern: The Forest Service should place greater value on scenic resources**

##### **BY COMPLETING VISUAL ASSESSMENTS OF ALL ROADLESS AREAS**

In a recent policy study evaluating the impact of federal laws on scenic conservation, Scenic America pointed out that NFMA and its accompanying regulations undervalues scenic resources. We strongly urge the Forest Service to complete visual resource assessments of all existing roadless areas. Furthermore, we believe that the Roadless Rule would provide the greatest possible protection for the scenic beauty in roadless areas. (Organization, Washington, DC - #A22098.45100)

#### **608. Public Concern: The Forest Service should implement a national roadless rule.**

##### **TO PROVIDE RELIEF FROM UNSIGHTLY CLEAR CUTS**

We need scenic, unroaded forest landscapes for relief from mountains with their tops cut off or their trees stripped. (Individual, Soddy Daisy, TN - #A15286.70310)

## **Wildlife**

### **Summary**

**General Comments** – Wildlife is a major issue to a number of respondents. A number of people believe that the protection of roadless areas will be beneficial to wildlife, amphibians, and

subsistence species by ensuring reproductive capability and providing wildlife corridors. Other respondents provide a number of suggestions on how the Forest Service should protect wildlife. These suggestions include actively managing roadless areas, allowing state fish and wildlife agencies to manage populations, allowing field research in roadless areas, and implementing the Theodore Roosevelt Conservation Alliance Square Deal Initiatives. On the other hand, some respondents comment that some land designations may restrict wildlife management and request that the Forest Service avoid making those designations. Others suggest that managing for individual members of species will have negative impacts over the long term. At the same time, a few respondents suggest that some wildlife management activities and restrictions are carried out to the detriment of humans, and assert that the Forest Service should value human life over wildlife and plant life.

**Species-Specific Considerations** – Some respondents comment about specific species. Several people request the protection of roadless areas for the sake of certain species such as brown bears, yellow-legged frogs, lynx, cutthroat trout, and butterflies. Some comment as well about the reintroduction of predator populations. Specifically, some state that “PREDATOR reintroduction and protection should be a management objective,” while others assert that “the reintroduction of coyotes, wolves, and bears to certain areas is upsetting the balance that was established with the people population increase.”

**Funding** – Respondents offer several comments regarding funding related to wildlife. One individual requests that the Forest Service more effectively utilize funds earmarked for the protection of wild horses. An organization responds that building roads in the Skagit River watershed would route funds away from salmon recovery efforts.

**Effects of Activities/Disturbance on Wildlife** – Some general comments regarding the effects of activities/disturbance on wildlife suggest that wildlife is not adversely impacted by certain activities. For example, some respondents assert that roads do not harm wildlife, including fish and the desert tortoise, nor do roads impede wildlife movement. People also suggest that vehicles do not disturb wildlife.

A number of respondents suggest that positive effects result from certain activities or disturbances. Some activities suggested to be beneficial to wildlife include timber removal such as thinning, dams and fish passage ladders, and ranch management. Some suggest that fire, disease, and insects are beneficial to bird species. One individual suggests that the Forest Service should provide retaining pools when installing culverts for the benefit of wildlife during the dry season.

A greater number of respondents, however, suggest a wide array of negative effects of specific activities and disturbances on wildlife. Writers advise the Forest Service to address the negative effects of roads on wildlife. Some suggest specifically that roads have negative effects on fish, suggesting that roads cause sedimentation, loss of spawning habitat, and facilitate the stocking of non-native species, overfishing, and disease transmission. Respondents also ask the Forest Service to address the negative effects of off-road vehicles, inadequate stream culverts, timber removal, hiking, and fire on wildlife. Some comment that the Forest Service should protect wildlife by closing roads or prohibiting all active management and resource use.

## Wildlife General

### 609. Public Concern: The Forest Service should protect roadless areas.

#### FOR WILDLIFE

I support the Roadless Area Conservation Rule JUST AS IT IS. Here are some reasons why:

Montana roadless lands provide some of the best hunting, camping, wildlife habitat, and trout waters left in our nation. These roadless areas sustain mountain streams that are the lifeblood of legendary trout waters and the source of drinking and irrigation water for many communities. In Montana traditional Western trails traverse areas without roads providing habitat for wolverine, mountain goat, bighorn sheep, elk, pine marten, lynx, and black and grizzly bear. These animals do not survive well when we build roads and interfere with their territory. When there are roads there is so much more human activity in their homes.

Only national protection will guarantee that Montana's wild national forest lands remain intact regardless of changing politics and personnel. The issues of inholdings, fire, floods, and forest health raised in the revision process are rightfully addressed by the existing policy. Montana's rugged roadless lands and traditions are a public land legacy, a priceless gift for our kids and all generations in an increasingly crowded and commercial world.

I live in the Gallatin Valley of Montana and it is becoming more and more crowded every year. The only places available to recreate are public lands unless one is wealthy enough to buy their own. The survival of the above mentioned wild animals is important to me. It gives me a big thrill to see some of this wild life occasionally. (Individual, Manhattan, MT - #A5633.10150)

#### FOR AMPHIBIANS

The Southern Appalachians, in particular, are home to a wide diversity of vascular and vertebrate species, some of which are endemic, some are found nowhere else on earth, and many are found nowhere else in North America in such concentration of species diversity. Many of these, especially amphibians, are dependent upon clean and clear-flowing water supplies which are provided by interior (roadless) area, but threatened by logging and roadbuilding and their associated siltation and stream degradation. (Organization, Bland, VA - #A17007.50500)

#### TO MAINTAIN HEALTHY FISHERIES

Protecting existing roadless areas makes sense both ecologically, economically and morally. As stewards of God's green earth, we have the duty to protect the natural environment for generations who are to come after us. Protecting the pristine, wild nature of these areas is economically beneficial as we allow sporting activities in these areas. Ecologically and biologically, roads should not be constructed in the existing roadless areas of our national forests and grasslands. These roads threaten vital trout and salmon which are a national treasure. (Individual, No Address - #A4575.10150)

Much of the remaining integrity of our fisheries relates directly to the absence of roadbuilding and management activities in our tiny percentage of remaining roadless areas. The Wild and Scenic Elk River, located in the Powers Ranger District of the Siskiyou National Forest, is a watershed of specific interest to me as a fisherman and frequent visitor. To maintain its exceptional water quality and its phenomenal Chinook salmon and steelhead fishery, it is absolutely crucial to fully protect the Copper Mountain Roadless Area, the proposed Copper Salmon Wilderness, and *all* presently unroaded areas of Elk River watershed. (Individual, No Address - #A27799.51000)

The Southern Appalachians, in particular, are home to a wide diversity of vascular and vertebrate species, some of which are endemic, some are found nowhere else on earth, and many are found nowhere else in North America in such concentration of species diversity. Many of these, especially amphibians, are dependant upon clean and clear-flowing water supplies which are provided by interior (roadless) areas, but threatened by logging and roadbuilding and their associated siltation and stream degradation. (Organization, Bland, VA - #A17007.50500)

Watershed purity here in the Tongass communities is essential for healthy salmon runs. The Salmon and other fisheries are essential to the economy of Southeast Alaska. Tree dumps, silt, runoff from logging roads and inadequate buffer zones to protect streams are in direct conflict with healthy ecosystems and healthy salmon runs. (Individual, Juneau, AK - #A30033.51000)

The general national road building prohibitions and limited exceptions contained in the Roadless Rule should be retained. At the local planning level, specific restrictions should apply to road-building, reconstruction, or off-road vehicle use in inventoried roadless areas that have watersheds containing aquatic diversity areas identified through regional, forest, or watershed assessments. (Organization, Eugene, OR - #A29717.51300)

#### **TO ENSURE REPRODUCTIVE CAPABILITY**

All of these creatures live in different ways, but all share at least one thing in common: they all live to produce. This is true for any organism. Every organism has means of reproduction. It was through the process of reproduction that organisms evolved into their present forms. Reproduction is vitally important. If a species as a whole were to lose its ability to reproduce, then that species would disappear from this earth NEVER TO APPEAR AGAIN! That is why reproduction is so important. In order for reproduction to occur, a number of things are necessary. Above all else, most important to reproduction is food and water; an organism can't reproduce if it is not adequately nourished and therefore unhealthy. Secondly and equally important to reproduction is the organism's ability to find a home. I define the word 'home' as the place where an organism finds food and water and also looks for a mate. In order for reproduction to occur, AN ORGANISM NEEDS A HOME . . . Extinction is the result when the members of a species lose their homes and cannot find a new home. The loss of homes is what causes extinction. . . . We (people) call these places where life finds homes in great numbers: forests. Forests are the homes of life. Gone are forests, gone is life. (Individual, Austin, TX - #A22389.53100)

It must be remembered that mere presence of a species is not the issue; it is reproductive success that matters. Throughout America, many species are dependant upon the habitat and security afforded by roadless areas for sustaining viable populations of themselves. National implementation of roadless area protection would give an immediate substantial boost to biodiversity. Even the Forest Service and State agencies, who generally favor intensive management regimes, admit that fragmentation of habitat should be guarded against for species like the Cow Knob Salamander (endemic to Shenandoah Mountain on the GWNF; the highest concentration of roadless areas on the Forest is found here). Ensuring protected status for roadless/unroaded areas, with the associated ecosystem recovery, could extend safeguards to other, perhaps as yet unknown, species that presently suffer from habitat fragmentation, alteration, and loss. For example, many species of neotropical migratory songbirds that depend on unfragmented mature deciduous forest are in decline. Intact habitat areas serve as a population "source" for the "sink" habitats that the developed landscape has become. Roadless areas now serve as biotic reservoirs in this era of advancing human development. (Individual, Staunton, VA - #A30027.53200)

#### **FOR SUBSISTENCE SPECIES**

Protecting roadless areas from roads and logging will also have benefits to subsistence uses of the Tongass. In particular, roadless area protections will help keep habitat intact and ensure forage for Sitka black-tailed deer, an especially important species for subsistence hunters in the region. (Organization, Sitka, AK - #A30486.53300)

#### **TO PROVIDE WILDLIFE CORRIDORS**

Wildlife corridors can be provided using roadless areas. Wildlife needs corridors to travel between safe havens. (Individual, Silverthorne, CO - #A28101.53100)

### **610. Public Concern: The Forest Service should protect wildlife.**

#### **BY ACTIVELY MANAGING ROADLESS AREAS**

Being an avid hunter, I am very much aware the game animals survive better where the forest is managed than where it is not. (Individual, Okanogan, WA - #A791.30000)

Anyone who has taken Ecology 101 knows that the climax plant community in most of the mountainous West is a coniferous forest of some type, dependent largely on altitude and aspect. As a wildlife biologist, I believe timber needs to be managed. Coniferous forests do not typically support the greatest diversity of wildlife resources. I urge that timber management/wildlife management be woven into the final management plan for our national forests. (Individual, Salem, OR - #A4253.30100)

**BY RETURNING TO ITS ORIGINAL ROLE OF PROTECTING THE LAND AND ITS WILDLIFE, AS IN THE DAYS OF GIFFORD PINCHOT**

Question regarding describing values. The Forest Service should consider the fact that most of the land area of the United States is roaded and that the Forest Service's role should be returned to its original function of protecting the land and its wildlife as it was in the days of Gifford Pinchot. (Individual, Helena, MT - #A5394.12120)

**BY MANAGING WILDLIFE AND WILDLIFE HABITAT IN COOPERATION WITH STATE DEPARTMENTS OF NATURAL RESOURCES**

I believe the U.S. Forest Service with state D.N.R. cooperation can manage our wildlife and wildlife habitat. (Individual, Mosinee, WI - #A12172.30100)

**BY ALLOWING STATE FISH AND WILDLIFE AGENCIES TO MANAGE POPULATIONS**

The USFS should continue to allow the state fish and wildlife agencies to manage the fish and wildlife populations through carefully regulated hunting and trapping seasons on the USFS lands, because these are vitally important management tools that help balance wildlife populations with people's needs and desires, and provide many benefits to the public at large with no cost to taxpayers. (Individual, Columbia, MO - #A52517.15123)

**BY ALLOWING FIELD RESEARCH IN ROADLESS AREAS**

**Observance of fish and wildlife populations and their natural processes should be allowed.** Fish and wildlife biologists come to the Copper River Delta for field research because they can do something here that they cannot do in other places, observe these populations and their natural process. In other words, there are precious few other undisturbed areas for conducting such research. Research should be an encouraged activity in IRAs. (Organization, Cordova, AK - #A23229.90100)

**BY ALLOWING WILDLIFE RESEARCH, TROUT STOCKING, AND WILDLIFE LAW ENFORCEMENT ACTIVITIES IN AREAS WHERE EXISTING ROADS ALREADY ALLOW MOTORIZED ACCESS**

Wildlife research, trout stocking, wildlife law enforcement, and prescribed burning should be other expressly allowed activities where use of motorized equipment on existing roads is permitted. These activities are consistent with the existing Jefferson National Forest Land Management Plan. (State Agency, Richmond, VA - #A6048.90100)

**BY SUPPORTING LEGISLATION TO PRECLUDE, PREVENT, OR OVERRULE LAWSUITS DESIGNED TO MITIGATE THE SCIENTIFIC MANAGEMENT OF WILDLIFE**

Please consider legislation to preclude/prevent/overrule precocious lawsuits designed to mitigate the scientific management of all wildlife. (Individual, Petaluma, CA - #A16026.20000)

**BY IMPLEMENTING THE THEODORE ROOSEVELT CONSERVATION ALLIANCE SQUARE DEAL INITIATIVES**

I am an avid outdoor enthusiast who believes that you and your new Administration should embrace the Theodore Roosevelt Conservation Alliance's Square Deal Initiative. These initiatives will create a public lands legacy in the coming century that is synonymous with the vision of Theodore Roosevelt, America's greatest conservation president. Initiative #1 asks you to scientifically manage all fish and wildlife habitat in the National Forest System, whether roaded or unroaded, as valuable and unique lands that will remain open to hunters, anglers and other public users. I, along with the TRCA, urge you to balance accessibility to National Forest Lands, with the year round requirements of fish and wildlife such as habitat, clean water, food, shelter, open space and disturbance management, while maintaining a functioning forest road system. This includes keeping roadless areas roadless with science-based exceptions made for forest health, restoration and other national needs. And we also ask that you embrace Initiative #2 to dramatically increase funding and accountability for active fish and wildlife. Funding priorities should not be tied to any commodity production formulas, but rather to achieving

long-term, sustainable fish and wildlife populations. Funding should also include programs that involve all communities in promoting sound forest stewardship and restoration to enhance water quality and fish and wildlife habitat. Bob Munson, our TRCA Director has stated: "In honor of the 'Square Deal' that was TR's hallmark from 1901-1909, our country can settle for nothing less than the public's continued use and enjoyment of their public lands with a priority placed on maintaining healthy and vibrant fish and wildlife habitats." I agree with Bob. Let's use these initiatives to make fish and wildlife a priority on our National Forests. (Individual, Luverne, MN - #A4538.53100)

#### **BY PROTECTING SOUTHERN APPALACHIAN ROADLESS AREAS**

The Southern Appalachians support a world-class biological diversity of plants and animals, which can only be preserved by setting aside from logging and road building large tracts of unfrequented forests. The roadless areas on our public lands contribute significantly to the fact that the Southern Appalachians host one of the world's greatest diversities of mussels and fish and more than half of all tree, fern, and flowering plant species found on the North American continent. More than 3,000 species of flowering plants, 690 vertebrates, and over 120 species of trees all thrive in the roadless areas of this region. Scientific studies have shown that many of our region's species experience serious population declines when faced with habitat destruction caused by logging and road construction. Black bear populations are threatened by excessive road densities. Trout need streams free of sediment caused by erosion from roads and logging to flourish. Similarly, in the biologically rich Southern Appalachians, threatened and endangered species of other animal and plant life benefit from safe havens where logging and road building is not a threat.

As indicated by Dr. James Petranka in his letter to the Forest Service of July 12, 2000, salamanders provide "a compelling example of the need to prohibit logging in the roadless areas." See Attached statement. The Southern Appalachians have perhaps the greatest taxonomic diversity, density and biomass of salamanders in the world according to Petranka. And in order to preserve this biodiversity, roadless areas must be left relatively undisturbed. A recent study showed that clearcuts had a significantly lower abundance and fewer species of salamander compared to mature forest stands in the Southern Appalachians. *J. W. Petranka, M. E. Eldridge and K. E. Haley, Effects of timber harvesting on southern Appalachian salamanders, 7 Conservation Biology 363-370, (1993)*. Plethodon salamanders, common to our region, have especially high mortality after development activities, because they have small home ranges and are unlikely to relocate to intact forests from logged areas. *Id.* at 363. The relatively common land salamander *Plethodon jordani*, an important part of the food chain of our southern forests, completely disappears from clearcut sites in the Southern Appalachians. *A. N. Ash, Disappearance of salamanders from clearcut plots, 104 The Journal of the Elisha Mitchell Scientific Society 116-122, (1988)*. (Organization, Charlottesville, VA - #A15659.53100)

#### **611. Public Concern: The Forest Service should avoid making land designations that restrict wildlife management.**

The Department and other agencies and entities must have the ability to take necessary management actions to ensure the continued well-being of populations of wildlife on the National Forests. The Department does not support additional land designations (e.g., Wilderness designation) or regulations that have the potential to limit or restrict our ability to conduct necessary wildlife management activities on Forest Service lands. (State Agency, Phoenix, AZ - #A22073.53000)

#### **612. Public Concern: The Forest Service should recognize the long-term negative impacts of managing for individual members of species.**

You are presently managing for individuals of a species by halting or severely limiting all activities in an area. The long term impacts will be degrading to the site and eventually damage the species you claimed to be protecting. It is my contention we are managing strictly for the present with no thought to the future. (Individual, Carson City, NV - #A21959.53000)

#### **613. Public Concern: The Forest Service should protect grassland species.**

Administered by the Forest Service, the National Grasslands comprise nearly four million acres of sage steppe and prairie throughout the Great Plains and the intermountain West. National Grasslands are

found in every state from North Dakota south to Texas, as well as Idaho and Oregon. Comprising a critical but often neglected component of our National Forest System, National Grasslands are still home to a vast array of plants and animals. The imperiled black-tailed prairie dog, for example, is a keystone species of the grassland that provides food, shelter, and habitat benefits for numerous other declining species such as the burrowing owl, mountain plover, swift fox, ferruginous hawk, and America's most endangered mammal, the black-footed ferret. Some nine different prairie species are dependent on prairie dogs, and additional 20 species opportunistically take advantage of prairie dog colonies, and 117 more have a relationship with prairie dog towns. The grasslands of the United States, in fact, support some 7,500 species of wildlife, including pronghorn antelope, elk, mule deer, bighorn sheep, golden eagles, numerous kinds of hawks, sage grouse, prairie chickens, whooping cranes, badgers, and an abundant variety of grassland birds.

More than 50 prairie grassland species, however, are now either listed as endangered or threatened under the Endangered Species Act, and more than 700 are candidates for listing. Of the 435 bird species that breed in the United States, 330 of them breed in the grasslands of the Great Plains—and grassland bird species have consistently shown steeper population declines than any other North American birds. (Organization, Reston, VA - #A21625.53000)

**614. Public Concern: The Forest Service should treat wildlife and domestic livestock equally.**

Give wildlife equal right with domestic livestock you allow to graze on forest land. (Individual, Roswell, NM - #A11007.53000)

**615. Public Concern: The Forest Service should value human life over wildlife and plantlife.**

It seems to me that the main people who are aware of these comment periods are the tree-huggers who think that even weeds are more important than people. When a fish that is too stupid to survive takes precedence over people's lives and livelihoods, there is something really wrong with this picture. I have nothing against trying to save endangered species, most of them seem to be endangered because of loss of habitat, which is not a reason to close off areas completely. In California, the tree-huggers even managed to get loc-weed on the endangered list. They did this by using the scientific name. This is not an endangered plant! Western ranchers have been trying, without success, to get rid of this noxious weed as long as there have been ranches in the west. Another farce is the highly endangered Joshua Tree. There are many square miles of them in at least three states. (Individual, No Address - #A8252.15121)

Last month 4 brave true Americans lost their lives because of environmental red tape. A helicopter was not able to get water out of a stream because of endangered fish. Sad day for this country when fish in a stream have more rights than human life. (Individual, Jennings, KS - #A8874.53200)

People should come first, not a turtle or an owl or a rat . . . People need to be able to protect themselves from fire and flood. What good does it do to protect an owl's habitat from people if a fire comes along and destroys the forest because loggers can't come in and clean up an excessive fuel load. There needs to be a middle ground. (Individual, Centerfield, UT - #A27645.30400)

**616. Public Concern: The Forest Service should manage wildlife under recommendations of local fish and game agencies.**

The Forest Service should consider the following characteristics of each inventoried roadless area on each Forest separately (specific activities that should be allowed): **Wildlife**—Forest activities (i.e., timing and intensity) should be governed, in part, by recommendations of the local game and fish agencies, e.g., with regard to mating and nesting seasons. Additionally, as silvicultural practices permit, consideration should be given to effect on habitat of local wildlife and fish species. Special attention should be directed toward streamside activities which may impact fisheries ecology. (Individual, Fort Collins, CO - #A17987.53100)

## Wildlife General – Species-Specific Considerations

### 617. Public Concern: The Forest Service should protect roadless areas.

#### FOR BROWN BEARS

In addition to recreation opportunities, roadless areas are essential for important species of wildlife, particularly brown bears (Suring et al 1997). “The Kenai peninsula has received some of the most significant human impacts in Alaska, to the detriment of some wildlife populations and habitat.” “Bear populations and their habitat are declining due to direct human-caused mortality and human encroachment.” (Organization, Anchorage, AK - #A17358.53200)

#### FOR YELLOW-LEGGED FROGS

I am concerned about the welfare of two of my favorite amphibian species that live in the Sierras, the Foothill Yellow-Legged Frog, and the Mountain Yellow-Legged Frog. Both species live in forested areas, and the Mountain Yellow-Legged Frog is the only frog that lives high up in the Sierra Nevada mountains. (Individual, Redding, CA - #A5690.53000)

#### FOR LYNX AND CUTTHROAT TROUT

The Wyoming Range is a spectacular forest with Canadian lynx and Bonneville cutthroat trout living there—two wildlife species that are very sensitive and imperiled. We need to protect the last remnants of unroaded country in Wyoming to maintain habitat for these unique species. (Organization, Sheridan, WY - #A17593.53000)

#### FOR BUTTERFLIES

I have urged for years that the Dark Divide area in the Gifford Pinchot Nat. Forest be included in Wilderness—it is an important butterfly habitat, and motorbikes are and will continue to destroy the vegetation upon which the butterflies depend. (Individual, Tacoma, WA - #A11709.60000)

#### FOR BEARS AND WOLVES IN THE COOPER RIVER DELTA

I encourage protection of Bears and wolves in the Cooper River Delta. (Individual, Anchorage, AK - #A25357.53000)

### 618. Public Concern: The Forest Service should determine the degree to which native trout are linked to undeveloped areas on public lands.

Despite the ecological significance of roadless areas, millions of public land roadless acres have been lost to development (such as logging roads) in the past 25 years. Therefore, it is critical to determine the degrees to which native trout are linked to undeveloped areas on lands managed for the American people by the United States Forest Service, Bureau of Land Management, and National Park Service. (Organization, Laramie, WY - #A30488.54110)

### 619. Public Concern: The Forest Service should reintroduce and protect predators.

PREDATOR reintroduction and protection should be a management objective. (Individual, San Jose, CA - #A6276.53200)

#### GRIZZLY BEARS

Please support the past efforts on saving roadless areas and the introduction of grizzlies into those areas suitable. (Individual, Plains, MT - #A5801.10150)

### 620. Public Concern: The Forest Service should make the black bear the national wild animal.

Proposal: Make our “Black Bear” our national wild animal, similar to our national bird the “Eagle.” This would be a start toward a civilized society in general. (Individual, Tacoma, WA - #A8589.53000)

**621. Public Concern: The Forest Service should prohibit the killing of black bear.**

I ask that our black bear “killing”, not “hunting” the natural animals of our forests, be eliminated!! Why? should we kill our innocent animals, except for meat! Yearly, like yearly having new cars? We are ridiculous inhabitants of this precious God Given Land, and need to change!! European countries have their 1500 years of faith of enlightenment of reason. What ages do we have or will have? (Individual, Tacoma, WA - #A8589.53000)

**622. Public Concern: The Forest Service should prevent wolf populations from expanding.**

With that in mind lets think about not letting the wolves get our of hand either. They do major destruction to wildlife as well as farm animals and endangerment of small kids recreating in outdoors when their numbers get too high and we are nearing that in the area I reside in. (Individual, Medford, WI - #A6035.53200)

Get rid of the wolves. Its a joke that they are listed as endangered. Alaska and Canada are over run with them and they have taken their toll on our big game herds here in Idaho. (Individual, Carmen, ID - #A7972.53000)

**623. Public Concern: The Forest Service should consider that the reintroduction of coyotes, wolves and bears to certain areas is upsetting the balance between people and animals.**

The reintroduction of coyotes, wolves and bears to certain areas is upsetting the balance that was established with the people population increase. (Individual, Klamath Falls, OR - #A8809.20000)

**624. Public Concern: The Forest Service should use elk as a management indicator species.**

The CERT [Clearwater Elk Recovery Team] believes that any resulting USFS roadless policy should be based upon a heavily weighed, local input process that develops recommendations to the cyclic revisions and infrequent amendments to individual National Forest Plans. In the Clearwater Basin, elk must continue to be a major indicator specie both in National Forest Plan and in the reality of accomplished, active forest management. (Organization, Moscow, ID - #A15318.53300)

Place a high priority for creating and rejuvenating elk forage in the Clearwater and Nez Perce National Forests and throughout Idaho. Put action in maintaining elk as a major indicator species in the Idaho National Forest Plan through active forest and rangeland management. Give your service the ability to manage its forests on a site-specific basis that is locally advised. (Organization, Viola, ID - #A23458.53300)

## *Funding*

**625. Public Concern: The Forest Service should more effectively utilize funds earmarked for protection of wild horses.**

We feel the money being used to protect wild horses could be better utilized. (Individual, Troy, OH - #A10718.17100)

**626. Public Concern: The Forest Service should recognize that building roads in the Skagit River watershed would route funds away from salmon recovery efforts.**

In Washington, the Forest Service is working with the Skagit Watershed Council (of which The Nature Conservancy of Washington is a founding member) to procure state Salmon Recovery Funding Board monies to protect endangered salmon runs. The construction of additional roads in the Skagit River watershed would counter the positive work that the Forest Service is doing, and could route salmon recovery funds away from other critical salmon protection and restoration projects in order to mitigate the harmful effects of federal roads. (Organization, Seattle, WA - #A21904.17240)

***Effects of Activities/Disturbance on Wildlife*****627. Public Concern: The Forest Service should recognize that wildlife is resilient to Active Management.**

In seeking to provide more habitat for wildlife, the motivations of the Forest Service are laudable. However, the strategy proposed for doing this is flawed. Wild creatures are more resilient than most people would like to admit. Peregrines inhabit the heights of office buildings in Detroit. Cranes, herons and hundreds of other species live in the Detroit River, surrounded by industry. (Individual, Palisade, CO - #A20897.53100)

**628. Public Concern: The Forest Service should recognize that roads do not harm wildlife.**

A common objection to roads is that they will negatively impact wildlife. Here are several examples to show that wildlife don't seem to care.

Several years ago I visited Glacier National Park and drove through the park on the Going To The Sun Highway like thousands of other tourists do every year. This is a road that could never be built in today's political climate since it goes through a wilderness. Yet near the highway were many mountain goats undisturbed by the tourists stopping to take their pictures.

In Jasper, Alberta, elk regularly wander through the town and eat the people's gardens, as deer do in many western Oregon towns.

I have a picture on my desk of three grizzly bears walking on the Alaska pipeline. Opponents of the construction of this pipeline cited harm to wildlife as a major reason not to build it. Apparently the bears were not solicited for input. (Individual, Springfield, OR - #A21815.53000)

Avoid all road and trail closures based on wildlife concerns except where negative wildlife impact can be specifically identified and documented. Motorized use on existing trails has little or no verified effect on game animal welfare. In fact, some of the areas more intensely visited by motorized visitors have experienced significant increases in wildlife populations; further substantiating the fact that motorized recreation does not in itself create a significant impact on wildlife. (Organization, Helena, MT - #A13226.91211)

**FISH**

The argument that dust from unpaved roads is settling in streams and causing difficulty for spawning fish, including salmon and steelhead is laughable. There was a preceding generation in Idaho's mountains and valleys that only had unpaved roads and trails, and may have been at times more numerous than now, the dust of which, (horses, wagons, larger than herds of cattle/bands of sheep) created clouds of dust, and yet 35 years ago Idahoans could catch plenty of salmon and steelhead and 15 trout per day, plus bag more than one deer in several areas. (Individual, Bellevue, ID - #A30175.54000)

**THE DESERT TORTOISE**

I've spent a good bit of time north of Barstow and, for awhile, this area was closed off because off-road drivers and prospectors posed a danger to the desert tortoise. Off-road drivers would run over them and

prospectors dug holes for them to fall into that they couldn't get out of. In at least six years of hunting for gold in this area, I have only seen one dead tortoise and its remains were under a bush. I've never seen one that was run over or trapped in a hole. In fact, the biggest tortoise that I've ever seen was going from tailing pile to tailing pile, eating new growth and ignoring the old growth between the piles. (Individual, No Address - #A8252.53200)

#### **ROADS DO NOT IMPEDE WILDLIFE MOVEMENT**

Grizzly bears do cross roads—even oiled ones, deer, elk and moose become suburbanites witnessed by the number of road kills. All these animals have four legs and can and do skip into the next draw or over the next ridge when a vehicle of any kind approaches. (Individual, Whitefish, MT - #A5102.53000)

#### **629. Public Concern: The Forest Service should recognize that vehicles do not disturb wildlife.**

As for the claim that vehicles of any type disturb the wildlife just doesn't hold water. I have [lived] in the foothills and mountains of Colorado for the last 35 years. In most areas there is more wildlife living among the people and homes than there ever was, I see foxes and deer on a daily basis, bears on occasion, have heard mountain lions (know many people who have seen them), bobcats, coyotes. When first moved here we almost never saw this wildlife (including the deer that we only saw occasionally), so that the wildlife has a problem with people again doesn't hold water. The only areas that I have seen a drop in the amount of wildlife that can be seen regularly is in some of the western slope areas that have been (in my opinion) over hunted (and yes I am a hunter but have quit hunting deer due to this problem and probably not even hunting elk this year). As for the argument that there are more sightings of wildlife due to more people, maybe but if the animals have a problem with people why haven't they moved to more remote areas (and there are still large areas without homes or people in Colorado, Wyoming, etc.)? (Individual, Boulder, CO - #A4480.53100)

#### **630. Public Concern: The Forest Service should recognize that the impacts of road fragmentation are greater than the impacts of fire.**

The vast majority of birds and small to mid-size animals that went extinct in the last 450 years lived on islands, and paving roads through an ecosystem slices and dices the entire system into islands. Slapping a road through an ecosystem is far more deadly than fire. In a few years, an ecosystem rebounds from fire. Fire is a natural part of the ecology of Earth but not so a concrete road. A paved road will always kill, and kill, and KILL. An ecosystem and biological diversity will rebound from fire, but a paved road will always be an EARTH-KILLER! Forever! **Every yard of ecosystem paved and slathered over is another yard of dead planet.**

EXTINCTION IS FOREVER and paving roads causes extinction! "THE MASS EXTINCTIONS WHICH THE EARTH IS CURRENTLY FACING IS A GREAT THREAT TO CIVILIZATION SECOND ONLY TO THE THREAT OF THERMONUCLEAR WAR." \*NATIONAL ACADEMY OF SCIENCES. (Individual, No Address - #A18867.50100)

#### **631. Public Concern: The Forest Service should not use elk forage enhancement as an excuse for timber removal.**

No amendments to this **Roadless Area plan** should allow for **helicopter-entry logging or experimental thinning studies**, NO PATCH CLEARCUTS IN THE NAME OF ELK FORAGE ENHANCEMENT or **salvage logging**. We already have plenty of lands in which we can conduct these activities. (Organization, Albany, OR - #A19057.90520)

#### **632. Public Concern: The Forest Service should address the effects of fire on fisheries.**

The fires that burned in Montana in 2000 and now in 2001 have been devastating to fisheries, particularly bull trout and cutthroat trout spawning streams of the Bitterroot National Forest and the Big Creek drainage of the North Fork of the Flathead River. (Business, Kalispell, MT - #A29034.54100)

**633. Public Concern: The Forest Service should allow trapping as a wildlife management tool.**

I also support trapping on national forest lands as a wildlife management tool. (Individual, Fort Morgan, CO - #A19961.91410)

**Positive Effects****634. Public Concern: The Forest Service should allow timber removal.****FOR THE BENEFIT OF WILDLIFE**

My primary reason for opposition is that it creates a problem with the necessary timber management required for good wildlife management. A diversified forest benefits game management while providing economic development opportunities. As an avid outdoorsman I have seen firsthand the benefits to wildlife from timber harvesting. A timber harvest (i.e. clearcut) properly managed by wildlife biologists is probably the most important single factor beneficial to the greatest number of species of wildlife in a timbered region. This provides a year round food source and shelter/cover for nesting, protection from cold winds and severe weather, and escape from predators. The forest of varied age growth among hardwood mast producing trees will increase the likelihood of mast production in any given year as often the younger trees will produce even when the older larger trees do not. The new growth in a young (2 to 10 year old) clear cut area provides browse and diversity of plant life throughout the entire year that is very beneficial to deer, bear, turkey, grouse, squirrel, and many other species including those that prey on the former. In a mature forest mast producing trees generally bear mast only every few years. This is a bonanza for the wildlife that rely on this food source when it occurs, but when it is gone, often in a matter of several weeks, there is very little to eat for the next couple of years.

This is another point where the importance of a properly managed harvesting operation is necessary. A young forest will likely contain numerous species of mast producing trees and plants that produce annually and at different times within the same year providing a reliable food source for an extended period of time. Some of these additional species include grapes, dogwood trees, wild cherry trees, blackberry vines, sassafras, numerous weed species providing seeds and browse, etc. While these species of plant life will likely be eliminated as the young forest matures back to its original make-up, it is of great importance to allow this diversity to flourish for the few years that it can. Then hopefully there will have been other harvest areas close by that are in this age bracket that will then be providing for this necessary source of food and cover. Properly managed, we will have rotated throughout the forest region and will be ready to harvest this same area in another 100 years. (Individual, Roanoke, VA - #A11780.30100)

**TO ENCOURAGE THE GROWTH OF HUCKLEBERRIES FOR GRIZZLY BEARS**

Grizzly bears have become increasing problems in this area of northwest Montana. Their habitat management direction has become hands-off, de facto wilderness with no vegetation management even though the Forest Service acknowledges that logging is a tried and true method to improve grizzly habitat. Our Grizzlies are not and cannot eat security. Instead they have been relegated to putting on calories by eating garbage, dog food and birdseed in housing areas and towns because their normal food sources are being crowded out in dense, unhealthy forests.

Huckleberries, their normal food source, need sunlight and forest openings for regeneration and berry production. This valuable plan was the subject of a five-year study, *The Ecology and Culture of Montana Huckleberries: A Guide for Growers and Researchers* (by Dr. Nellie Stark and Stephen Baker at the Montana Forest and Conservation Experiment Station School of Forestry, University of Montana) funded in part by the U.S. Forest Service. It needs sunlight, does not survive fire well because of its shallow rhizomes that spread in woody debris, and the researcher estimates that conditions for germination from seed may only exist once every seventy years. Unlike most tree seedlings, huckleberries do not do well in a nursery setting either. There is a great tragedy playing out in the survival of bears and huckleberries because our forests are deteriorating with the lack of active management. (Business, Kalispell, MT - #A29034.53100)

**635. Public Concern: The Forest Service should allow thinning.****TO PROMOTE PLANT GROWTH AND FEED FOR WILDLIFE AND BIRDS**

In regard to making more of our national forests roadless, I believe the 24.2 million acres on which new roads are already banned is enough of the 58.5 million roadless acres. With what you consider marketable timber on only 9 million of those 34.3 million acres, that small percentage should not have an adverse effect on the forests. Thinning would undoubtedly help promote plant growth for the animals and birds to feed on. (Individual, Big Timber, MT - #A5630.30530)

**636. Public Concern: The Forest Service should provide retaining pools when installing culverts.****FOR WILDLIFE IN THE DRY SEASON**

When placing culvert pipes, consider building a reasonable size water retaining pool on the upper side, or lower, for pump chance and for the wildlife in the dry season. (Individual, Cottage Grove, OR - #A11071.53000)

**637. Public Concern: The Forest Service should retain dams and fix fish passage ladders.**

Keep all dams on all rivers. Just fix the ladders to help fish upstream. (Individual, Grants Pass, OR - #A11357.54100)

**638. Public Concern: The Forest Service should recognize the beneficial impact of ranch management on wildlife.**

Ranchers develop water ponds—provide salt and supplements that also help wildlife. (Individual, Decatur, IL - #A11051.53000)

**639. Public Concern: The Forest Service should recognize the benefits of fire, disease, and insects to bird species.**

Many bird species that are declining rely on fire, disease and insects. In particular, Lewis's Woodpeckers, Three-toed Woodpeckers, Black-backed Woodpeckers, Olive-sided Flycatchers and Townsend's Solitaires rely on fire to create their habitat. (Organization, Helena, MT - #A20874.53100)

***Negative Effects*****640. Public Concern: The Forest Service should address the negative effects of roads on wildlife.**

Roadbuilding also adversely impacts forest health by:

Harming wildlife through the displacement of species sensitive to disturbance or dependent on forest interior habitat. For example, species such as grizzly bears, wolves, and elk avoid otherwise suitable habitat near roads.

Roads create barriers to the movement of many species. Small animals such as salamanders, frogs, and mice will rarely cross roads or are killed by vehicles when crossing.

Roads are barriers to dispersal, isolating populations on one side of the road from those on the other. This results in the loss of gene flow between populations and the potential vulnerability of some species to inbreeding or environmental catastrophes. (Individual, Anchorage, AK - #A20934.53110)

Keep the wild in the last remaining wildlands of this nation. We need to think of these places as interconnected units they need to remain protected fully so that the animals that call them home can continue to exist. It has been shown that roads no matter how rural have had a significant impact on the migration of wildlife and that conversely has an impact on their populations. The Canadian national

parks have already seen a decline in predator populations in wildlands where roads bisect the tremendous preserved acres. We cannot continue to make the same mistakes and we need to view all these areas and the surrounding areas as important areas for wildlife. (Individual, Wilmington, DE - #A4268.50520)

Roads are a specific type of disturbance that fragment the landscape for a range of sensitive species, and create zones of elevated mortality for others. The critical values protected in roadless areas are landscapes where near-natural disturbance regimes prevail: they provide an ecological benchmark for scientific research, an emergency backstop against catastrophic ecological change, and a critical source area for metapopulations, from which regenerating landscapes can be recolonized. (Individual, No Address - #A4777.50520)

As a biologist working in the Yellowstone-Teton Range area. I fully support protection of roadless areas. These areas are extremely important as a refugia for sensitive wildlife. Roadless lands provide many hazards for wildlife, including poaching, excessive hunting, illegal logging, litter, dumping and too much human use. (Individual, Victor, ID - #A5336.53000)

80% of all the wolves killed in one of our largest national parks are killed because of the railroad running through it. A moose or deer is struck and killed by the train. Subsequently, a wolf comes to eat the moose or deer and the wolf is killed. Roads running through our pristine wilderness areas would cause the same problem. It would be cruel to and unsafe for the wildlife in these now roadless areas. Please do not allow roads. (Individual, Holden, MA - #A6912.90130)

#### **ON NON-NATIVE BIRDS AND PLANTS**

Working in the Colorado and New York State Breeding Bird Atlases, I got to see first hand how destructive roads in our forest are on introducing new species of birds (cowbirds and starlings etc.) and foreign plant species (Russian Knap weed and thistles etc.). Also forest are fragmented, streams and air are polluted. (Individual, Franktown, CO - #A5142.50000)

#### **DECREASED POPULATION VIABILITY**

In the Interior Columbia Basin Ecosystem Management Plan, USFS, USFWS and BLM scientists found that roads directly impacted the current and future population viability of 28 of 78 (36%) high priority terrestrial vertebrate species and 17 of 31 (55%) of the very highest priority species brought forward for the Supplemental Draft EIS. The impacts of roads on these species were analyzed and are part of the ICBEMP record and publications. This undeniable impact of roads on wildlife can only be addressed by protecting roadless areas and removing a large percentage of existing roads. (Individual, Boise, ID - #A23621.53000)

### **641. Public Concern: The Forest Service should address the negative effects of roads on fish.**

Roads can bring changes to water volume, speed, temperature, which can negatively affect a host of animals including trout and salmon. (Professional Society, No Address - #A26799.50000)

#### **SEDIMENTATION**

Yellowstone, Bonneville, Colorado and Snake River Cutthroat trout depend on clean streams that flow through roadless areas for their survival. Roads are the primary source of sedimentation in our national forests, causing the decline of fisheries and harm to other aquatic species. (Individual, Jelm, WY - #A27247.54000)

#### **LOSS OF SPAWNING HABITAT**

Other aspects of the effects of roads on salmon and trout streams remain to be studied—perhaps studies are underway. Important among these is the effect of erosion as the result of the construction and existence of roads. Nearly all of the Tongass consists of steep terrain. In combination with high rainfall, the inevitable effect is erosion, to the detriment of good salmon spawning gravel. Of course the logging

also adds to that erosion: since 1990, 100-ft. buffer strips have been required along major streams, but no such protection is required for upper tributary streams. These streams which send debris and mud onward into the lower fish-bearing streams, are becoming more at risk as the logging is more often forced into the upper elevations now that the lower elevations have been logged. Moreover, the lesson has been learned elsewhere that 100-ft. buffers are not sufficient. (Individual, Gustavus, AK - #A19067.54100)

Roads act as stream runoff collectors that direct high flows, sediment, and other non-point pollutants into streams, covering spawning habitat and reducing rearing capacity for salmonids. Most roads parallel valley floors, often with little or no stream buffer. When a stream naturally meanders towards a roadway, road engineers armor the eroding stream bank with rip-rap, channelizing the stream and further degrading fish habitat. (Individual, Juneau, AK - #A23242.54100)

#### **STOCKING NON-NATIVE SPECIES, ACCESS BY LIVESTOCK, OVERFISHING, AND DISEASE TRANSMISSION**

As part of the efforts to protect native trout and their habitat, the Campaign evaluated the relationship between public land roadless areas and existing native trout populations. Roads are a significant cause of trout habitat damage and water quality degradation. Roads also facilitate stocking of non-native trout and other fish species, access by livestock, overfishing, and disease transmission. Unfortunately, like native trout, roadless areas are a diminishing resource on the public lands. In many instances, roadless areas outside of wilderness and national parks have not been protected from on-going development. (Organization, Laramie, WY - #A30488.54100)

#### **642. Public Concern: The Forest Service should close roads.**

##### **TO MAINTAIN UNFETTERED MIGRATION ROUTES FOR WILDLIFE**

It is incredibly important that what little unfettered migration routes for animals are left be kept intact, or even improved upon by closing down existing roads and letting them go back to nature. (Individual, No Address - #A1692.53000)

##### **TO INCREASE ELK POPULATIONS**

I worked on the Kaibab National Forest which was one of the forerunners in closing roads and not making new ones. The benefits that we saw were innumerable and spanned across several interests, not just for “environmentalists”. The most notable effects known by people in the region was the quality of the wildlife, especially seen in the Trophy Elk taken from this area by hunters, which was due solely in part to the Kaibab’s policy on roads. (Individual, Glendale, AZ - #A1908.53300)

#### **643. Public Concern: The Forest Service should address the negative effects of off-road vehicles on wildlife.**

Motorized off-road vehicle travel should also be expressly prohibited. The negative impact of off-road vehicles (ORVs) on wildlife is becoming ever more apparent, particularly as off-road vehicles become faster, more common, and able to conquer more terrain. ORVs provide access for hunters, poachers, and others who might intentionally or unintentionally disturb wildlife. They can transport disease, fungi, and non-native species. They generate extreme noise and air pollution. Overuse of certain areas creates de facto roads that are often in inappropriate locations and can lead to severe erosion, wildlife impacts, and scars on the landscape. The roads and snowmobile trails used by ORVs can provide access, in the form of a trail or hard-packed snow, into previously inaccessible areas for not only humans but also for some wildlife. For example, coyotes and bobcats can follow hard packed snow into areas where they can compete with the lynx, which is otherwise better adapted to deep snow. (Organization, Washington, DC - #A18031.90110)

#### **644. Public Concern: The Forest Service should address the negative effects of inadequate stream culverts on fish passage.**

Many aspects of roads need to be considered. One of the most important impacts is on streams that are crossed by roads. Past road-building practices have left many culverts over anadromous fish streams

inadequate for fish passage. Attention to this aspect of road building is crucial for Southeast's commercial, sport, and subsistence fisheries. (Individual, Petersburg, AK #A21351.54100)

The roads that have been built at enormous cost have not been environmentally benign by any measure: the Forest Service and Alaska Department of Fish and Game report that as many as 66% of logging culverts over anadromous fish streams, and 85% of resident fish stream crossing are not adequate for fish passage. (Organization, Reston, VA - #A21625.54100)

The Forest Service has failed to adequately maintain the logging roads already constructed in the Tongass, thereby blocking salmon passage, fouling spawning areas and degrading water quality with sedimentation. (Elected Official, Tenakee Springs, AK - #A3358.54100)

#### **STOP CONSTRUCTING NEW ROADS UNTIL EXISTING ROADS AND CULVERTS ARE REPAIRED**

Tongass streams spawn 80% of all salmon in Southeast Alaska yet, you yourselves report that as many as 66% of logging road culverts over anadromous fish streams and 85% of resident fish stream crossings are not adequate for fish passage. The Alaska Dept. of Fish and Game agrees. We suggest that if the Forest Service cannot maintain existing roads and lacks funding to correct blocked culverts, it should stop building new roads. (Director, Tribal Resources, Hoonah, AK - #A3024.54100)

Commercial fishing, the area's largest private employer, requires the pristine Tongass streams for salmon to spawn and for young salmon to grow. But, most of the existing logging road culverts do not allow passage of resident salmon, due to blockages, lack of maintenance, or poor design. The Forest Service should fix these roads, not build more that will just block more fish and lead to the decimation of the Tongass salmon population. We need to learn from the mistakes made in the Pacific Northwest and protect the habitat needed for healthy salmon runs. (Individual, Everett, WA - #A4799.54100)

### **645. Public Concern: The Forest Service should prohibit all Active Management and Resource Use.**

#### **TO PROTECT WILDLIFE**

These areas are our remaining wild unprotected areas of the United States; these areas especially in my region (northeastern Washington and northern Idaho) are home to some of the nations major endangered species, Mountain Caribou, Grizzly Bear, Bull Trout, Gray Wolf and Lynx. The only way I see any protection for these animals and for these remaining wild areas, is a roadless rule that does not allow for resource extraction of any kind. (Individual, Spokane, WA - #A820.53100)

### **646. Public Concern: The Forest Service should address the negative effects of timber removal on wildlife.**

#### **FOREST INTERIOR BIRDS**

In his letter calling for inclusion of a prohibition on logging and road construction in the final rule, Dr. David S. Lee, ornithologist and Curator of Birds at the North Carolina State Museum of Natural Sciences, confirms that forest interior birds are particularly sensitive to disturbances created by logging. . . . In the southern forests, which are critical neotropical migratory songbird breeding habitat and migration flyway, timber activities create edges which, particularly in eastern forests, facilitate cowbird parasitism of the nests of other birds. M. D. Baker and M. J. Lacki, *Short-term changes in bird communities in response to silvicultural prescriptions*, 96 *Forest Ecology and Management* 27-36 (1997). Research has found that this cowbird behavior has contributed to the population declines of many neotropical migrant bird species. See Id. and *see also* K. V. Rosenberg, J. D. Lowe and A. A. Dhondt, *Effects of forest fragmentation on breeding tanagers: a continental perspective*, 13 *Conservation Biology* 568-583 (1999). General nest predation rates in Southern Appalachian forest fragments has also been found to increase as forest fragment size decreases. A.J. Keyser, G. E. Hill and E. C. Soehren, *Effects of forest fragment size, nest density, and proximity to edge on the risk of predation*

to ground-nesting passerine birds, 12 Conservation Biology 986-994 (1998). (Organization, Charlottesville, VA - #A25689.53200)

### SALAMANDERS

As indicated by Dr. James Petranka in his letter to the Forest Service of July 12, 2000, salamanders provide “a compelling example of the need to prohibit logging in the roadless areas.” The Southern Appalachians have perhaps the greatest taxonomic diversity, density and biomass of salamanders in the world according to Petranka. And in order to preserve this biodiversity, roadless areas must be left relatively undisturbed. A recent study showed that clearcuts had a significantly lower abundance and fewer species of salamander compared to mature forest stands in the Southern Appalachians. J.W. Petranka, M.E. Eldridge and K.E. Haley, *Effects of timber harvesting on southern Appalachian salamanders*, 7 Conservation Biology 363-370, (1991). *Plethodon* salamanders, common to our region, have especially high mortality after development activities, because they have small home ranges and are unlikely to relocate to intact forests from logged areas. Id. At 363. The relatively common land salamander *Plethodon jordani*, an important part of the food chain of our southern forests, completely disappears from clearcut sites in the Southern Appalachians. A.N. Ash, *Disappearance of salamanders form clearcut plots*, 104 The Journal of the Elisha Mitchell Scientific Society 116-122, (1988). (Organization, Johnson City, TN - #A20341.53110)

#### 647. Public Concern: The Forest Service should restrict hiking in roadless areas.

##### IN AREAS WHERE CALVING OCCURS

When determining what restrictions are necessary, the forest must set new guidelines based on good, undisputed data. Perhaps . . . hiking should be banned in some areas where calving occurs. (Individual, No Address - #A29334.90110)

#### 648. Public Concern: The Forest Service should address the effects of fire on species extinction.

The loss of species to an agonizing death from fire is terrible. We do not know what unique species of life may be extinguished forever because of the fires. I recall that a unique tree in the Northwest is the source of Taxol, an important lifesaving drug. We have no assurance that a similar discovery may have escaped notice in the areas destroyed by fire. (Individual, South Royalton, VT - #A13393.50000)

## Wildlife Habitat

### Summary

**General Comments** – A number of respondents comment on wildlife habitat. Some assert that the Forest Service should protect roadless areas for habitat for various species, and that it should preserve fish and wildlife habitat as a priority. Some suggest types of habitat that would benefit from roadless area protection, such as wetlands, migratory bird habitat, interior species habitat, salmon and trout habitat, and wolf and fox habitat. Respondents also provide a wide variety of strategies for preserving habitat. Some of these strategies include reducing the effects of human encroachment, avoiding development of wetlands, retaining dead and downed trees, providing wildlife corridors between roadless areas, increasing elk forage, and allowing continued maintenance of wildlife habitat improvements.

Respondents also frequently discuss habitat fragmentation. Many request that the Forest Service address the negative effects of habitat fragmentation and also take steps to prevent it.

Respondents suggest prohibiting road building and protecting roadless areas to prevent fragmentation.

**Effects of Activities/Disturbances on Wildlife Habitat** – Some respondents believe that the Forest Service should allow various activities due to their positive effects on wildlife habitat. One organization asserts that some even age management should be occur in order to maintain habitat diversity and support the species of disturbance ecosystems. Some suggest allowing limited timber removal, the use of fire to clear out old growth, dredging, grazing, and road building to benefit wildlife habitat.

In contrast, other comments on this topic conclude that certain activities have negative effects on wildlife habitat. Respondents state that the Forest Service should prohibit mining, thinning, developed activities, and road construction in order to protect wildlife habitat. Some also add that the Forest Service should address the negative effects of roads on specific wildlife habitat such as American marten habitat and beaver habitat.

### *Wildlife Habitat General*

#### **649. Public Concern: The Forest Service should manage forests for habitat rather than for “values.”**

If the water is clear enough for fish survival, the fuels discontinuous enough that fires can be limited within reason, there’s huntable game, and resource producers can still produce, that’s good enough for me.

I really don’t give a rat’s fanny about “values,” especially the sort of unquantifiable “non-use values” so popular with the preservationist crowd. I fail to see the “value” in an unmanaged forest that can go up in flame at any time, wrecking habitat from ridge to ridge at a time when there isn’t a hell of a lot of habitat to spare in some cases. I would rather have partly-functional habitat than no habitat at all. Of course, if the habitat goes up, then the species become MORE endangered and then the eco-lawyers can get LOTS of “value.” (Individual, Whitefish, MT - #A20672.50000)

#### **650. Public Concern: The Forest Service should more adequately describe desired future conditions to reflect wildlife habitat.**

The Forest Service has not adequately described the desired future condition (DFC) of Roadless Areas. We believe the future condition of Roadless Area should be characterized predominantly by remote (backcountry) landscapes where ample habitat exists to support a rich diversity of wildlife and other natural resources, as well as the type and quality of recreation that depends on serene, natural surroundings. The FS, however, must balance the demand for remote landscapes against the need to manage habitats for wildlife, water quality, and fire. Data clearly shows that mule deer and elk need the security provided by wild areas without much roading, but it is the shortage of managed habitats in these remote landscapes that limits population size, distribution, and health of these and many other species. (Organization, Washington, DC - #A21762.50000)

#### **651. Public Concern: The Forest Service should consider the size of inventoried roadless areas.**

##### **TO MAKE SURE THEIR SIZE IS CONSISTENT WITH THE HABITAT REQUIREMENTS OF INTERIOR-DWELLING SPECIES**

The sheer size of an IRA parcel should also be considered to make sure it is of a size consistent with the habitat requirements of interior-dwelling species which are being promoted. This is by no means an all inclusive list. A set of national criteria needs to be created for evaluating IRAs and those criteria should be applied through the local planning process. (State Agency, Madison, WI - #A28775.45330)

## 652. Public Concern: The Forest Service should address the negative effects of habitat fragmentation on wildlife.

In both the Tongass and elsewhere (Pacific Northwest, Amazon), forest fragmentation has been found to have detrimental effects on populations of individual species such as Sitka blacktailed deer and on overall species diversity and abundance. Road construction contributes to these effects by both directly increasing mortality (hunters, trappers, and drivers use roads whether or not you close them) and by facilitating further fragmentation of habitat (timber sales follow roads, roads themselves can pose significant barriers to dispersal in some organisms). Recent research in the Tongass indicates that the fragmented landscapes produced by logging and road-building cause a significant DECREASE in avian community diversity compared to continuous old growth forest. (Professional Society, No Address - #A26225.53100)

**Habitat Fragmentation**—Roads break up local populations of smaller animals and plants, potentially leading to local extinctions and disruption of behavior and movement patterns of large animals, such as elk and pronghorn antelope. (Professional Society, Lincoln, NE - #A19374.53110)

### BEARS

My concern was and still is for wildlife habitat—especially Grizzly Bear Habitat. Rooding makes it difficult for the bears to move to new food sources and increases the likelihood of Bear/Human confrontations. Rooding definitely diminishes the Bear's habitat. (Individual, Riverton, WY - #A20861.53110)

## 653. Public Concern: The Forest Service should protect roadless areas.

### FOR WETLAND SPECIES PROTECTION

Let's not forget that the eastern Delta is one of the world's most important wetlands (according to Ducks Unlimited and others) in terms of migratory and breeding birds; that this is the largest wetland on the Pacific coast of North America; and that still contains healthy populations of salmon. At a conference held in May 1999 in Cordova, USFS administrators and researchers, and researchers from academia, recommended that Cordova become the site of a major wetland research facility to study this intact, functioning wetland so that the research could be used to help restore damaged wetlands and Pacific salmon stocks in the northwest U.S. None of this proposed development and research depends on roads and, in fact, could be harmed by more roads into the region. (Individual, Cordova, AK - #A8044.53100)

### FOR ELK REINTRODUCTION

The state is reintroducing elk into this area and has plans for introducing other species. These animals need huge expanses of roadless areas that are rare in this area. We should not destroy those that we currently have. (Individual, Soddy Daisy, TN - #A13508.53100)

### FOR MIGRATORY BIRD HABITAT

Numerous bird species, particularly migratory birds, depend partly or entirely on roadless forests for breeding, feeding, and resting on their migratory journeys. Cerulean, Cape May and black-throated green warblers, wood thrushes, and ovenbirds are all birds that need interior woodlands to thrive. Edge species that impact interior birds through predation, competition, and parasitism include crows, jays, cowbirds, and raccoons. There is some indication that unroaded tracts of forests 1000 acres or less can provide enough interior habitat to suit at least some interior birds, which is one of the reasons parcels of this size should receive immediate protection under the roadless policy. (Organization, Washington, DC - #A18031.53100)

### FOR INTERIOR SPECIES HABITAT

The characteristics that make roadless areas so important are largely a factor of their size. One of the most important roles roadless forests play is a barrier to predators and competitors better suited to the forest's edge. Roads provide access for these non-interior species to forests that were previously off-limits to them, where they can wreak havoc on susceptible plants and animals of forest interior. A resulting change in plant composition may reduce or eliminate the food or habitat relied on by forest-

interior animals. Diseases, fungi, non-native species, and pests can also be kept at bay by deep, unbroken forests. Roads, clearcuts, and other openings also change the climate of a forest, for as far as 500 feet or more into the adjacent forest. Openings in the trees allow more wind, light, and noise to enter. The result is often a warmer, drier forest that may be uninhabitable for interior species, suitable for edge species, or both. (Organization, Washington, DC - #A22129.50520)

The roadless areas provide abundant and diverse values, but first and foremost emphasis should be placed on preserving areas that provide a template and source of information for research regarding biological resources. Roadless areas are particularly important in this context because they are relatively unfragmented and can provide large amounts of interior habitat relative to edge, and this condition is becoming extremely rare in the landscape. In addition, these areas provide valuable wildlife habitat and water protection benefits that are challenging to restore or replace. (Association, Minneapolis, MN - #A19249.45100)

#### **FOR KENAI PENINSULA HABITAT**

While peninsula brown bear habitat effectiveness has been reduced by 70% on CNF lands, adjacent habitat on the Kenai National Wildlife Refuge (KNWR) been reduced by thirty percent (KNWR). Most management activities have occurred in the lower elevations, fragmenting valleys and wildlife travel routes. However, under the preferred alternative management activities will continue to change the distribution of certain species across the forest by continuing to concentrate activities in these valleys. The Kenai song sparrow and seven subspecies of mammals are restricted to the Kenai Peninsula (3-58). Ironically however, the preferred alternative places the most change, with the least amount of protections here.

Several telemetry studies give compelling evidence to the island-like geography of the Kenai. There is little to no genetic interchange between the Kenai and mainland Alaska for some wildlife populations, such as brown bears, lynx and wolves. All of these species are on Federally listed in the lower '48 due to isolation, habitat fragmentation, development and human disturbance, conditions not unlike those that exist on the Kenai. The geographic land bridge, which enable genetic interchange, was severed this summer with the Whittier access road. It took wolves nearly 50 years to naturally economize the peninsula after being eradicated in the early 1900s. Caribou had to be reintroduced after their decimation, never naturally colonizing (KNWR). Human impacts were much lower at the time of colonization than they are now. Future management of CNF lands will determine the outcome for some of these species. The preferred alternative must permanently protect habitat of critical importance, especially for those species, which may be isolated. WE strongly recommend coordination with federal landholders that share CNF boundaries, such as the Park Service and Fish and Wildlife. (Organization, Anchorage, AK - #A23038.53100)

#### **FOR CLEARWATER BASIN HABITAT**

Studies by Carroll, Noss, and Paquet (2000) show the Clearwater Basin wildlands to be the most important areas for carnivores in the US and Canadian Rockies. The roadless areas provide clean water and spawning grounds for native fish and the unfragmented, large tracts of forests for wildlife such as grizzly bear, wolf, goshawk and pine marten. Forest Service studies have found streams and rivers are healthier in roadless areas than in roaded, logged places. (Organization, Moscow, ID - #A22654.50000)

#### **TO PRESERVE HABITAT FOR INDIGENOUS WILDLIFE**

An emphasis should be made to assure that sizable habitats are provided for the indigenous wildlife of America, quite apart from its function to people. Once sufficient land has been permanently set aside to assure the continuation and development of these species in isolation, then there is more flexibility with remaining public lands. At this moment, more land, not less, needs to be kept and conserved in roadless areas. (Individual, Lexington, KY - #A1077.30200)

#### **TO PRESERVE SALMON HABITAT**

Healthy salmon runs are the backbone of the ecosystem and economy in Southeast Alaska. In contrast to the rest of the Pacific coast, millions of salmon still return to the rainforest streams each fall. Large trees along rainforest streams provide critical fish habitat. They help maintain steady water temperatures by

providing shade and maintain flow rates by controlling runoff. Woody debris from dead trees helps preserve stream structure and nutrient supplies important for juvenile salmon. High-quality, intact forest is essential for continued wild salmon runs. (Organization, Nevada City, CA - #A4941.54100)

The Tongass still has healthy salmon runs. More roads will jeopardize these salmon stocks which will result in ESA listings and ruin a sustainable way of life for many people in the SE Alaska. (Individual, McKinleyville, CA - #A1269.20222)

#### **TO PRESERVE TROUT HABITAT**

Many trout populations, like bull trout and most cutthroat trout populations, are severely fragmented and depressed. Much historic habitat is degraded, rendering all remaining habitat critical to native trout persistence. High quality habitat is rare. Any further degradation increases likelihood of trout extirpation. These conditions make roadless area protection essential to protecting and restoring trout. In a study of the role of Congressionally designated wilderness in conserving aquatic biointegrity, and sensitive species, researchers found that watersheds containing wilderness scored higher for aquatic biointegrity indicators. This study used road density among other factors as a measure of predictors of biointegrity; citing other studies that suggest that scientists can actually use roads as a catchall human disturbance indicator. Bull trout are exceptionally sensitive to direct, indirect, and cumulative road effects. Bull trout strongholds occur in areas with road density of about 0.4 miles per square mile of land area, but when road density increases to 1.7 miles per square mile bull trout are not found. The study found that wilderness areas are important areas of biointegrity in western Montana and given their importance and rarity, unprotected areas with good aquatic biointegrity merit permanent protection.

Further, recent studies have shown that the majority of isolated populations do not have adequate space for their long-term persistence. Scientists have estimated that, to maintain a cutthroat population in the long term, cutthroat might need two to twelve miles of occupied stream habitat. Few populations are left that occupy this much habitat. Existing populations are at short-term extinction risk from fires, floods, toxic spills, and non-native fish stocking.

High quality habitat for most trout populations is rare. High quality habitats in roadless areas are like islands in an ocean of degraded habitat. (Organization, Laramie, WY - #A30488.54110)

#### **TO PRESERVE TROPHIC WEBS**

The more habitats we destroy for all the animals living here the less chance they have to survive. Even small insects who get overlooked, if their habitat goes, then what will the birds, frogs and fish eat? We have the power and the obligation to help protect these ecosystems. (Individual, No Address - #A3887.50510)

Numerous studies in the rainforests of South America have shown the problems that occur when forests are fragmented. Intrusion of non-forest plant species and decreases in viability of animals at the top of the food chain are the two most obvious examples. (Individual, Tulsa, OK - #A1324.50520)

### **654. Public Concern: The Forest Service should preserve fish and wildlife habitat as a priority.**

PRIORITY IS THAT WILDLIFE HABITAT BE PRESERVED! (Individual, No Address - #A584.50000)

#### **BY REDUCING THE EFFECTS OF HUMAN ENCROACHMENT ON WILDLIFE HABITAT**

In these times of massive land development for urban use, it is clearly becoming a problem for a vast amount of wildlife. If this is not controlled in some areas where the wildlife can remain in its own (not intruded upon and changed for human use) natural environment then they simply do not stand a chance. So many people are against hunting and fishing and the numbers grow day by day. There is so much energy spent on saving this or that species but only as long as it does not impede human interests i.e.: money, huge fancy houses that are just show pieces of the rich (who do not appreciate wildlife anyway), resorts or anything that revolves around making a lot of money. (Individual, Billings, MT - #A4210.53000)

Human development of land here is fast deteriorating terrestrial and aquatic wildlife habitat. (Individual, Eagle River, WI - #A844.53000)

#### **BY AVOIDING DEVELOPMENT OF WETLAND SITES**

. . . Stop developing on wetland sites. These have become bird and animal sanctuaries near our cities. (Individual, Fort Wayne, IN - #A479.10111)

#### **BY RETAINING STANDING DEAD AND DOWNED TREES**

Studies recognize the benefits from standing and downed dead trees left by insect infestations. These trees provide food and shelter for wildlife. They form fish-spawning filter water for downstream use, and fertilize soils for future generations of forest life. (Individual, Missoula, MT - #A17952.60200)

Woodpeckers thrive in snag trees, naturally occurring in forests. Salamanders like the cool, rotting logs often found throughout undisturbed forests. (Organization, Washington, DC - #A22129.60200)

#### **BY ADDRESSING LANDSCAPE-SCALE HABITAT NEEDS FOR WILDLIFE**

Maintaining the population viability of far-ranging forest carnivores (including the grizzly bear, gray wolf, wolverine, fisher, pine marten, lynx, goshawk, etc.), reveals the need to consider landscape scale habitat needs. Core areas of relatively undisturbed habitats must be maintained. Linkages with other core areas must be established, providing sufficient habitat components so the linkages, or corridors, are functional for genetic interchange. Both core areas and linkages must be the focus of watershed rehabilitation and recovery . . . (such as road removal). Buffer zones around core areas must also be recognized in their contribution to habitat needs for these wildlife species. (Organization, Missoula, MT - #A613.53100)

#### **BY PROVIDING WILDLIFE CORRIDORS BETWEEN ROADLESS AREAS**

The USFS and other federal departments should work at establishing corridors between roadless areas to allow for wildlife and plant species to migrate between protected areas. (Association, Bonners Ferry, ID - #A20858.50520)

#### **BY PROVIDING WILDLIFE CORRIDORS IN EXURBAN AND SUBURBAN ZONES**

I ask that wildlife corridors in exurban and suburban zones be actively promulgated by the Forest Service. (Individual, Valley Center, CA - #A4316.53100)

#### **BY PROTECTING CRITICAL WINTER AND MIGRATORY RANGE**

Please also work to increase and enhance critical wintering and migratory habitat for our game animals. Urban and suburban sprawl takes an increasing toll of these critical areas each year. (Individual, Monument, CO - #A5764.53100)

#### **BY INCREASING ELK FORAGE**

Elk related business is a major economic contributor to Idaho. Our significant decline in Clearwater Basin elk population levels is tied directly to a lack of active forest management in the Basin. The creation of elk forage must come through proactive forest management utilizing the full range of forest management tools (timber harvest and burning) across the full breadth of the lands. (Organization, Moscow, ID - #A15318.53300)

#### **BY PROTECTING HIGH VOLUME CREEK HABITAT**

It is common knowledge that high volume creek bottoms and valleys also provide the best habitat for deer, salmon and other wildlife. Remaining areas should be kept roadless to protect these wildlife habitats. (Individual, Sitka, AK - #A15246.53100)

#### **BY IDENTIFYING AND MAPPING CRITICAL SALMON HABITAT**

Fast track a watershed analysis system to identify salmon stream habitat, as fisheries in Alaska is a tantamount economic, subsistence, and recreational resource many of us utilize. Identify and map "critical habitat," the land essential for the survival of the species. Use this identification to design a

strategy plan for wildlife protections while using alternative logging practices to minimize impacts. (Individual, Pelican, AK - #A26552.50000)

**BY DIVERTING FUNDING FROM STOCKING EFFORTS TO HABITAT RESTORATION AND ENVIRONMENTAL POLLUTION PREVENTION EFFORTS**

The forest service should continue with the restoration of fish habitat. Healthy stream and lake environments will promote strong and sustainable fisheries. Funding should be diverted from stocking efforts and placed on habitat restoration and environmental pollution prevention efforts. (Individual, Beverly Hills, MI - #A4756.50100)

**BY COMPENSATING CITIZENS WILLING TO SET ASIDE THEIR LAND FOR HABITAT**

. . . we can utilize PERC's recommendations, compensating Americans willing to set aside their land for habitat. "Market-oriented solutions are offered in the areas of endangered species, national monuments, grazing rights, recreation fees, and water management." (Individual, Jefferson, OR - #A777.54100)

**BY ALLOWING CONTINUED MAINTENANCE OF WILDLIFE HABITAT IMPROVEMENTS**

While we are disturbed and disappointed with the final rule adopted on January 11, 2001, we hope that the USFS will manage inventoried roadless areas to allow the continued maintenance of wildlife habitat improvements. Wildlife habitat improvements, especially wildlife openings in areas of extensive forestland, represent considerable investment of public resources by the VDGIF and the USFS. The areas not only provide important foraging habitats for white-tailed deer, black bear, and wild turkey, but also provide opportunities for the public to see the species. (State Agency, Richmond, VA - #A6048.53100)

**655. Public Concern: The Forest Service should provide habitat for umbrella species.**

Forests should be managed to provide habitat for game animals and umbrella species, and to provide a quality outdoor experience for many. Near-roadless areas have their place, but making Forest Service lands inaccessible to a substantial number of people should not be a policy of the Forest Service. (Individual, No Address - #A16447.50000)

**656. Public Concern: The Forest Service should provide natural habitat for wolf and fox.**

Allow wolves and foxes in natural habitat. (Individual, Atlanta, GA - #A873.53100)

**657. Public Concern: The Forest Service should address the loss of habitat through canopy closure.**

We are concerned that the presence or absence of roads in an area will overshadow the appropriate consideration of other values such as healthy forests and wildlife habitat. As an example, if an area is inaccessible for management, there may be a significant loss of important wildlife habitat through canopy closure. (Association, Portland, OR - #A19004.30200)

**THROUGH THE FOREST PLANNING PROCESS**

If an area is inaccessible for management, there may be a significant loss of important wildlife habitat through canopy closure. At the forest plan level, the analysis must consider these changes in wildlife habitat versus the need or desire to keep the area inaccessible. We do not feel that such analysis and consideration of site specific impacts can be done at the national level. (Association, Salem, OR - #A21754.45500)

**658. Public Concern: The Forest Service should prevent habitat fragmentation.**

**BY PROTECTING ROADLESS AREAS**

Looking at the whole picture, the least damaged public lands should be preserved in blocks large enough to preserve the native plants, animals and fish of the United States. A strong roadless areas will do this. I

can move and survive fine in another area. Marbled Murrelet, Northern Spotted Owls and Coastal Coho can't. (Individual, Deadwood, OR - #A881.50500)

#### **BY ESTABLISHING ROADLESS AREAS WHERE THE GREATEST CONNECTIVITY CAN BE ACHIEVED**

The current pattern of roadless areas is of course an artifact of chance, not of conscious design. In consequence, many ecologically important areas and types are under-represented or un-represented in the current universe of roadless lands (both inventoried and uninventoried). Even a policy that thoroughly protects all existing roadless areas will fail to achieve substantial and obvious ecological and biological benefits because no consideration will have been given to where the roadless areas *ought* to be. The ecological limitations of the current pattern of roadless areas can be remedied in part by creating new roadless areas where they are needed most - in the highly functional areas but lightly roaded areas, and in the areas where small amounts of road removal can achieve vast increases in connectivity. There are many such areas. In cooperation with our colleagues, Pacific Rivers Council has mapped areas of high aquatic integrity in much of the national forest system (including the Columbia Basin, the Sierra Nevada, and the Southern Appalachians) this has shown that protection of the existing pattern of roadless areas will only partly protect the remaining high quality diversity areas, since many high quality areas have been lightly compromised by roads. (Business, Coarsegold, CA - #A1589.50520)

#### **BY PROHIBITING ROAD BUILDING**

As is true of all ecosystems, high elevation ecosystems such as those in the Gunnison Basin-forests, shrub steppe, meadows and others-are easily damaged by human activity. In particular, ecosystems are damaged when the habitat they contain is divided into smaller fragments. The building of roads is a major cause of fragmentation. Fragmentation disrupts natural ecological interactions among species, as my research and other research at RMBL and elsewhere shows. The building of roads also damages ecosystems by serving as an entry for alien species to invade. Fragmentation and biological invasion are very serious threats in our area, as BLM and USFS scientists clearly recognize as well. (Individual, Crested Butte, CO - #A3696.50100)

Science uses a word that denotes ecosystem death and destruction: fragmentation. Slicing and dicing an ecosystem into smaller parcels because of building roads causes the instability and death of an ecosystem, or FRAGMENTATION. Our forests are not merely trees and landscapes; they are Earth's ecosystems. "Man cannot live without ecosystems". Our living Earth is alive because of ecosystems. Man breathes, drinks fresh water, has food to eat and crops to grow because of Earth's ecosystems. Every aspect of life on Earth is governed by strict natural laws that are structured by Earth's ecosystems. Ecosystems maintain and govern the atmosphere and the climate. Earth's populations of viruses and bacteria, in the food chain with man, are also checked and balanced by ecosystems, or Earth's natural wild places and things, that is, our roadless forests that denote inherently life and stability. Any form of human intrusion inherently kills an ecosystem. Each native animal, bird, planet, and tree that evolved within an ecosystem holds down a job for that entire system. Birds, salamanders, frogs, and lizards are an ecosystem's natural pest control system. The protectors and champions of the ecosystem. Every tree removed or killed to build a road, destroys a member of the work force of the ecosystem and the home and cover and shelter of its native species. All native trees and plants and all native animals are the strands in the virtual web of all life. (Individual, No Address - #A609.50510)

#### **TO REDUCE AGGRESSIVE ANIMAL ENCOUNTERS**

The continued fragmentation of these areas leaves wildlife isolated and leads to the extinction and/or more frequent altercations with the more aggressive inhabitants, black, brown and grizzly bear. (Individual, Mohawk, NY - #A3753.50510)

I have a hard time dealing with people saying that wildlife is becoming more aggressive. It's no wonder why they might. They are being driven from their homes and forced into our backyards. . . places that are fearful to them as they aren't used to it. . . {and worse, into the roadways only to die} all for the sake of mining and constant building to compensate for a growing number of people. Wouldn't you be a little aggressive if someone came in and took away the only home you have? (Individual, Sarasota, FL - #A1339.53100)

**659. Public Concern: The Forest Service should provide a brochure that identifies prime habitat in all states.**

There should be a brochure to identify to preserve prime habitat in all states. (Individual, Raleigh, NC - #A11420.14100)

*Effects of Activities/Disturbance on Wildlife Habitat*

*Positive Effects*

**660. Public Concern: The Forest Service should allow various activities due to their positive effects on wildlife habitat.**

**LIMITED TIMBER REMOVAL**

I am a professional, wildlife biologist now writing a part of a Status Assessment for an endangered species that occurs in National Forests in eastern U.S. For the sake of this species, I would prefer to see some management option allowing very limited clear-cutting in some of the areas which might become roadless. (Individual, Ithaca, NY - #A416.53200)

Instead of logging roadless areas, open up logging in those forests with environmentally sensitive techniques that leave some timber but clean out the old timber growing too dense to provide suitable big game habitat. (Individual, Idaho Falls, ID - #A4337.53300)

**THE USE OF FIRE OR SOME OTHER MEANS TO CLEAR OUT OLD GROWTH**

If the small companies who lease timber rights are also used to clear dead brush from the areas where they are working, this will reduce the fire hazard. This brush clearing should also be required of neighbors and inholders. An area that I am familiar with is the San Bernardino National Forest. I can remember reading newspaper articles about how there weren't very many deer there anymore and, while the Forest Service was trying to blame this on people, the article stated that the manzanita brush that the deer feed on was so old and woody that the deer couldn't eat it. After about three years of growth, this brush becomes so tough that it might as well be ironwood. If this brush isn't cleared off in one way or another, there aren't going to be any deer because they can't survive without feed. Nature takes care of this problem by fire, but you people try to put out fires as soon as possible and that means that there must be another way to clear out the old growth in order for new growth that deer can feed on can appear. (Individual, No Address - #A8252.30500)

**DREDGING**

They did a study about the damage that dredging does to streams and rivers and found that it was beneficial to the fish. A dredge picks up the overburden first and then puts the gravel on top of it, which makes it much easier for the fish to use the gravel to make their nests. And many fresh water fish do build these gravel nests to put their eggs in. (Individual, No Address - #A8252.54100)

**661. Public Concern: The Forest Service should recognize the beneficial impacts of timber removal, grazing, and road building on wildlife habitat.**

Wildlife habitat: good logging and grazing practices can ensure the varied landscape necessary to support abundant wildlife and many species. Roads can help hunters access areas to help maintain healthy populations. Fires destroy large expanses of habitat. (Individual, McCall, ID - #A29305.53100)

**662. Public Concern: The Forest Service should allow even age management.**

**TO MAINTAIN HABITAT DIVERSITY**

I believe that some clear-cutting should be allowed in order to maintain habitat diversity and to support species of disturbance ecosystems. This exception . . . should amount to a small percent of the roadless areas, perhaps 5% per century. (Individual, Ithaca, NY - #A27558.50100)

## Negative Effects

### 663. Public Concern: The Forest Service should prohibit various activities due to their negative effects on wildlife habitat.

#### ALL ACTIVE MANAGEMENT ACTIVITIES

Stop destroying wildlife habitat for putting houses in them. Everything needs a place to live, not only people. And the addition of urban things into forests will pollute America even more than it already is. (Individual, Flushing, NY - #A11503.50000)

Activities such as logging, road building, suction dredge mining, and motorized recreation need to be prohibited from roadless areas to improve protection of salmon and steelhead populations and reduce the risk of extinction. Existing wilderness and adjacent roadless areas provide de facto salmon refuges for geographically distinct populations of steelhead trout, Chinook salmon and cutthroat trout in the Siskiyou National Forest. Populations of Coho salmon may be found associated with smaller, isolated roadless areas 1,000 acres or less. Spring Chinook and summer steelhead are found associated with roadless areas in the Siskiyou, Klamath and Six Rivers National Forest. The Klamath/Siskiyou region has the largest concentration of undamaged rivers outside of Alaska. These undimmed rivers and creek support native, naturally reproducing salmon and steelhead. Roadless areas are seldom stocked with artificially produced salmonids thus promoting genetic integrity. Activities such as road building, commercial logging, salvage logging, heavy handed fire suppression, suction dredging, home building associated with mining, water withdrawals for mining, fish stocking, ski area expansion, and access with motorized vehicle have negative impacts to salmon and steelhead and should be prohibited. Forest managers often allow these activities to occur by claiming the impact is negligible. Cumulative impacts, which eventually become significant over time, are rarely taken seriously. The result is a degraded ecosystem with reduced production of salmon and steelhead. (Organization, Cave Junction, OR - #A17235.54200)

#### ROAD CONSTRUCTION

I am particularly concerned about the proposed Finger Mountain sale in Tenakee Inlet. The area in Goose River where road building is proposed is a high salmon producing spot and waterfowl feeding area. Bears, deer mink and marten also frequent that area. Prohibiting roads would save this important habitat. (Individual, Tenakee Springs, AK - #A5143.53100)

#### THINNING

I am 60 years old and I can remember when the deer were very plentiful in the area of the Ochoco National Forest. I am planning on hunting this area next week and am wondering if I will find more forest thinned when I arrive. I believe thinning of the forest and making them look like a huge park has destroyed more habitat for deer and elk than anything else. The land looks the same but the forest is left without any cover for these animals to hide and bed. It used to be the policy of the National Forest to leave the north slopes with the original cover so the deer and elk would have a place to hide and bed and signs were posted stating this. Last year I found one of these signs posted on a tree and it made me laugh inside. Somewhere along the way the USFS has decided we need the forest cleared of undergrowth and denuded of natural growth. I don't know why this policy was reversed but I think it should be given consideration again. I know the area that I hunt has been thinned three times in the past 7 yrs. and the deer and elk are not as thick as they were. This is an area that has road closures and is being managed by ODFW, USFS, and Rocky Mountain Elk Foundation for better game habitat. I think these groups should look at this thinning issue a little more closely. (Individual, Forest Grove, OR - #A6045.53300)

#### MINING

I live in Florida, where mining of phosphorous and other minerals is taking away a precious "home" for wildlife in the Everglades. I have a hard time dealing with this thought, especially when I know that it's cheaper for us to buy these minerals from outside countries due to their failing economies, than it is for us to mine them right out of our own state. (Individual, Sarasota, FL - #A1339.53100)

**664. Public Concern: The Forest Service should address the negative effects of log transfer facilities on aquatic habitats.**

Road building and subsequent clear cutting have also resulted in hundreds of log transfer facilities through Southeast and South-central Alaska. Bark from logs deposited into Alaska's inland marine waters covers thousands of acres of near-shore habitat. In many bays, fish and invertebrate habitat and important crab fisheries have been adversely affected because of this activity which is a direct result of road building and high volume timber sales. Many log transfer facilities are on the Clean Water Act [section] 303(d) list of impaired water bodies and probably will remain on the list until an active program is implemented to clean up these sites. Bark in large quantities does not seem to decompose or wash away passively. (Individual, Juneau, AK - #A23242.54100)

**665. Public Concern: The Forest Service should address the negative effects of roads on wildlife habitat.**

**ON AMERICAN MARTEN**

Marten (*Martes americana*) are widespread in the Tongass National Forest, and are an important furbearer. Density of roads has been found to affect the quality of habitat for marten where there is potential for overtrapping. A habitat capability model developed for evaluation of marten habitat on the Tongass National Forest predicts declines in marten densities at road densities as low as 0.2 miles per square mile, and population declines of 90 percent where road densities approach 0.6 miles per square mile. (Permit Holder, Juneau, AK - #A23220.50000)

**ON BEAVER**

As a resident of an area surrounded by national forests, it is the roadless areas that I most cherish. The areas with roads have lost their scenic values due to logging. The huckleberry patches have been destroyed, never to return in my lifetime. The elk calving areas are gone. The nests of goshawks and other forest raptors have been lost. In areas where there are roads but no commercial logging, firewood gathering and associated activities have vastly reduced the quality of the forest—one finds skid tracks, non-native vegetation, litter, and the lack of snags and woody debris so essential to many kinds of wildlife. The rich humus from decaying logs is not present, reducing the vitality of plant communities. Hydrological processes, including beaver populations, with their capacity to create and restore wetlands, have been disrupted and degraded by roads and associated development. (Individual, Victor, ID - #A20625.45100)

**666. Public Concern: The Forest Service should close roads after timber removal.**

**TO PROTECT WILDLIFE HABITAT**

I live in the center of the GMUG forests and all are in serious climax situations due to fire suppression. This has led to the decline of our deer herds in Colorado. Additional travel corridors will only make the situation worse. If areas need to be harvested for habitat improvement I support that as long as roads are closed on completion of timber harvest. (Individual, Delta, CO - #A4287.5300)

**667. Public Concern: The Forest Service should address "edge effects" on songbird populations.**

Excessive logging roads have harmed much of the wildlife by making too easy access for humans and allowing decreased songbird survival by the now well understood "edge effect". (Individual, Cheney, WA - #A6154.53000)

There is some indication that unroaded tracts of forests 1000 acres or less can provide enough interior habitat to suit at least some interior birds, which is one of the reasons parcels of this size should receive immediate protection under roadless policy. (Organization, Washington, DC - #A22129.45320)

## Threatened and Endangered Species

### Summary

**General Comments** – A number of comments regarding threatened and endangered species suggest reasons for and methods to protect these species. People request that the Forest Service protect roadless areas as habitat for endangered species, specifically for the spotted owl, bald eagle, and grizzly bear. Some suggest that protecting roadless areas would prevent costly listing of species under the Endangered Species Act (see also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Endangered Species Act*). An organization requests that the Forest Service manage roadless areas in accordance with the Canada Lynx Conservation Agreement. Others ask that the Agency address habitat improvement for threatened and endangered species in forest plans.

Some assert that management of endangered species requires access. The Forest Service, some say, should not designate roadless areas in endangered species habitat because access is needed to accommodate fuel reduction projects and fire fighting. Additionally, a few respondents say that species extinction is a natural occurrence and assert that the Forest Service should not take special steps to protect endangered species.

**Effects of Activities/Disturbance on Threatened and Endangered Species** – Several respondents suggest activities which, they claim, would help protect endangered species. One individual suggests that the Forest Service should permit wildlife rescue operations in roadless areas because roadless designations may prevent such rescues of endangered species. Another individual suggests that the Forest Service relocate endangered fish species during times of drought. While some respondents conclude that certain disturbances are beneficial to endangered species—such as flooding for salmonids—others assert that the Forest Service should consider the negative impacts of various activities/disturbance, such as roads, timber removal, and wildfire, on threatened and endangered species.

### *Threatened and Endangered Species General*

#### **668. Public Concern: The Forest Service should protect roadless areas.**

##### **AS ENDANGERED SPECIES HABITAT**

We do not have the remotest idea what the consequence will be when a species becomes extinct as a result of human actions. Certainly one impact of the demise of the spotted owl is likely to be an increase in the rodent population in that area—which could have very serious consequences. If other species suffer the same fate as a result of this proposed amendment, how will we know what other consequences there might be? (Individual, Bakersfield, CA - #A390.50000)

The main role in my opinion is for endangered animal protection and watershed health. (Individual, Wheaton, IL - #A52.50000)

The obvious and most important benefit is the habitat it would provide for over 1600 rare, threatened, endangered and sensitive species and the benefit to our air, water, and land for future generations of people, families, communities, and wildlife. (Individual, Bellevue, WA - #A637.50000)

We are now on the steeply rising slope of exponential population growth. Humans are pressing out everywhere. Dr. Richard Leakey now says that “between 50,000 and 100,000 species are lost every year.

The current rate of species loss is imperiling the planet” (BBC news 8/24/01). With an ever increasing human population, we must provide an increasing land base of protected areas for natural recreation and research. We must preserve some natural ecosystems while we still can. (Individual, Sitka, AK - #A15506.50400)

South Fork Mountain IRA here in North Idaho, for instance, will already be reduced in size due to Stimson Lumber Company’s ANILCA access easement yet South Fork Mountain and roadless lands to the west on the Colville National Forest comprise extremely important refugia for a host of ESA listed species that are suffering continual assaults on their habitat from motorized recreationists, inholding timber corporations, and fragmentation from numerous activities that inexorably shrink these few remaining islands of viable habitat. It is no accident that their viability as habitat is directly tied to their status as roadless lands.

This example is not unique. If you would look at the grizzly bear management units (CMUs), the lynx analysis units (LAUs) and refugia for bull trout in the south Selkirk Mountains, you would see that all of the best remaining habitat is found in roadless areas. This is surely not coincidence.

While recovery of ESA listed species is not popular with extractive industries, it is the mandate of our public agencies. Unless we wish even more contentious battles in the future over species extinctions, we should take all reasonable steps now to ensure that adequate viable habitat exists and that further listings can be avoided. Roadless areas protection is sound policy and furthermore, it is the will of the American people (to whom these forests belong.) (Individual, Blanchard, ID - #A17249.53200)

We are very concerned that the loss of additional large blocks of forest areas in Washington State could directly contribute to future Endangered Species listings. It would be difficult to estimate the economic costs that could be associated with such potential listings, but in Washington we know from past history that these costs can be tremendous. (Organization, Seattle, WA - #A21904.53200)

#### **AS SPOTTED OWL HABITAT**

It should be noted that after an aggressive timber harvest by the tribe adjacent to the northern boundary of the LNF, a decrease in the Mexican Spotted Owl population in the LNF was observed coincidental with an increase of that species on tribal land. Similar observations have been made concerning the California Spotted Owl. One suspects that the USFWS needs to revise its opinion regarding habitat of the Spotted Owl. (Individual, Ruidoso, NM - #A17775.53200)

#### **AS BALD EAGLE HABITAT**

Please protect the habitat of the Bald Eagle, the symbol of our nation’s freedom and strength. (Individual, North Hollywood, CA - #A19944.53200)

#### **AS GRIZZLY BEAR HABITAT**

As fragmentation and degradation of habitat expands, more populations are forced to assume metapopulation structures. Metapopulations are assemblages of local populations sustained by a balance of extinction and colonization (Hanski 1994; Hanski and Gilpin 1997). Metapopulation viability is maintained through the migration of individuals between patches of habitat. It is essential that large patches of core habitat, such as that provided by roadless areas, be protected. Habitat fragmentation may result in smaller and more isolated wildlife populations, particularly for species such as Grizzly Bears with demanding habitat needs. Smaller populations are more vulnerable to local extinction, due to stochastic events (Gilpin and Soule 1986). Smaller populations are also more susceptible allowing for the replenishing of populations and expansion of the gene pool (Noss 1983, 1987, 1992; Noss and Harris 1986; Craighead and Vyse 1995; Paetkau et al. 1997; Beir 1993). Fragmentation may substantially alter the microclimate of forests edges as well as interiors (i.e. radiation, wind, and water fluxes). (Organization, Missoula, MT - #A613.53110)

I write to you to protect grizzly bears and their babies and their habitat. One of the best ways you can do this is to implement the Forest Service’s historic rule to protect roadless areas in our national forests.

Along with more than one million other Americans who commented on this policy, I strongly support the protection of wild places and wildlife like the grizzly. (Individual, Stillwater, MN - #A5162.53100)

I strongly support the protection of wild places and wildlife like the grizzly. (Individual, Portland, OR - #A1583.53000)

#### **TO PREVENT COSTLY LISTING OF SPECIES UNDER THE ENDANGERED SPECIES ACT**

The Wyoming Range is a spectacular forest with Canadian lynx and Bonneville cutthroat trout—two wildlife species that are very sensitive and imperiled. We need to protect the last remnants of unroaded country in Wyoming to maintain habitat for these unique species. In fact, there are over 110 wildlife species at-risk in Wyoming that need the undeveloped, lower altitude, roadless areas forest for their survival. Listing and ensuring the protection of these species under the Endangered Species Act would cost Wyoming millions of dollars. It would be better we maintain the roadless areas as pristine, providing habitat for wildlife, than allowing the expensive development of wild forests to the detriment of our wildlife. (Individual, Jeffrey City, WY - #A27115.53000)

#### **669. Public Concern: The Forest Service should manage roadless areas in accordance with the Canada Lynx Conservation Agreement.**

We would like to point out that on March 1, 2000 the National Forest Service signed the Canada Lynx Conservation Agreement” agreeing that the assessment and strategy were acceptable and would be followed. Because of the priority to manage corridor as a healthy eco-system and encourage movement of species such as the Canada lynx, I feel that the NF recognize the extreme importance of roadless lands as a potential “safe area” for species. McKelvey et al. (2000d) argued that a system of reserved embedded in a fragmented and non-natural landscape would be sufficient to sustain lynx populations. Rather, a strategy that encompasses the entire landscape may be necessary. Conservation Assessment and Strategy recommends that “refugia” be created to encourage the return of this threatened species. Refugia are large, contiguous areas encompassing the full array of seasonal habitats, in which lynx are present or occurred historically, and where natural ecological processes predominate. Refugia must be relatively secure from human exploitation, habitat degradation, and substantial winter access. Refugia should be sufficiently well connected to permit genetic interchange within and between geographic areas. We believe that many of the roadless areas in conjunction with now existing wilderness areas are the only prime “refugia” possibility available within the north-south wildlife corridor. Most lynx occurrences (83) were associated with Rocky Mountain Conifer Forest, and most (77%) were within the 1,500-2000 m (4,920-6,560 ft) elevation zone (McKelvey et al, 2000b). These statistics enforce the roadless area habitat as being critical. A wide variety of factors have influenced lynx status. These include excessive legal and illegal trapping, extensive timber harvest, habitat modification, thinning, slash treatment, brush control, pesticides, herbicides, livestock grazing, fire suppression, forest maturation, catastrophic fires, recreational use, patchiness of suitable habitat, geographic isolation, prey availability, competition with other carnivores. (Organization, Logan, UT - #A15400.53200)

#### **670. Public Concern: The Forest Service should address habitat improvement for threatened and endangered species in forest plans.**

The current roadless area conservation rule allows for activities that would help create habitat for threatened and endangered species or maintain/restore historical ecosystem composition and structure. Specifically, the rule allows for timber management designed to *(I) improve Threatened, Endangered, Proposed, or Sensitive species habitat, or (II) to maintain or restore the characteristics of ecosystem composition and structure.* We believe it is important to specify in the Forest plan—to the extent possible—in which roadless areas these exemptions would apply. The Forest plan should also outline what activities would be needed to create the habitat for the T and E species or would maintain/restore desired ecosystem composition and structure. This outline should provide sideboards for any projects that might be proposed later. (Civic Group, Roanoke, VA - #A1713.50510)

**671. Public Concern: The Forest Service should not designate roadless areas in endangered species habitat.**

I would recommend that you do not have roadless areas where endangered species exist. Road access could provide for fuel reduction projects and fire fighting access in order to save the habitat. (Individual, Leavenworth, WA - #A6617.53200)

Access is the foundation for all management activities on our public lands. Lack of access to unroaded areas prevented spotted owl census takers from truly measuring populations effectively. Spotted owl populations were inaccurately counted resulting in decisions that were not based on solid science. Take a look at the maps showing spotted owl nest locations. Few locations are very far from existing road systems. Census takers did not have access and spotted owl populations were inaccurately counted. Bad decisions resulted. (Individual, Springfield, OR - #A15730.53200)

**672. Public Concern: The Forest Service should recognize that species extinction is a natural occurrence.**

I know that the fate of greater than 90% of the species which existed upon this earth was extinction. By attempting to protect endangered species, we are interfering with the natural process of evolution, e.g., the Darwinian principle of mutation plus survival of the fittest. (Individual, Jackson, WY - #A29552.53200)

And [land use restrictions] don't mean let some "taxonomist" turn a variant into a separate "species" to protect some land some "environmentalist" wants to keep everyone off. Use some common sense and recognize that some animals go to the edge of their range, and then die. Allowing a state or government to declare an endangered species because an animal is beyond their normal range is BS. Genetic diversity is not the be-all and end-all of reasons for existence. Natural selection means some animals will die out. It's nature's way. And environments change without man, resulting in extinction. So let's use some common sense here. (Individual, Centerville, OH - #A27001.50200)

*Effects of Activities/Disturbance on Threatened and Endangered Species*

**673. Public Concern: The Forest Service should permit wildlife rescue operations in roadless areas.**

**TO PROTECT THREATENED AND ENDANGERED SPECIES**

Roadless designations diminish/prevent wildlife rescue operations of the very species mandated for protection. Including us. (Individual, Santa Ysabel, CA - #A26392.91110)

**674. Public Concern: The Forest Service should prohibit hunting of threatened or endangered species.**

The following activities should be completely prohibited in roadless areas: . . . hunting of threatened or endangered species . . . (Individual, Port Angeles, WA - #A6179.90110)

**675. Public Concern: The Forest Service should relocate endangered fish species during times of drought.**

The lack of water in Klamath Basin is killing deer, birds, etc. Cannot the shortnose suckerfish be relocated in ponds where the water is abundant, such as my area, Jefferson, Oregon? I know of many large ponds. If the lake had no water, you would relocate the shortnose suckerfish until the lake once again has enough water to sustain the environment. The Cohn salmon could be relocated until the river is at its normal depth next year or the year after; rather than exchange the death of 100,000 other species by denying them water in order to keep the river full of water in order to save particular species. (Individual, Jefferson, OR - #A777.54100)

## Positive Effects

### **676. Public Concern: The Forest Service should recognize the importance of flooding to salmonids.**

The environmental and ecological values of these areas are already well known. To the extent unfragmented forest habitat still exists in the United States, it exists in the Inventoried and Non-Inventoried Roadless Areas under Forest Service management, within designated Wilderness areas, and in some National Parks. This small remnant of our once vast natural forests is all that remains. The unfragmented forest landscapes provide the best hope for the retention and restoration of wide-ranging carnivores (like grizzly bear, wolf, lynx, wolverine, fisher, and pine marten) within the United States. These areas also provide the last and best opportunity to study natural processes (windthrow, flooding, wildfire, and insect outbreaks) operating within large landscapes. While these natural processes may be locally destructive, they serve the intricate web of species dependent upon them. To cite but one example, flooding—while potentially destructive in the short term—is absolutely essential to the long-term survival of salmonids in Pacific coast streams. Floods remove silt, transport various sized rocks necessary for replenishment of spawning gravel, and create off-channel sloughs where juvenile salmon can feed and escape predators. The Forest Service has a critical role to play in preserving this and other system-wide natural processes—and the species dependent on these processes. As a necessary first step, the protection of roadless areas significantly advances this goal. (Individual, Seattle, WA - #A11805.50000)

## Negative Effects

### **677. Public Concern: The Forest Service should consider the negative impacts of various activities/disturbance on threatened and endangered species.**

#### **ROADS**

Roads encourage poaching, and incidental road kills of protected or endangered species. (Individual, Seattle, WA - #A8810.90130)

#### **TIMBER REMOVAL**

Significant threats abound to this nation's threatened and endangered wildlife, and recovery prospects too often depend on existing roadless areas for their very significant habitat values. Here in North Idaho and Eastern Washington, for instance, timber companies are already encroaching into some of the last redoubts for several ESA listed Threatened and Endangered species. Often, the only viable habitat remaining is found in roadless areas that are typically surrounded by miles of roads and clearcuts. Past Forest Service and timber corporation logging and road building has led to these highly fragmented landscapes. As a result of rampant corporate logging and the Forest Service's legacy of "multiple use", Agency Biological Assessments increasingly are finding that further activities will be likely to "adversely affect" numerous Threatened and Endangered species like grizzly bear, mountain caribou, Canada lynx, gray wolves and bull trout. (Individual, Blanchard, ID - #A17249.50000)

Logging may cause soil erosion that may lead to landslides and siltation of salmon-spawning streams. For specifics, guess where the best salmon-spawning habitat in Eastern Oregon is located. In my backyard—the North Fork John Day River, flowing through a wilderness and several nearby roadless areas. For the most part, our National Forest roadless areas are the healthiest forests we have. (Individual, Bates, OR - #A15564.54200)

#### **WILDFIRE**

It is hard for me to believe that all rare species occur only on private property. If we do not protect these from fire in our forests, how do we require private property owners to take extraordinary measures to protect them? (Individual, Loveland, CO - #A7090.30400)

## Vegetation and Botanical Resources

### Summary

**General Comments** – Those who address the topic of vegetation and botanical resources request that the Forest Service provide protection to these resources, especially by protecting roadless areas and old-growth forests. Respondents suggest that protecting roadless areas would serve to prevent the spread of invasive species, protect endemic plants, and allow old growth to return. People ask for the protection of old-growth forests for ecological values, to compensate for global losses of old growth, to help lessen global warming, to preserve biodiversity, and to protect against natural disasters. Some respondents assert that old-growth forest protection is warranted because old growth is not replaceable and because that is what most citizens want. Others state that the Forest Service should protect forests to prevent single-species monocultures.

**Species-Specific Considerations** – A few respondents comment about specific botanical species. One individual requests that the Forest Service protect black spruce while another wants the Agency to maintain or increase the amount of aspen forest. Others request that the Forest Service protect lower elevation hardwood forests, plant more oak trees, and discontinue the practice of replacing hardwoods with pine.

**Effects of Activities/Disturbances on Species** – One individual suggests that the Forest Service should manage vegetation with longer harvest rotations. A few respondents suggest that certain activities are beneficial to vegetation resources. Some believe that selective timber removal encourages the growth of young trees while others conclude that thinning second growth trees promotes old-growth characteristics. One individual proposes even-age management as a method for regenerating even-aged forests.

A number of respondents state that roads have negative effects on vegetation. Some comment that roads allow the introduction of invasive species, while others discuss the effect of roads on rare plant species. One individual suggests that the Forest Service should consider the role of animals in spreading noxious weeds. (See also Chapter 6: Protecting Forests (Question 3): Roads/Access, Timber Harvest, and Insects, Disease, and Noxious Plants.) Others believe that tree farms and livestock grazing have negative effects on vegetation resources.

### *Vegetation and Botanical Resources General*

#### **678. Public Concern: The Forest Service should identify the vegetative cover affected by the Roadless Area Conservation Rule.**

I appreciated the July 10 Federal Register notice's having given the summary facts, but still don't know certain key facts involved. We know that the January 12 rule effectively "saved" from logging and roadbuilding only the 9 million acres of timberland classified as CAS timberlands in existing forest plans. Are all 9 million acres pristine old-growth forest? (Since many of them are in Idaho and I just finished reading Stephen Pyne's new book about the 1910 Great Fires, I gotta ask.) Are the other 47.5 million acres of inventoried roadless lands ancient forests? I doubt it. If this initiative is not about "saving" 58.5 million acres of pristine old-growth forests from logging and roads, how much pristine old-growth is it about? What's the rest of the vegetative cover? (Individual, Quincy, CA - #A30023.14140)

**679. Public Concern: The Forest Service should protect roadless areas.****TO PREVENT THE SPREAD OF INVASIVE SPECIES**

Roads and disturbances from logging, and grazing have also increasingly become vectors and corridors for the introduction of invasive non-native plants. We ask that you consider the effects of roadbuilding on the prevalence and spread of invasive species, as well as on the viability of native plant populations. Roadless areas are essential to maintaining the genetic and ecological integrity of our last remaining wild forests. (Association, Kelsey, CA - #A15815.14500)

**TO PREVENT HABITAT LOSS**

As the long-time Forestry Coordinator for the California Nature Plant Society, I am painfully aware of the habitat loss that has taken place on USFS lands, and that is why I feel so strongly about protecting the remaining roadless areas. (Individual, Carmel Valley, CA - #A4741.60400)

**TO PROTECT ENDEMIC PLANTS**

CNPS still fully supports this measure, as we did in 1999 and 2000. The remaining roadless acres in our public forests are the last reservoirs where native plants and wildlife can exist without continuous pressure from intrusions that threaten to erode habitat and threaten their continued viability. Roadless areas in our region are precious public treasures because of their resource values diversity, relatively pristine condition, and aesthetic, scientific, and other resource values that make them irreplaceable, and their protection a necessity. The Klamath-Siskiyou ecoregion, for example, contains the greatest diversity of conifer species of any of the world's temperate forests (30 species of conifers). More than 1,800 different species of plants have been documented for this region, of which 131 are endemic and do not occur anywhere else on Earth. Yet, only 10 percent or less of the area is legally protected from logging. (Association, Kelsey, CA - #A15815.45000)

**TO ALLOW OLD GROWTH TO RETURN**

A roadless area helps what is now not an old growth area have a chance to become one. A lot of effort is put into saving old growth and wilderness areas which I feel is a good thing but there are places which can develop naturally back into that state if they are not seen as "up for whoever wants to grab it". (Individual, Crystal, MN - #A23605.60120)

**FOR NATIVE FORBS, LICHENS, AND FUNGI**

DellaSala and Strittholt (1999) have documented the importance of smaller roadless areas, which share many attributes in common with inventoried roadless areas, including:

Source areas for recolonization of native forbs, lichens, and mycorrhizal fungi. (Organization, Ashland, OR - #A20421.45100)

**680. Public Concern: The Forest Service should protect old-growth forests.**

Rather than defend this popular act in court against Boise-Cascade, my government rolled over and greased up. Now it's time for USDA, the stewards of my forest, to defend this dwindling legacy. Even without the Act, you can protect the old growth forests. Please do. (Individual, Bothell, WA - #A639.30100)

I feel our forests are much like Central Park in New York City. When Olmstead designed the park, there was only open land all around. But today such a different sight to behold. And I hope you and the rest of our government could have the same foresight and plan ahead to the time when our forests could possibly be the only natural green space we have left. It'd sure be nice if that green space had mature trees set in their natural state. I'm sure you've been to the Redwood's in California, what a wonderful sense it is walking around them. It would be so nice to let other trees mature around the U.S. in large quantities. (Though of course I know the other trees wouldn't be quite the scale!) (Individual, Brevard, NC - #A151.50000)

### **FOR THEIR ECOLOGICAL VALUES**

To maintain fish and wildlife habitat and forest diversity on the Tongass, the remaining high-volume stands of old growth should be conserved for their ecosystem values. To date, the timber industry has harvested over 70 percent of the most valuable timber stands in Southeast Alaska, which includes both national forest lands and Native corporation lands that were selected from within the Tongass for their high economic value. Protecting the remaining roadless areas on the Tongass will help achieve balanced forest management. In addition, steep rugged terrain makes roads in this region very expensive to construct and vulnerable to erosion and landslides. The ecological risks associated with developing these areas are extremely high and may jeopardize commercial and sport fishing, hunting, tourism, recreation, and subsistence opportunities in Southeast Alaska. These multiple resource values of the Tongass are basic to maintaining and increasing economic diversity, as well as for maintaining the quality of life for people who live in Southeast Alaska. Furthermore, the high costs of road construction and the deficit timber sales on the Tongass do not justify entering the remaining roadless areas. (Organization, Anchorage, AK - #A22992.50100)

### **TO COMPENSATE FOR GLOBAL LOSSES OF OLD GROWTH**

It seems very plausible and acceptable to allocate on a national scale, a larger percentage of federal land as older mature forests to compensate for the mature forest type that has been lost nationwide on private and public lands. It would seem likely that higher percentages than the historic range of variability suggest is needed if mature forest on a local scale should be preserved in order to compensate for the overall huge losses on a national scales. Since private land is susceptible to changing ownership and therefore management, that land base cannot be counted on to provide forest types that may take several hundred years to produce. Therefore, the majority of this older age forest must be maintained in federal reserves. (Individual, Penrose, CO - #A21448.50410)

### **TO HELP LESSEN GLOBAL WARMING**

An important feature of mature or old growth forests that is overlooked in the typical agency analysis is the contribution of these older forest types to carbon sequestration. The accumulation of carbon into the cellulose of trees, downed timber, and forest floor humus is a cumulative event. This type of accumulation increases only over time and older forests hold much larger amounts of carbon than younger forests can. Young forests may hold increasing amounts due to high growth rates but they lack the large amounts of carbon found in dead and downed timber or in the soil horizons that are found in older forests. The large amounts of carbon that are held in older forests serve to keep this carbon from being released into the atmosphere and contributing to global warming. Those forests in designated roadless areas will continue to serve as carbon sinks on a national and global level.

On a national level, the vast majority of mature forest types that contribute most significantly to carbon sequestration especially in the east and Midwest are gone. Since the vast majority of land in the U.S. is private land, and much of that was former old growth woodland that is now converted to mature carbon sink forests. The percentages of forests found nationwide in old growth structural stages is minute compared to that of pre-Columbian times. On a national level, we now are no doubt extremely below the minimum Historic Range of Variability in the older forest structural stages. The Global and hemispheric climate and ecosystems equilibrium developed and was adapted to those conditions where a great deal more carbon remained trapped in mature forests and their resulting soil horizons. The release of this carbon from forests on a national and global level in the last century is considered a major contributor to global warming. . . . Roadless areas designation is a major step in the right direction in our nation doing its part to lessen global warming. (Individual, Penrose, CO - #A21448.50410)

### **TO PRESERVE PLANT AND ANIMAL SPECIES AND GENETIC DIVERSITY**

The last 150 years has seen the relentless destruction of forests and ecosystems at an unprecedented rate. The devastation that resulted from the clear cutting of old growth redwood and Douglas fir forests in the northwest should be a clear lesson to us all. The streams have become polluted to the point that they are no longer support wild fish and populations. Even the climate has changed as a result of the loss of cover of trees that held moisture, and cooled the surrounding area. Animal species that flourish within the protection and shade that the forest provided have disappeared. Bird species that used to move through the upper story of the forest have become isolated because they will not move into the barren stump fields that remain. Plant species that require shade and decomposing parts of the trees are gone as well.

The genetic diversity of seedlings in a fragmented forest may be relatively small indeed. (Individual, Corpus Christi, TX - #A15488.10111)

#### TO PROTECT AGAINST NATURAL DISASTERS

One weakening element to the health of an ecosystem causes susceptibility to others, setting off chain reactions of unforeseen and potentially devastating consequences. This country's trees are in a state of decline. Older growth trees are the strongest—those forests best able to withstand disasters—natural, such as fires, tornados, or hurricanes, and other threats; they also provide a canopy that is an integral part of an ecosystem, that would take centuries to replicate (assuming optimal growing conditions, which is not, unfortunately, the case). (Individual, Piermont, NY - #A28736.60120)

#### BECAUSE THEY ARE NOT REPLACEABLE

The 2001 Montana legislature declared the sole value of the State's old growth forests is as lumber, and that preservation for any other use (ecological diversity, wildlife, etc.) can only be done by paying the stand's lumber value to the State. This opened up logging of fifteen old growth stands just this summer. One federal environmental value should be the preservation of old growth forests, since neither Montana nor the forest industry has any intent of doing so. Fortunately many of the proposed roadless areas are old growth, preserved for over a century of extensive logging and mining. Old growth is not replaceable. (Individual, Lolo, MT - #A111.60120)

We have very little left in the way of old growth forest, especially old growth that has not been compromised in one way or another. What is left should be protected. It cannot be replaced for centuries and, once cut, is not likely to be spared in the future. Please, we have little of our forest heritage left. What is left is precious. Please work for the forest, not deforestation. (Individual, Cherry Hill, NJ - #A1789.60120)

Competing Values-Limited Resources: It should be remembered that a true old growth forest is NOT a renewable resource! Man can destroy pristine old growth forests, but we can not restore one. A second growth into an area of second or third growth is struck by the magnitude of the changes caused by logging—even logging done more than 100 years ago. **TRUE, PRISTINE OLD GROWTH FORESTS MUST BE PROTECTED FOR FUTURE GENERATIONS.** I would hate to think of a time when the only exposure to the glory of a true old growth forest was with virtual reality on a computer. (Individual, Reno, NV - #A5110.60120)

#### BECAUSE THAT IS WHAT THE MAJORITY OF CITIZENS WANT

The reason that the recent Presidential election was so close is that we, the voters, didn't want either Bush or Gore. We, the voters, have repeatedly indicated in polls that we want the environment protected. When there is a candidate who is truly concerned about the environment, that candidate usually wins. Unfortunately, the Republican and Democratic parties are both controlled by the people who give money for election campaigns, and they—a minority—are the ones who don't care about the environment. Please do what we, the voters, want, which is to protect the remaining old growth forests and all our National Forests from unneeded exploitation (that only benefits a greedy and already wealthy few). (Individual, Portland, OR - #A14737.15000)

### 681. Public Concern: The Forest Service should recognize that old growth cannot be preserved.

From a biological point of view, absolutely no living organism can be preserved. This includes an old-growth forest.

*Therefore, how can this country justify setting aside any more lands from timber production?* (Individual, No Address - #A25635.60120)

**682. Public Concern: The Forest Service should recognize the value of forest fungi.**

The fungi that live in symbiosis with the forest trees have evolved over millions of years and provide enjoyment and gourmet delights to many of us mushroom hunters. These forest fungi also provide essential nutrition for those mighty trees and underground food webs for hundreds of plants and insects important to the integrity of the forest ecosystem. (Individual, Elizabethtown, IN - #A19017.60300)

**683. Public Concern: The Forest Service should recognize that deforestation leads to desertification.**

Worldwide man has a habit of depleting forests, which gradually leads to desertification. The Mediterranean had chiefly evergreens, oaks, and pines, and Attica was entirely deforested in the 5th century B.C. In Europe, deforestation did not begin until the Middle Ages and by 1862 most of the beautiful forests had vanished. (From Before Nature Dies by Jean Dorst) 75% of forests worldwide have been cleared. 15% of original U.S. forests remain. (www.bhs.berkeley.K12.CA.US/departments/science/APwgs/Killas/deser.htm) 67% of total area of U.S. forest are commercial (www.forestinformat.com) let that be enough! (Individual, Seattle, WA - #A20824.50420)

**684. Public Concern: The Forest Service should protect forests to prevent single-species monocultures.**

**BECAUSE THEY PROVIDE LITTLE HABITAT FOR BIRD AND PLANT SPECIES AND DO NOT DRAW TOURISTS**

Much of the current National Forest is managed to promote the growth of particular tree species. There is nothing natural about a red pine stand, planted row by row. My own research indicates mono-cultural stands provide little habitat for bird and plant species, nor do they draw crowds of tourists to bolster the local economy. The over abundant white-tail deer have also impacted the woody cover and herbaceous layer of the forest. The impact of too many deer is evident in the inability of eastern hemlock and northern red oak to recover to pre-timbering year percentages. (Individual, Eagle River, WI - #A844.60100)

**BECAUSE THEY ARE NOT CONDUCIVE TO SPECIES DIVERSITY**

This protection is especially significant in my area as most privately owned forest here are rapidly being converted to single species pine forest which, as you know, are not conducive to species diversity, in wildlife and obviously in tree and understory species. (Individual, Troy, NC - #A1625.60100)

**BECAUSE THERE IS ALREADY ENOUGH LAND DEVOTED TO SINGLE SPECIES**

As a life-long inhabitant of the Oregon forest land, I know that there is already enough land devoted to single-species tree farms. That small portion of land with a variety of interdependent species which actually constitutes viable and true forest must be preserved as the soul of our land. There is more to life than the dollar. (Individual, No Address - #A3925.60100)

**685. Public Concern: The Forest Service should promote regeneration in previously harvested areas.**

**TO REPLACE VALUABLE TIMBER**

On the Forests where I worked, areas where commercial timber production was considered the most important resource were not managed properly for timber production. Regeneration was not adequate in many areas, or seedlings came in too thickly and stunted at small diameters, creating areas of little value for timber, wildlife or recreation. (Individual, Bozeman, MT - #A5649.65200)

**686. Public Concern: The Forest Service should protect national grasslands.****BECAUSE THEY ARE ENDANGERED AND FRAGMENTED**

I'm particularly concerned about our National Grasslands, vulnerable as they are to off roaders. There are many National Forest wildernesses, both designated and de facto, but grasslands are an endangered and fragmented stepchild. (Individual, Flagstaff, AZ - #A5026.60400)

**687. Public Concern: The Forest Service should recognize that forest cover is increasing.**

I have read that some people believe that our forests and wildlife are on the verge of extinction. Nothing can be farther from the truth. In fact, the forest cover of this country is increasing and has gradually done so during much of the 20th century. (Association, South Hill, VA - #A17035.50000)

**688. Public Concern: The Forest Service should allow local decisionmakers to develop unique approaches to managing successional disturbance.**

The Society of American Foresters, in their publication, *Forest Types of the United States and Canada*, lists 145 different forest types present in the United States. Each of these forest types is defined by a distinct set of species. Different species respond differently to natural- or human-caused disturbances. Early successional species require disturbance to perpetuate. Late successional species are often replaced by early successional species following disturbance. These different responses to disturbance require unique approaches to management, and forest managers need the flexibility to make decisions from a local perspective. (Governor, State of South Dakota - #A23354.13110)

***Vegetation and Botanical Resources – Species Specific Considerations*****689. Public Concern: The Forest Service should protect black spruce.**

Minnesota is suffering a severe lack of reproduction in its black spruce stands. Black spruce usually thrives in lowland swampy areas, like the area around Baldpate Lake. Unfortunately, black spruce is coveted by the timber industry even though the LRMP does not make allowances for such logging.

Black spruce provides valuable habitat for boreal owls, Canada lynx, and other sensitive species. Most of the acreage identified in RARE II is adjacent to the BWCAW and provides a good buffer area for the wildlife that lives in this wilderness area. (Individual, Lake Tomahawk, WI - #A29653.60100)

**690. Public Concern: The Forest Service should increase the amount of aspen forest.**

In the Chequamegon-Nicolet forest where I live I would like to see efforts to maintain if not increase the amount of aspen forest. I realize this means clear cutting but in 1 to 2 years after a cut the regrowth is impressive. (Individual, Phillips, WI - #A801.60100)

**691. Public Concern: The Forest Service should protect lower elevation hardwood forests.**

Large tracts of undisturbed wild forest have great ecological, recreation and spiritual benefits that far outweigh any temporary economic benefits that might accrue from logging these areas. There are too few of these lands left in the Northeast today, and we should preserve those that are left for future generations. In particular, lower elevation hardwood forests are underrepresented in currently protected wild lands on the WMNF. [White Mountain] (Some of the WMNF Wilderness boundaries seem to have been drawn to exclude the valley hardwoods.) (Individual, Lincoln, NH - #A5640.45000)

**692. Public Concern: The Forest Service should plant more oak trees.**

Also need to plant more oak trees. (Individual, Lumberton, MS - #A11159.60000)

**693. Public Concern: The Forest Service should discontinue the practice of replacing hardwoods with pine.**

Money is lost every year by selling NF timber and replacing hardwoods with pine only benefits the lumber producers. Pines have no nutritional value and leach the nutrients from the soil leaving it unproductive for the future. (Individual, Houston, AR - #A4162.65230)

*Effects of Activities/Disturbance on Vegetation and Botanical Resources*

**694. Public Concern: The Forest Service should manage vegetation with longer harvest rotations.**

If we were to manage the forest rather than a tree farm then 250 to 500 year rotations (in Douglas fir) would be the norm rather than 40 to 100 years. It seems to me that long rotations would serve most creatures' needs, including ours. (Individual, No Address - #A14054.60120)

*Positive Effects*

**695. Public Concern: The Forest Service should allow selective timber removal.**

**TO ENCOURAGE GROWTH OF YOUNG TREES**

I believe "Health" in a forest is best achieved and maintained by selective logging of areas and replanting. Young healthy trees take upon more carbon dioxide and release more oxygen into the atmosphere than "Old Growth". This has a "global" effect and benefits all mankind, and also a product is harvested which has many uses and therefore employs many people. (Individual, Olympia, WA - #A20848.60100)

**696. Public Concern: The Forest Service should thin second growth forests.**

**TO PROMOTE OLD GROWTH CHARACTERISTICS**

There are millions of acres of second-growth forests within late successional and riparian reserves that, according to scientists at the PNW Research Station, will not develop the old-growth characteristics needed in these areas without being thinned. (Individual, White Swan, WA - #A25726.60100)

**697. Public Concern: The Forest Service should allow even-aged management.**

**AS A METHOD FOR REGENERATING EVEN-AGED FORESTS**

The Wilderness Society with paid executives has skillfully used "clear cutting" as a "cause," much the same as Hitler used the "Jewish" problem to support his efforts at world domination. Yet, clear cutting is very simply one method for regenerating even aged forests. However, the Wilderness Society has convinced a large portion of the public in metropolitan areas that "NO" trees should be cut. This has led to vast accumulations of woody fuels and thus the increase of very severe fire seasons (i.e., 2000 and 2001) (Note—at the time of this writing, a 25,000+ acre uncontrolled fire is burning on the Gallatin National Forest mostly in a designated wilderness study area south of Livingston, Montana.)

The congressional establishment of wilderness study areas in western forests has placed the U.S. Forest Service in a no-win situation for almost 25 years, and has severely eroded their ability and credibility in the management of the forests. This administration needs to end the wilderness study concept and move forward. (Individual, Bozeman, MT - #A13871.90510)

## Negative Effects

### **698. Public Concern: The Forest Service should address the negative effects of roads on vegetation.**

#### **INTRODUCTION OF INVASIVE SPECIES**

Roads can enable invasive plants and animals, many of which are nonnative, to expand their ranges. Exotic species often thrive in the environments created by roads and can also be inadvertently transported by vehicles. Roads create open edges to forests that can make species more vulnerable to pest epidemics, invasion of nonnative species, and nest parasites. Examples include: weeds, such as spotted knapweed; aggressive brood parasites, such as the brown headed cowbird, and pathogens, such as cedar root rot. (Professional Society, No Address - #A26799.50000)

#### **EFFECTS ON RARE PLANT SPECIES**

This roadless policy is very important. The Nature Conservancy, a mainstream conservation group, has documented that one third of the plant and animal species in the United States area at risk of extinction. Scientists have shown that many species need large areas free from development impact to maintain viable populations. Easy access through roads or off road vehicles can be a disaster for plants and animals with commercial value. International markets for all sorts of rare wild plants and animals are putting more and more of them at risk. A recent conviction of a man for illegally harvesting at least 107 tons of beargrass from the Willamette National Forest highlights the problem. So do internet ads for the rare Cascade Range Lady Slipper Orchid which cannot be cultivated and cannot be legally harvested. The last thing this rare plant needs is more roads so more people can easily harvest it. (Individual, Deadwood, OR - #A882.50500)

### **699. Public Concern: The Forest Service should recognize the negative effects of tree farms on adjacent areas.**

In our Pacific Northwest, less than 7% of our old-growth forests are left. But some of the Forest Service lands contain older second-growth that has naturally re-generated and could maintain the forest canopies to restore wildlife. But this land is surrounded mostly by tree farms that cut and spray extensively. Each tiny piece of land is precious.

Our little group is a loose-knit, local watchdog group working on various issues. We have united for many reasons, but our main, ultimate goal is one thing: to bring the wildlife that has been wiped out with all the logging activity. The apples lay uneaten for months at a time in this valley. It is dead and sterile. They've wiped out habitat sprayed poisons on everything, then the hunters and trappers take whatever is left. Our valley is lifeless! (Organization, South Prairie, WA - #A28978.50500)

### **700. Public Concern: The Forest Service should recognize the role of animals in spreading noxious weeds.**

An issue raised by those against vehicles in the forest is the spread of weeds. I have pulled noxious weeds on my property and on adjoining forest lands for many years, and I can tell you that animals, both wild and domestic, are high on the list of both weed spread and erosion of the road banks. Many of the knapweeds I have pulled originate from the middle of a cow pie in an area where motorized vehicles cannot access. Hikers and horses are not immune from spreading weeds either. (Individual, East Helena, MT - #A20422.15168)

### **701. Public Concern: The Forest Service should address the effects of livestock grazing on vegetation.**

The sheep under shepherds guide were not controlled from devastating certain land. Certain wonderful wildflower areas were being damaged. (Individual, Reston, VA - #A11846.60100)

## Social Environment and Values

This section includes two subsections: Social Values of Roadless Areas and Adequacy of Analysis.

### Social Values of Roadless Areas

#### Summary

**Social Values General** – a number of respondents comment on the social values they associate with roadless areas. Some urge the Forest Service to adopt the Roadless Area Conservation Rule as written in order to best protect these areas' social values.

Respondents describe a wide range of social values that they believe would best be maintained through implementation of a national rule. One of the most commonly mentioned of these values is the contribution of roadless areas to overall quality of life for local residents and visitors alike. People also state that they value these areas as places to escape from modern pressures, such as a fast pace society, and motorized vehicles; as places to experience natural grandeur; and as places to experience the solitude and natural quiet to be found in them. Others emphasize the multitude of irreplaceable non-monetary values and healthy ecosystems which, they say, roadless areas provide. Some state that human survival and modern society depends on these values, yet they are taken for granted. (See also Chapter 4: Economic Environment and Values: Evaluation of Roadless Areas: *Comparative Costs and Benefits of Ecosystem Protection and Resource Extraction.*)

People also comment on the spiritual values they associate with roadless areas, from the perspective of both traditional institutional religious tenets and more general non-denominational beliefs of spiritual connection and renewal. These respondents state that their religious faith demands careful stewardship and protection of the natural environment, and they say the Rule best embodies this imperative.

The effects of population growth, immigration, and urban sprawl are also topics of comment among many respondents who discuss social issues. Respondents assert that the Rule provides an important counterbalance to continued urbanization and development of private lands. According to some, roadless areas provide an important backcountry recreation outlet for growing metropolitan areas and can take the pressure off of overused wilderness areas. Others state that urban sprawl which encroaches on public lands impedes effective forest management through natural disturbance processes, and ask the Forest Service to help combat this problem.

Although some believe the Rule will protect important social values, other respondents disagree with respect to certain values. These respondents suggest that important social values will be lost due to implementation of the Rule. On a related note, while some respondents assert that roadless areas have their own intrinsic values and right to exist distinct from the human values placed upon them, others believe that roadless areas have no intrinsic value apart from human use and enjoyment.

Some state that intact roadless areas are a vital component of the true American or western experience and provide critical freedom values to an increasingly rule-bound society. In contrast,

others assert that the Rule violates true western values by imposing too many restrictions of its own and restricting the traditional motorized use of these areas.

People also discuss the value they find in personal challenge due to the remoteness of many roadless areas. They claim that the more difficult the journey, the higher the personal sense of accomplishment, and state that this is lacking in a world filled with modern conveniences and immediate gratification. Other respondents disagree and state that the time pressures of modern society necessitate easy vehicular access, or that modern technology makes a true wilderness experience impossible.

While some respondents describe the non-motorized recreational activities in roadless areas as fostering their own family togetherness and which, they assert, will be protected by a national rule, others who enjoy motorized sports state that their family activities are threatened by the Rule. In both cases, respondents agree that these roadless areas are important, but they disagree about which activities are compatible with roadless area values.

**Bequest Values** – Many respondents who discuss social values cite bequest values to future generations of Americans. They believe that the Roadless Area Conservation Rule will best preserve these bequest values, leaving a legacy of environmental protection and roadless area values to their own children and grandchildren as well as to society in general. Some respondents, however, state that traditional multiple use management and resource development provide the proper legacy to future generations, and that a national rule not only threatens roadless areas with disease and catastrophic fire, but prevents future generations who prefer motor sports from access to these areas. A few writers say that bequest values are overblown, and state that a national roadless rule should either be implemented or abandoned to benefit the current generation.

**Educational Values** – Some respondents state that they associate educational values with roadless areas. For some, these areas serve as classrooms for their courses, such as college-level biology or wilderness challenge and backcountry skills programs. Others ask that the Forest Service help educate youth about the values of intact ecosystems in order to increase support for their preservation.

**Access for Special Populations** – Access for special populations is frequently mentioned by those who address social values. Respondents conclude that a national rule will unfairly restrict access to public lands by the elderly and disabled because motorized opportunities will be lost. A number of people describe their own disabilities or age, and assert that their needs are being ignored.

Other respondents believe the Forest Service should dispute the claim that the Roadless Area Conservation Rule will adversely impact these populations. Some state that roaded areas of national forests and other public lands provide ample roaded access to the natural world for the elderly and disabled. Other older Americans state that they still prefer to hike in roadless areas, and that even when they are no longer able to do so, they will benefit from the protection of these areas under a national rule. Others say that special populations can enjoy roadless areas by non-motorized means like other more able-bodied citizens, and will benefit from a national rule. Finally, some respondents suggest that a set of exceptions and accommodations for the elderly or disabled could be incorporated into a national rule.

**Health and Wellness Values** – Some respondents suggest that unmanaged roadless areas make important contributions to health, both physical and mental. Many assert that these areas provide rejuvenation and stress reduction, while others say they provide wilderness therapy opportunities for troubled youth. Some suggest that a national roadless rule will help to encourage walking and help combat the national obesity epidemic. One woman states that she feels safest in roadless areas, far from roads and the easy access they provide to potentially dangerous characters. Others note safety hazards posed by roads cut on steep slopes from landslides, and urge the adoption of a national rule for human safety considerations. Some respondents, however, suggest that a national roadless rule will hamper search and rescue efforts, threatening public health and safety.

**Noise** – A few respondents discuss noise levels in roadless areas, and ask the Forest Service to establish baseline natural sound levels and to set decibel standards, especially for exhaust systems of motorized vehicles and for aircraft. They suggest that high noise levels cause stress to humans and wildlife and are not appropriate for roadless areas. Others state that loud vehicles contribute to conflicts between user groups, so quieter machines could help minimize this problem. Several other respondents assert that the Forest Service should not arbitrarily require roadless areas to have semi-primitive core areas in order to qualify as inventoried because a complete absence of sights and sounds from surrounding areas is not possible, particularly in the eastern United States. They suggest that this requirement will disqualify otherwise deserving roadless areas from protection under a national rule.

### *Social Values of Roadless Areas General*

#### **702. Public Concern: The Forest Service should protect roadless areas with a national roadless rule.**

The roadless areas in our national forests have values beyond the board feet that can be hauled from them. These are places of immense biological importance for maintaining genetic diversity, these are areas that allow for recreation that cannot be found in more developed areas. We must preserve areas that are difficult to reach. These are the areas that lift our spirits, test our bodies, renew our sanity and allow for encounters with creatures that do not live in our crowded neighborhoods. (Individual, Bound Brook, NJ - #A1601.70000)

We in Boulder County continue to support the Roadless Area Conservation Rule (the Rule) and urge its implementation. Our constituents value unspoiled wilderness and recognize that wild lands have a special significance for our own quality of life. They also take a strong interest in preserving this land for the enjoyment of future generations. The Rule is consistent with these priorities, and the public's extensive participation in shaping this rule should be honored. (Elected Official, Boulder County, CO - #A18117.70300)

In Montana we love to hunt wild game. I can tell you from experience where the elk, bighorn, deer, grouse, and all other variety of wildlife like to hang out. . . . Roadless Lands of the National Forests. Cowboy Heaven, the Snowcrest, Wolverine Basin in the Gravellys, Hellroaring in the Centennial Mountains. These places are priceless and they would provide very little long-term economic gains by being developed in any way shape or form. They are serving the greatest good for the greatest number just as they are; by being in their wild state as a part of our health, good fortune, and heritage. It is not often that society will look back in 50 years and comment on how beautifully that road, or that oil and gas well looks upon the landscape, but they will understand what is special about their public lands when they see them unimpaired because we took the right action back in the year 2001. I ask you Chief Bosworth to use your empirical judgment, your heart, and your vision for the future when you recommend to President Bush what should be done regarding America's prized public treasures. As time

goes by our undeveloped lands where clean air, water, solitude, and wild integrity exist will only become more treasured. Let's do what the majority of Americans want, let's keep logging, mining, oil and gas development, and commercialization out of our roadless lands. (Individual, Harrison, MT - #A6949.70000)

The past greatness of this country consisted in subduing nature; our glory as a nation today is commensurate with our understanding of how deeply our actions effect nature and making a conscionable effort to prevent its mindless destruction. Chief Seattle summarizes this greatest of all threats we face today with these immortal words: "Whatever befalls the earth, befalls the sons and daughters of the earth. We did not weave the web of life. We are merely a strand in it. Whatever we do to the web we do to ourselves." (Individual, Osburn, ID - #A8307.70500)

#### **FOR THEIR NATURAL GRANDEUR AND BEAUTY**

To exclude merely 30% of America's wild national forests from logging, mining, and drilling is already a generous sacrifice of the lustrous heritage of the pristine New World which has shaped so much of American consciousness. And where the sense of the grandeur of our great nation's natural glory has fallen into disregard, it needs to be shored up and revitalized. How can we grow a proud people and expect them to invest in the preservation of the natural state of it that so impressed our forefathers and pioneers. If we become a people for whom that natural grandeur has been lost, we will lose a concrete seed which would have continually replanted a kind of pride of place the loss of which will leave us spiritually impoverished. We need, if anything, to heighten the pride of place that preserves and conserves and honors with the awe that our natural grandeur can still evoke. (Individual, Lexington, KY - #A244.70000)

I would just like to say that it is a true enjoyment to have vast areas to wander and hunt without roads. I enjoy a lot of activities in life that are in and amongst the general public however I do love to be able to break away and have space (a lot of it!) to myself. If you take this space away how could we ever get away to our more natural surroundings? My other point is we all know what will happen if you open these areas up with more roads, we will never be able to enjoy the freedom of roaming these unbroken forests and prairies again. Land is a limited resource and we should hold onto its natural beauty as long as we can. (Individual, Roseville, MN - #A4969.70300)

There is nothing more beautiful than camping in the national forests and not have to worry about ATVs or logging trucks disturbing our pristine forests. Please do not contribute to the destruction of our nation's natural beauty. (Individual, Louisville, CO - #A1917.70310)

I would also like to say that these forests and their ecosystems are a very important part of my life. I thrive on their natural beauty. Please take these comments and consequences of deforestation as seriously as I do. (Individual, Laramie, WY - #A1929.70310)

There is the plain old aspect of aesthetics. We just need to have some areas that are in their natural state. (Individual, Bozeman, MT - #A15403.70310)

#### **FOR THEIR INTRINSIC VALUE**

The true value of our forests lies not in industrial timber harvesting or in the creation of more agricultural tree farms but in the many benefits the forests give us as intact ecosystems - some of which can be assigned a monetary value and others (i.e., the experience of being in such places) which defy any simple method for inclusion in a cost-benefit analysis. (Individual, Coos Bay, OR - #A180.70500)

Our nation must work to maintain the value that is held in the simple knowledge that lands still exist free of human interference. (Individual, Dallas, TX - #A289.70500)

A forest should not be viewed in the same light as a field of corn. The corn was specifically put there by man for a specific purpose, whereas the forest was inherited with no specific purpose. It is an integral part of our home. We must treat it that way. (Individual, No Address - #A594.70500)

It seems to me that the economic values of these landscapes pale in comparison to their intrinsic values. No logging should be permitted unless for general forest health or in imminent danger of wildfire. Absolutely no drilling for oil or other natural fuels—it's time we utilize solar and wind power. The Roadless Area Conservation Rule preserves the recreational and environmental qualities we all enjoy and also provides the Forest Service with a reliable, sustained monetary income. (Individual, Cedar City, UT - #A865.70500)

It is time for our government to exercise a deeper strength and dignity of power that reflects our greater human awareness of the inherent value and the awe-inspiring beauty and magnificence of this part of life on earth. Please do not give in to those who look at such magnificence and can see only manufacturing materials and dollar signs. We cannot afford a government now with such limited vision. (Individual, Alexandria, VA - #A15814.70500)

#### **FOR THEIR REPLACEMENT VALUE**

Replacement value—roadless areas are finite. They can be eliminated in as little as a summer, but require decades-to-centuries to be recreated. Because they are vulnerable and important, they need protection. (Individual, Northridge, CA - #A21249.70000)

The ultimate consideration, to me, is the fact that no matter what values you associate with a roadless area, once a road incurs upon that area, the values are lost forever. This should be the cautionary guide you use to help you protect roadless values. (Individual, Lewiston, ID - #A29569.45100)

#### **FOR THEIR NON-MONETARY VALUES**

Knowing that there is something else out there, wildlife, in their natural habitat, knowing such beauty exists, FAR FAR outweighs the material goods that may come out of logging Alaska's wildlife. Can you just imagine a world, well it isn't getting too hard, but a world in which we have caged all remaining, suffering wildlife, and replaced it with virtual reality? Do you know the psychological consequences of cutting down our natural surroundings? Can you honestly say that, in your heart, you know that you are doing the right thing? . . . Just step back from your this-second-comfort-bond reality and take heart. Consider the possibilities of the beginning of compromise. Please, respect the wishes of millions (for, environmental concerns have grown ostensibly among the public, and are becoming a sincere, given interest of the citizens of the world). Thank you for opening your heart. (Individual, Schererville, IN - #A3790.70500)

Our present attitude of disregarding everything and anything of non-monetary value is getting completely out of hand. Please, let's keep something! (Individual, Bronx, NY - #A4296.70500)

What makes some of our natural areas also special is the distance between roads. I would love to see what happens in those places where there is little or no interference. Even if humans have limited access (non-motorized vehicles), no grazing, mining, logging, etc. I think humans can benefit in SO many ways. (I also do not believe that we should always and only be concerned about how humans benefit over and above all other life forms). Humans might benefit scientifically in being able to observe how plant and animal wildlife populations arise, dwell and vanish from areas. What happens when there are natural outbreaks of fire, insects, non-native species of plants and what species are benefited by those outbreaks? (Individual, No Address - #A4477.70500)

Tell the Forest Service that roadless areas are precious in their wild, natural condition, not just for wildlife, but for recreation, watershed values, biodiversity, and scenic splendor. (Individual, Murphys, CA - #A4809.70300)

Regarding the Forest Service balancing competing values and limited resources, the Forest Service should remember that roadless areas are a limited resource. Logging, mining, oil and gas development and their associated infrastructure (roads) are single uses pushing out all other values of clean water and air, open space, wildlife winter and summer range, solitude and yes, that favorite place in the Wind River Mountains some “local” told us about. (Individual, No Address - #A4523.70500)

#### **FOR THE AMERICAN EXPERIENCE**

There is an ever-shrinking inventory of wilderness in the country. In most of Europe, there is no such thing as wilderness, and to follow their lead in the name of “progress” would be a serious and unrecoverable error, one which our descendants will one day curse us for. The preservation of what little wilderness that remains in the US is essential to the preservation of the American experience. Even people who never go to the wilderness are enriched by the knowledge that it is there, as Wallace Stegner so eloquently wrote. (Individual, No Address, #A470.70300)

As a Native American let us keep this land so all of us can use it. Hunting, fishing, camping. And keep big business out of it, this belongs to all of us free people. I am also a W. War Two veteran who has paid the price in keeping America a free land to live in. (Individual, Kalamazoo, MI - #A7203.70000)

Cultural value- wilderness is an American idea of one of our greatest exports. Vast roadless areas built the national character, influenced our expansionist history, and our writers like Cooper, Emerson, Thoreau, and Leopold. The continued loss of roadless areas breaks our links with our history and our sense of identity as Americans. (Individual, No Address - #A12601.70200)

Bush’s devious manipulation of the Clinton Roadless Area Conservation Rule is a disgrace to our national honor and its cherished legacy of wilderness protection—one of America’s greatest contributions to world culture—and the right of every American to inherit that legacy. (Individual, Osburn, ID - #A8307.70400)

#### **FOR THE WESTERN EXPERIENCE**

I sincerely feel that the Roadless initiative is the only and best way to preserve the Montana lifestyle and beauty that we love. Eventually, if we don’t preserve it the way it is, Montana will be like all the other overpopulated, wildlife scarce states that are nothing but roads, factories, houses etc. Preserve our Montana heritage!! (Individual, Polson, MT - #A5800.70300)

#### **FOR THEIR FREEDOM VALUE**

Freedom value—in his novel 1984, George Orwell’s totalitarian dictator “Big Brother” made the elimination of wilderness his top priority. Wilderness was a place where thought could not be monitored or controlled, and therefore represented a threat to the regime. (Individual, Northridge, CA - #A21249.70000)

#### **FOR RURAL COMMUNITIES’ QUALITY OF LIFE**

Rural communities next to National Forests have something that no amount of money can buy. Please live near the forests for the quality of life, not the profit. (Individual, Bozeman, MT - #A284.70300)

The San Juan National Forest contains 500,000 acres of inventoried roadless areas. These include the largest single non-wilderness roadless area in the Southern Rockies—the 150,000-acre Hermosa Roadless Area. Hermosa is one of the most popular backcountry recreation areas in the entire state. The area is used by a wide variety of backcountry users, and the Hermosa Creek Trail is a widely advertised single-track trail for mountain bicycling. Hermosa includes start of the highly popular Colorado Trail, which winds 470 miles through Colorado from Durango to Denver. The Colorado Trail begins along Junction Creek on the outskirts of Durango, and heads into the high alpine country of the La Plata Mountains and the heart of the Hermosa Roadless Areas. Hermosa is only the best-known of numerous backcountry recreation areas located on national forest lands near local communities in southwest Colorado. The presence of these primitive recreation opportunities on national forest roadless lands next

to local communities is an extremely important factor in the quality of life for local residents. The Haflin Creek, Missionary Ridge, First Fork, and Red Creek Trails are all located in a national forest wilderness area within 10 miles of Durango, for example. (Individual, Durango, CO - #A11655.70300)

#### **FOR OVERALL QUALITY OF LIFE**

One of the major characteristics of roadless areas is the high quality of life that they provide to Americans. Quality of life attributes attract businesses, commuters, retirees, and other non-local wage earners. Because private lands are generally managed for commodity extraction and with little foresight or broad analysis, the burden of providing these quality of life attributes falls on the public lands network. A recent poll conducted by the Mellman Group, Inc. and commissioned by the Heritage Forest Campaign, the National Audubon Society, and The Wilderness Society found that 63 percent of Americans support a proposal to permanently protect all unroaded areas 1,000 acres or greater on public lands. Only six percent of those surveyed thought too much land was already protected. The segment of society that is moving to regions for their wilderness and quality of life values, clearly, wants to see the area they are moving to protected. (Organization, Portland, OR - #A12004.70300)

New Hampshire is the proud home of the White Mountains National Forest which provides solitude and recreational values for our residents, along with the residents of several other states who travel here every year to enjoy the White Mountains. In fact, more people visit *our* National Forest every year than the combined number of visitors to Yosemite and Yellowstone. Residents of states with no national forests depend on the government to protect such places, along with seashores, wilderness areas and sites vital to our common history. These areas have been set aside and preserved for everyone to experience and enjoy. The Roadless Area Conservation Rule, as it is written in the January Record of Decision is already a compromise, and ensures the same status is given to the remaining unspoiled 31 percent of our national forests, while leaving more than half open to logging, mining and drilling. (Elected Official, State of New Hampshire - #A22595.70300)

#### **FOR TRUE CONSERVATIVE VALUES**

True conservatives value stewardship and saving for the future. Since the days of Theodore Roosevelt, true conservatives have supported protection of our beautiful natural heritage for future generations. Roadless areas are America's last wild places. These pristine lands provide clean water, wildlife habitat, and great opportunities for hunting, fishing, hiking, and other recreation. If we lose our last wild places to bulldozers, they will be lost for good. (Individual, San Diego, CA - #A23757.70400)

#### **FOR SPIRITUAL RENEWAL**

The forests are our children's heritage. The forests are our spiritual connection with our planet. If we allow them to be plundered for the sake of big business, we are committing a very slow and painful suicide. We will lose our humanity and our ability to care. (Individual, Red Lion, PA - #A1900.70000)

51% of America's National Forests are already open to logging, mining, and drilling. This policy represents a balanced approach to managing our National Forests by protecting the remaining 31 percent. The Roadless Area Conservation Policy was developed to ensure the last remaining 31% of unspoiled National Forest lands are preserved for the enjoyment and use of all Americans. These treasured lands provide a recreational and spiritual escape for all Americans. (Individual, Portland, OR - #A3678.70000)

This forest is important due to the enormous size and age of its trees. From the Pope to the Dalai Lama, you will find serious established religions encourage the experience of the immensity of the natural world, and the protection of the natural environment. Entering this park is like visiting the Cathedral at Chartres, or our own St. John the Divine. It allows you to feel connected to something much bigger than you are, and this is a wonderful thing for many human beings, and always has been. A huge living cathedral is very special indeed, rare in the world, incomparably valuable—compared to the need for more decks and lawn furniture, headed eventually to some landfill. (Individual, No Address - #A491.70330)

I am a Protestant clergywoman who believes that we need to keep some lands from our intrusion so that we can enjoy them as God made them. (Individual, New York, NY - #A633.70330)

Spiritual values are present in the forest for both Native Americans and others. As a mainly urban society, cut off from our root connections to nature, these forests will serve to renew our spirits. (Organization, Cookeville, TN - #A5451.70330)

#### **TO UPHOLD RELIGIOUS TENETS**

Our Torah teaches us that it is forbidden to kill a species and commands us to choose life. The Central Conference of American Rabbis, the largest rabbinic assembly in our country, in a March 2000 resolution, reminds us that we are called upon: “to serve as protectors and defenders of God’s magnificent creations” and “to safeguard and weave together the patchwork of remnant forests as best we can.” (Individual, Walnut Creek, CA - #A1101.70330)

Bush has promoted the importance of upholding Christian and diverse religious values. Even before God gave the Ten Commandments to Moses, He made a covenant with Adam and Eve to keep the garden—to care for all His creation. This is one of the highest callings of any faith. Ecumenical Patriarch, Bartholomew I, spiritual leader of the world’s 250 million Orthodox Christians, proclaims that “To commit a crime against nature is a sin. For humans to cause species to become extinct and to destroy the biological diversity of God’s creation; for humans to degrade the integrity of the earth by causing changes in its climate by stripping the earth of its natural forests, or destroying its wetlands; for humans to contaminate the earth’s water, its land, its air and its life with poisonous substances—these are sins.” Pope John Paul II calls our Godless, materialistic society the “culture of death.” The slaughter of innocent nature confirms this as much as any social problems. One of the greatest holocausts of the Twentieth century has been the ruthless and arrogant clear cutting of our National Forests and the corresponding global deforestation by multinational corporations, which has led to the highest extinction rate civilization has ever known. (Individual, Osburn, ID - #A8307.70330)

Let’s keep the wild outdoors, God’s great outdoors and leave things the way that God meant for it to be wild!! (Individual, Lineville, AL - #A12276.70330)

Along with other Christians and Jews I have been praying and fasting for these roadless areas to not be defiled. Instead please set aside these areas as sanctuaries which testify to the glorious handiwork of our Creator. In the least, let us leave them for our children to better learn how nature operates, to recreate and refresh their bodies and spirits in, and to have the opportunity to decide for themselves, when they grow up and are in charge, how this land should be managed. We have been praying and fasting together to PETITION our God to conserve our national Roadless Areas on the public’s lands by protecting them from human exploitation. We have been CONFESSING our greed and ignorance that has resulted in so much destruction in our nation’s forests. We have been MOURNING the consequent suffering and loss of life therein. We have been REPENTING of this sin by seeking to halt the destruction of Roadless Areas and instead of exploiting these pristine places, we have been working to restore—with the help of Almighty God—the public forests which have already been damaged. We are calling the Christians among your and President Bush’s administration to WORSHIP God by honoring Jesus Christ through whom and for whom all created things were made (Colossians 1: 16-17) and by whose blood shed on the cross all things will be reconciled to God (1:19). (Individual, Saint Paul, MN - #A19042.7033)

#### **FOR ESCAPE FROM MODERN PRESSURES**

I am a frequent user of our National Forest lands, hunting, fishing, hiking, and camping and would like to keep as many of the currently roadless areas roadless for future generations to enjoy. Nothing is more enjoyable than to walk into an area void of normal human activity and escape modern pressures and get a small glimpse into the natural past of our nation’s wild areas. (Individual, South Point, OH - #A4198.70000)

Keep our roadless forest roadless. In this high tech world where even small children are wired to the hilt with cell phones, PCs, PDA, FAXs, are driving ATVs, motorcycles - let us keep these places natural-native. If for nothing else as an example of what the world was like before the Internet, bar codes and gas powered vehicles. Don't get me wrong I like technology and use it but I also like some down time, some peace and quiet. Keep the "wild" in wilderness. (Individual, No Address - #A339.70300)

It is bad enough that the thousands of government related forms and assorted paperwork require the demise of millions of trees each year just to produce the paper necessary to print them on, but this frontal attack on America's National Forest lands is adding insult to injury. If you truly doubt the importance of preserving these forests, then I ask you to personally spend a full day (24 hours) within one of the threatened areas. Be there when the first glimmers of sunlight filter through the deep green foliage, watch Nature's wildlife as they scurry around searching for bits of food and/or just playing among the leaves and branches, and stay long enough to observe as the evening shadows fall and the moon and stars appear in the sky: Open your mind and your spirit to the unique peace that is found in very few places in our hectic lives. If, after 24 hours in this calm, peaceful, secluded wilderness, you can return to the hustle and bustle of the city, pass a road construction area, and truly believe in your heart that the rumble of heavy equipment would indeed be beneficial to the serenity of the forest, then may whatever God you believe in, have mercy on your soul. In the words of the songwriters, "Don't it always seem to go that we don't know what we've got 'til it's gone . . ." Be sure that YOU know what we've got before YOU contribute to its being gone. (Individual, Milton, FL - #A1298.70300)

#### **FOR ESCAPE FROM CAPITALISM**

Forests serve as a place of respite from the grinding capitalism that surrounds us every day. Please, I beg you, leave this last remnant of our country's wilderness as it is. Once these forests are opened up to logging and mining, they will be plundered by self-seeking, aggressive folks as surely as have all other forests with road access. I live most of the time here in Massachusetts, but every chance I get I head up to New Hampshire or Maine. These forests are a huge chunk of my delight in living, my favorite places to walk and just to be. It is simply unthinkable that they should be exploited, developed, stripped of their beauty. (Individual, Cambridge, MA - #A6268.70300)

#### **FOR SOLITUDE**

Roadless areas are important to hikers seeking undisturbed, scenic landscapes and solitude in wild backcountry and outstanding natural areas. Roadless areas are also critical for ecosystem protection, including water quality, wildlife, and vegetation—all valued pieces of the hiking experience. (Individual, Sebastopol, CA - #A5115.70000)

#### **FOR NATURAL QUIET**

I have been to the BWCA for about 25 years plus several years in the Quetico. The "silence" is marvelous—it leaves plenty of room to hear the loons and to see moose "playing" in shallow water; and enjoying "listening" to the wind, looking at the stars and sunsets. (Individual, Milwaukee, WI - #A8098.70320)

Like Aldo Leopold, Henry D Thoreau, and many others, I require wilderness, wilderness, wild nature. And places clean, with solitude. There are precious few such places. I go to, e.g., to a waterfall some miles from US28, select a high rock with a good view, and prepare myself for a time of quiet and recreation. But in the distance or even nearby I hear ATVs, vehicles, airplanes, chain saws, radios, boom boxes. And I live surrounded by Monongahela, George Washington and Jefferson National Forests. (Individual, Bartow, WV #A8759.70320)

Our population continues to demonstrate by its use patterns that people need quiet, wild places to visit to regenerate themselves physically, mentally and spiritually. We are on the right track toward accomplishing this most important goal. I implore you to keep us moving steadfastly in that direction. (Individual, Charlottesville, VA - #A4886.70300)

There is no necessary hierarchy of values inhering in and services provided by roadless areas, so my list is not necessarily in rank order from highest to less high: . . . Quiet. Something so rare that finding it in a wild area is even surprising. Quiet is not soundless but includes the sound of falling water, singing and twittering birds, the rustle of trouser legs and boots on bushes, but it ends with the racket of gunned engines and the clank of machinery. (Individual, Big Fork, MT - #A17221.45100)

#### **FOR THEIR ABILITY TO REVEAL THE INTERCONNECTEDNESS OF HUMANS AND NATURE**

Wild areas make our interconnectedness to other life forms evident and take us out of ourselves to see our place in the whole. (Individual, Westfield, NY - #A14074.70000)

There are few places left in this country, where a person may go and listen to the Earth's voice. To be able to stand on the edge of a ridge top and see nothing of man. I have, as a child, been to places like that. Many of those areas are now resorts, housing developments, or cities. I feel that a species that cut itself off from Nature, as She decides to grow and develop, is a small and futile species. When you cut the foundation out from under something, it weakens it. Nature is our foundation and in all times past, our strength. (Individual, Houston, TX - #A1372.70300)

Much of our culture is focused on immediate gratification and material goods to the detriment of our psychological health and our relationship with the earth. We need the Forest Service's assistance in taking the long-term view of a protective stewardship of the earth and the deeper satisfactions of a quiet, respectful, harmonious relationship with the natural world. (Individual, Needham, MA - #A15773.70000)

#### **FOR THE PERSONAL CHALLENGE IN THEIR INACCESSIBILITY**

The natural barriers that the land presents to those who would enjoy them are their greatest blessing and benefit. I can personally relate to this concept, as I recently returned from one of the most physically challenging trips to the Boundary Waters Canoe Area Wilderness in early August.

Despite these challenges, including injuring my back on the return trip and having to paddle and portage through it, this was probably one of the best trips we have ever experienced. The heart-to-heart talks I enjoyed with my son, cuddling up together in our sleeping bags, are a priceless treasure. Where else but in the wilderness could I tell my son that even though I would not always be with him in life, these times we shared would be? Where else could those bonds be experienced and tested?

The wilderness has a value, but its price cannot be measured in human terms. Its chief value is in its remoteness and the challenges it presents to those who would experience its wonders—not in its accessibility. Please preserve its wildness and pristine beauty for all to enjoy, both now and long into the future. (Individual, Roseville, MN - #A16399.70000)

#### **FOR ESCAPE FROM MOTORIZED VEHICLES**

This rule is important to me as a commercial outfitter and outdoors tour guide. I use public lands for low-impact hiking tours for persons of all ages. My focus is on education of the public on public lands issues, local flora and fauna, history and archeology of the Rio Grande National Forest and adjacent areas. The only man-made sounds we encounter are airplanes flying overhead. For my guests, this is a relief to be away from the noises and pollutants perpetuated by motorized vehicles. (Individual, Del Norte, CO - #A5289.70300)

I live close to the BWCA [Boundary Waters Canoe Area]. Last fall I went on a canoe trip in this relatively small but popular wilderness area. I camped at a beautiful spot on a lake sitting on an island of granite. For a while I thought I found silence and escaped the motorized world then I heard motors in the distance. You can't even go to the BWCA and not hear motors. (Individual, Eveleth, MN - #A5766.70320)

We need more places to hike and get away from their obnoxious abominations of sno-cats and A.T.V.s and their noise and pollution. (Phoenix, AZ - #A6523.70300)

### FOR FAMILY TOGETHERNESS

My fondest memories are the times spent with my father in the wilderness areas of the National Parks system. No vehicles or radios gave me time to know my father better. A million sons need this time away from the cities with their dads. (Individual, Dallas, TX - #A4206.70340)

I live in northern Utah, but I have visited the forests in both northern Utah and Montana with my family. Roadless areas are important to me and my family because being in them has healed us mentally, spiritually, and physically as individuals and as a family. Going out in those forests has literally kept our family together by healing us because of the awe and wonder they have provided. As I mentioned in a previous letter, going out into our wild forests has also brought us closer to our Creator and has given us hope in life and faith to continue on. Our administration says that it is for family values. Protecting our natural areas, including our roadless forest lands will help to protect wholesome family values by keeping families together. I can personally bear strong testimony of that. (Individual, Kaysville, UT - #A5231.70340)

Entering into the natural world on its own terms, by foot or paddle craft, has been the bedrock of our family vacations for two decades, and for my family of origin for three decades before that. Time spent in natural beauty is one of the strongest builders of "family values" available in our culture today and economic development has eliminated vast amounts of that natural beauty during my lifetime. (Individual, Needham, MA - #A15773.70340)

These areas are important to me not just to look at, but to use. I have backcountry skied, climbed, and backpacked extensively in Colorado, Utah, Wyoming, New England, Maryland, Virginia, and Washington State. Since I moved to Colorado in 1984, my wife and I have sought out roadless areas all over the west as places to spend our vacation time. Our climbing and backpacking trips have brought many memories with friends and families. I'm now at a time in my life where I want to share this with my 5-year old daughter. We have taken her backpacking in Washington State and Colorado. Therefore the Wilderness areas, the National Parks and the roadless areas of our nation are very important to me. All of them are, not just the local ones, because I use them and I see myself using them even more in the future. (Individual, Glenwood Springs, Co - #A17313.70000)

### FOR HUMAN SUSTENANCE

Our family uses and values roadless lands. Our wild game which we use for sustenance comes from wild lands, as does our drinking and municipal water. My four year old daughter and eight year old son frequently walk or snowshoe into roadless national forest areas of Montana and Wyoming. Lazy men who say they need yet more roads (and ORVs) lack credibility and perspective. (Individual, Helena, MT - #A1717.70300)

### FOR HUMAN SURVIVAL

The evaluation of uses of roadless areas should not be reduced to simply economic evaluation. As our population grows, development will encroach on those areas which are undeveloped and unprotected, thus putting additional pressure on the remaining undeveloped areas which have protection. In addition, we need only look at what transpired on Easter Island to see what happens when over utilization of the natural resources occur. (Individual, Troy, IL - #A6981.70500)

It is time that we begin stewardship of the greatest gift we have, the air we breathe and the naturalized planet that provides us with it. Continued destruction of natural areas will only have ill effects on our health and longevity as a species. (Individual, Silver Spring, MD - #A7905.70300)

How enriched my life has been from witnessing 7 bald eagles in their natural habitat. How much more respect I have for nature (forests, mountains) and wildlife. We cannot sell these things out for the sake of oil or timber. If we do, we will not only lose our forests, mountains, wildlife we also will lose mankind

for each is codependent on the other. Man cannot exist without nature and nature cannot exist without man. (Individual, Dracut, MA - #A6220.70000)

#### **FOR SCIENTIFIC RESEARCH**

Roadless areas: Offer opportunities for scientific study and research. (Individual, Olympia, WA - #A4959.70300)

People need these areas so they can compare with the managed areas of the past. (Individual, Lamona, WA - #A5460.70300)

Social and economic values are immensely enhanced by and near such climax forests. . . . Such forests provide an immensely valuable scientific laboratory where discoveries of nature's processes lead to enhancements to civilization such as new medicines. (Individual, Salem, NH - #A8263.70000)

There are tremendous environmental, social, and cultural values associated with roadless areas. These include: (1) scientific value—they provide the only meaningful baseline against which forest management can be evaluated. (Individual, Northridge, CA - #A21249.70000)

### **703. Public Concern: The Forest Service should protect roadless areas.**

#### **DUE TO INCREASED POPULATION**

There are many reasons why I believe protecting roadless areas is the very best thing to do for health of this planet. The population is growing rapidly. (Individual, Lafayette, CO - #A807.70100)

At every opportunity I make a trip to my home state to regenerate in the Wasatch and Uinta mountain ranges. With increasing population growth it is imperative it seems to me to preserve and maintain roadless areas as roadless and wilderness areas. (Individual, Aubrey, TX - #A15526.70100)

Over the years, I have seen the impacts of population growth on the fragile ecosystems of our wilderness areas, and it is a disheartening sign of things to come as more and more people use the resources of our National Forests, be it recreational or commercial. Removing the Roadless Policy would be an irreversible action that would open up these areas and spoil these natural sanctuaries, I believe. (Individual, Broomfield, CO - #A6301.70100)

Washington State's population growth is burgeoning and many of the roadless areas contain trails that are used by our many new hikers. Mountain recreation is growing exponentially and many areas are very crowded. As sprawl envelopes the country we should be banking these areas for future generations. Let's put "conservation back into "conservative" and be a model for a world that is fast being trashed. (Individual, Seattle, WA - #A7086.70100)

#### **DUE TO THE HIGH NUMBER OF IMMIGRANTS**

I am writing to request that no changes be proposed or made in the present roadless policy. As additional hundreds of millions of immigrants, both legal and illegal, enter the U.S. in coming years we will need all the remaining unroaded wild lands that can possibly be saved. (Individual, West Linn, OR - #A687.70100)

It is imperative that the rules be unchanged when considering the immigration policy now in place and the unchecked flood of illegal immigration. A greater population will lead inevitably to greater environment damage. Please! Lets keep America Beautiful. (Individual, Yorba Linda, CA - #A3802.70100)

Since 1970 when I commented on the Rare II issue, this country's population has grown by 84 million. It will double by 2050, 90% due to our elected officials refusal to address immigration. This shortsighted population policy makes it imperative that we protect what little roadless areas are left. (Individual, Whitefish, MT - #A5594.70100)

The long term result of opening roadless areas and the wilderness involves some thinking. Firstly, should roads increase in the backwoods, the wilderness will gradually fragment as it is segmented piece by piece. Slowly at first for sure, which is why the short-term extraction profits are appealing right now, but add the projected, immigrant population growth for North America from places like Asia and Mexico and Latin America over the next 10-30 years (a factor short-term extraction industries or track-housing developers rarely consider), and that roadless areas/wilderness fragmentation will increase proportionally as the ecosystems are torn down for living space and urban sprawl. If you doubt that many immigrants are coming, please look at Vancouver, British Columbia and note the impact of surround, once roadless areas now being opened and cleared for an exploding Chinese population. The Chinese flee to Japan to make money with one goal in mind: to emigrate from China and immigrate to the space and 'freedom' of North American through Canada (permanent visa status for Chinese coming to America is still very difficult to obtain; Canada welcomes Chinese and immigrants with easy permanent visa requirements). A quick look at migration patterns across the globe will alert the Forest Service to this trend and, though the emphasis of the Forest Service these days mirrors the goals of a business, the fundamental paradox of capitalism no country can escape is that economic development erodes its own ecological base. (Individual, Saitama, Japan - #A26099.50300)

#### **DUE TO URBAN/SUBURBAN SPRAWL**

We simply must face the problem of urban/suburban sprawl and the need to cut back on our energy consumption or the cost will be great. If you think the short term slow down in productivity or economic strain is tough, just wait! Cleaning up the environment may very well bankrupt this country in the future. Or, we can simply decide human life is less valuable than once believed. Cancer, loss of clean air, and polluted waters are what we shall sow if ecologically sound principles are not followed. One key thing we can do is keep wilderness wild. Set aside what we can for now and for future generations. I endorse this roadless policy and know most Americans do also. Let's not let special interests supporting so-called wise-use (sic, develop and harvest it!) dictate our nation's environmental policy. (Individual, Bellingham, WA - #A1909.70100)

Dealing with the impact of growth is the number issue here in Colorado. My constituents fear losing the great quality of life we have. They recognize the importance of being good stewards of our natural resources and open spaces. They understand if we want clean air, clean water, thriving wildlife, we must be proactive with the necessary legislation and rules needed to protect and preserve what we have for generations who will follow. (Elected Official, State of Colorado - #A11820.70300)

More roads are just another form of urban sprawl. Forest animals do not need the noise and trouble brought to them by more roads. (Individual, Providence, RI - #A11478.70110)

I am all for increasing as much undisturbed forest lands as possible. I am in the building industry (house design) and believe developments can be much more concentrated with less sprawl. I know development does not affect much of the forest service property (at present). (Individual, Brevard, NC - #A151.70110)

The most spectacular characteristic of our great nation is its enormous stands of wild national forests. It literally breaks my heart to see them disappearing and concrete and asphalt replacing them. I live in the northwest and the trees are there one day and gone the next. I am angered and disappointed by this reckless use of one of God's greatest gifts to us . . . the BEAUTY OF HIS CREATION! We already have more new houses built than we can ever fill, and while they may be attractive places to live they

will NEVER compare to the beauty of a stand of an old growth conifer forest. (Individual, Vancouver, WA - #A1488.70300)

One of the greatest hindrances to effective forest management is encroachment of residential development into forested areas adjacent to public lands. This increases the difficulty of using prescribed fire and mechanical thinning to control fuel buildup, increases the risk of human carelessness causing fires which spread to the public lands, and increases the political fallout if fire crosses from public to private land. This issue should be addressed by funding development of guidelines and specialist teams to work with state and local authorities to put in place land use policies that keep development out of forested areas and away from public land boundaries. (Individual, Dallas, OR - #A3697.70110)

**704. Public Concern: The Forest Service should work with other government officials to promote population control.**

Please recognize that this issue is only one more symptom of a world out of control. We are beset by a host of environmental and social problems. They are solvable only if we recognize that overpopulation is at the root of them all. Please work with other government officials to help women—both domestically and abroad—learn about and control their own fertility. (Individual, Candler, NC - #A3068.70100)

**705. Public Concern: The Forest Service should not implement a national roadless rule.**

**BECAUSE ROADLESS AREAS HAVE NO INTRINSIC VALUE**

What values are there to consider in roadless areas. They have no value at all if there is no access. They are worthless except to a few greedy people who will only use that area to hike or camp in maybe once in a lifetime if at all. It can't be cleaned up with no roads in it, so you will be wasting your time cleaning up areas next to it, if a fire breaks out it will burn all areas anyway. (Individual, Escalante, UT - #A20305.45100)

**BECAUSE IT THREATENS WESTERN TRADITIONS AND CULTURE**

We are concerned about the protection of our western culture. This culture is characterized by access to the land for multiple-uses, friendliness, good neighborliness, and sharing. Motorized access to the land provides opportunities for sightseeing, exploring, weekend drives and picnics, hiking, skiing, mountain biking, riding horses, camping, hunting, fishing, viewing wildlife, OHV recreation, snowmobiling, gathering of firewood and natural foods, and physically challenged visitors who must use wheeled vehicles to visit public lands. Our observations indicate that over 90% of the visitors to the forest are within these profiles and rely on motorized access for their visits. We are fortunate to have extensive public lands to support the western culture. Western culture must be protected. We respect the use of public lands by others but they cannot trample our rights in return. Multiple-use management principles will protect western culture and values and the decision-making should be based on implementing a multiple-use alternative. The document should evaluate the multiple-use measures required to protect western culture and values. (Organization, Helena, MT - #A13226.70200)

**BECAUSE IT RESTRICTS FAMILY STABILITY AND TOGETHERNESS**

My family enjoys off-road recreation. It is the only time we are able to spend the quality time together they deserve. I am also able to teach the children about the environment and the outdoors. We have played together generation by generation and our family continues to stay together. We have learned through off-road recreation how to stay close and keep family a priority. Don't close the land, my family depends on it to keep us together. (Individual, No Address - #A567.70340)

Taking the experience of the family camping away will soon affect the family experience and will further reduce the morals and ethics of the future children. (Individual, West Jordan, UT - #A711.70340)

The forests belong to the people and the people in family units do in fact need to use the forests to the greater extent possible. By allowing the use of the forests in family units (whether it be a family of one, two, or five, etc.) the crime rates [that] result from inactivity or economics, could be drastically reduced both in and out of the cities. (Individual, Maricopa, CA - #A3732.70310)

There are many young families who belong to our club and enjoy snowmobiling as a family sport on federal lands. We know many other families who belong to the four-wheeler club. It is great to see these families enjoying the land and teaching their children to be responsible citizens. Please do not deny any of us access to those lands. (Individual, Riverton, WY - #A27896.70340)

Politicians talk about the American family and family values. I guess this must just be the current buzzword for the campaign trail. Because if any politician were to spend a weekend out in the desert or forest with the off-road community they would see Dad, Mom and the little one all gathered together, building a strong family bond. Enjoying the outdoors! They're not home doing one thing while the kids are watching all the crap on TV. They are out around the campfire, sharing their outdoor experience with one another. And you want to take this away. Just think in a couple of years they'll have to put together some type of environmental group to resurrect the soon to be extinct group know as the off-road community . . . Kind of like the spotted owl. (Individual, Valencia, CA - #A26162.70340)

#### **BECAUSE IT REDUCES MOTORIZED USERS' QUALITY OF LIFE**

Forest visitors use all of the motorized roads and trails that exist today. The use of this network of motorized roads and trails is part of local culture, pioneer spirit, and local tradition. The quality of life for the multiple-use public is being impacted by the cumulative effects of all motorized access closures. The significant closing of motorized routes in the project area does not meet the basic requirement of the NEPA act of 1969 as stated in "Sec. 101 (b) (5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities." A high standard of living includes recreation opportunities that meet the needs of motorized visitors. We do not understand why this area and many others in the National Forest cannot be shared with all forest visitors. The environmental document must evaluate the current allocation of motorized versus non-motorized recreation and access opportunities in the National Forest. A fair allocation would be based on meeting the needs of non-motorized and motorized visitors equally. The decision-making must provide for a high standard of living and equivalence in quality and opportunity for motorized visitors in comparison to non-motorized visitors. The environmental document must evaluate the impact of this proposed action and the cumulative impact of other decisions on environmental justice and the standards of living for multiple-use and motorized visitors. (Organization, Helena, MT - #A13226.70300)

#### **BECAUSE IT RUNS COUNTER TO AMERICA'S MODERN, FAST-PACED LIFESTYLE**

We live in a society where everyone lives by the clock. We are all trying to cram our recreation time into as efficient a package as possible. We are also living in a continually advancing technological atmosphere where faster and more efficient transportation is required to compete with the ticking of the clock. Common sense dictates that more of public land, as opposed to less, must be open to motorized transportation. The more time that passes, the more this will become what is needed to provide busy Americans with a positive outdoor experience. It may take 2 days to hike into a remote area to camp, and 2 days to hike out. That leaves 3 days for camping. The same remote area could be accessed by ATV in a few hours, leaving considerably more time to camp, with considerably less physical effort. This would allow the less than able-bodied citizens the same opportunities as the more physically fit. Ever tried to hike a couple miles toting 3 kids? Not a pretty site. Family outdoor recreation is being killed by these roadless designations. The young, able bodied, single enthusiast is being given more and more opportunities while the family is losing out. Who is going to look after our lands when these able greedy enthusiasts are through? The kids, I think we need to get the kids involved while they are young to foster future stewardship. (Organization, No Address - #A26800.70000)

**BECAUSE A WILDERNESS EXPERIENCE IS NO LONGER POSSIBLE DUE TO TECHNOLOGY**

Eliminate the notion of “Wilderness experience,” which really can’t be had due to cell phones, spy satellites, helicopters, medicine, hunting and fishing restrictions, fire use restrictions, convenient man-made backpacking equipment, et al. (Individual, Greeley, CO - #A28995.70300)

**BECAUSE IT WILL CAUSE EMOTIONAL DISTRESS TO MINING INDUSTRY EMPLOYEES DUE TO LOSS OF CONTACT WITH NATURE**

Many of our members, especially exploration geologists and drillers, entered their professions because of the opportunities to work close to nature. They pride themselves on being able to practice their respective arts in an environmentally responsible manner so they will not interfere with other long-term uses and values. These members and their families living in neighboring communities affected by the January 12 rule also would suffer extreme emotional distress, as well as a deep philosophical and cultural loss, by being prevented from enjoying existing and newly declared Roadless Areas in the same manner as they have for as long as six generations. Such a human toll cannot be measured in dollars. (Association, Spokane, WA - #A17351.70200)

**706. Public Concern: The Forest Service should ensure that activities on private inholdings are compatible with the social values associated with surrounding lands.**

Even the most broad property rights are not absolute, and need to be consistent with public responsibilities. Property rights regimes are a human construct, an overlay on underlying ecosystems. Activities on private inholdings must be compatible with the social values associated with surrounding lands, just as they are in more populated areas. (Individual, Corvallis, OR - #A650.70000)

*Bequest Values***707. Public Concern: The Forest Service should protect roadless areas for future generations.**

Seeing these remaining roadless areas (or just knowing they exist) has value to many Americans. This value however is not measured in terms of profit margins or portfolio balances but rather in a legacy that this generation can pass on to future generations. We must move beyond the mind set that our western lands are still part of a frontier that needs to be developed by government subsidies to extraction industries. (Individual, Evergreen, CO - #A430.70000)

It is the mission of the Forest Service to preserve and maintain the land set-aside by our government for preservation, conservation, and educational purposes. If we are to leave any part of the grandeur and magnificence that is so integral to the American spirit to future generations, we must allow the forest Service adequate room to fulfill the mission set before it. The Roadless Area Conservation Rule provides this room. Do not limit the ability of the Forest Service to preserve lands for the benefits of generations of Americans to come. (Individual, Conyers, GA - #A342.70400)

I am too old to be concerned about the welfare of our roadless areas - Wilderness - for my own use or benefit, but I adamantly support the right of future generations to have that privilege. (Individual, Willmar, MN - #A16939.70400)

I urge you to adopt a second metric for forest use planning which concerns sustainability—maintain the Forest in a fashion that future generations of U.S. citizens have use of those lands just like percent generations do. (Individual, Boulder, CO - #A26916.70400)

Through four decades, over 250,000 Outward Bound students have experienced the challenge, risk and adventure of a wilderness education course in the American backcountry. They have come to know the risks and rewards that come from testing one’s limits in areas beyond the reach of modern convenience

and technology. Proper protection of our remaining roadless areas will enable future generations of young Americans share in the experience. (Permit Holder, Golden, CO - #A29630.70300)

I voted for President Bush. I consider myself a conservative. I believe that being a conservative must include a dedication to conserving our nation's total resources for future generations. To be truly responsible and honorable, each generation must leave our country, and the world as a whole, in at least as good condition as it was in when we received it in trust. We have not been doing so, and that is wrong. It is long past time for us to change our ways. We can and must find ways to do this that are economically responsible and democratic. (Individual, Hopkins, MN - #A191.70400)

#### **BY USING TREE FARMS FOR TIMBER NEEDS**

The biggest consideration is that pristine areas of our National Forest are disappearing and will not be there for future generations. There are plenty of places to log, ever hear of tree farms. Try South Georgia or north Florida. They seem to be doing fine. (Individual, Atlanta, GA - #A4509.70400)

#### **708. Public Concern: The Forest Service should continue traditional multiple use management of roadless areas for future generations.**

I want my 2 and 4 year old Georgia grandsons to be able to visit their "papa" and enjoy backcountry fourwheeling, fishing and camping—responsibly! and that means continued access to our public lands. (Individual, Larkspur, CO - #A18020.70400)

I support the repeal of the inventoried roadless areas. I've lived in Utah for my entire life. I grew up playing in the mountains, camping, fishing, hunting, four-wheeling, hiking, and just driving the roads. I'd like my future children and grandchildren to grow-up being able to do the same. For this to happen the forest needs to be managed and protected, but this is going too far. (Individual, Tooele, UT - #A12640.70300)

#### **709. Public Concern: The Forest Service should protect national forests for the present population.**

Forget the "we need to leave something for our grandchildren" way of thinking. We need to give ourselves something. For many people, a trip to a National Forest is the only wildlife they experience. Capitalism is fine and good but do we really need a McDonald's on every corner? (Individual, San Antonio, TX - #A1185.70320)

#### **710. Public Concern: The Forest Service should exploit national forest resources for the present population.**

The idea that millions of acres of our national forests must be completely road free is ridiculous. Road free for what? If we have no access to them, it's as if we have no forests at all. It flies in the face of good, common sense. Wilderness is of no use to anyone if people are taken out of the equation. The earth itself is a useless ball of wasted mass if people are not there to use its resources and to care for it. But care for it doesn't mean let it go unused and its resources wasted, supposedly saved for some unknown and unspecified generation. This generation is as important as any future generation, and should have full use of the forests throughout this generation, while preserving the renewable resources for future generations. (Individual, Manti, UT - #A27830.70500)

### *Educational Values*

#### **711. Public Concern: The Forest Service should consider the educational potential of remaining wild forests.**

I especially value the educational potential of our remaining wild forests, especially as our increasingly urban society grows increasingly disconnected from the natural processes that make life, as we know it possible. Without understanding and appreciation for the natural processes that sustain us, we lose our

ability to see the connections between healthy functioning ecosystems and our personal lives. This disconnection plays a significant role in the ecological crisis that we now face. Mass extinctions, air, water and soil pollution, and the general degradation of our living Earth are all symptoms of our loss of connection with the wild. Ultimately we must ask ourselves what kind of world we want to pass on to our children and grandchildren: a world homogenized and marginalized due to our shortsighted decisions to not protect our remaining wild lands; or a vibrantly diverse world where functioning ecosystems and protected wild forests are an integral part of our cultural heritage? (Professional Society, El Cajon, CA - #A5016.70000)

Within the Forest Service, the phrase "Recreation Opportunity Spectrum" is well known. For purposes of these comments "recreation" will be set aside to focus of the concept of the opportunity spectrum available in wilderness, roadless areas and other backcountry or non-developed venues. For Outward Bound, the issue is one of appropriate classroom space. For four decades, wilderness, primitive and roadless areas have been our classroom and teacher. In places such as Rocky Mountains of Colorado, the Cascades of Washington and Oregon, or the Sierras of California, Outward Bound has tapped the educational value of remote backcountry venues. Today, in all of these areas, Outward Bound is working to reduce our impacts on the wilderness classroom. This is particularly true in designated wilderness. Wilderness use is increasing. The capacity the Forest Service to effectively administer and manage these areas is declining. As a result, Outward Bound, and others like us, want to look, need to look, for a range of effective classrooms or program areas, including wilderness, primitive, roadless areas and others. Roadless areas have, can, and must continue to play a critical role in providing a spectrum, of backcountry opportunities and experience. (Permit Holder, Golden, CO - #A29630.70000)

**712. Public Concern: The Forest Service should educate children regarding our dependence on undisturbed natural systems.**

Please do not overturn a sensible ruling as a result of pressure from those who feel that a natural resource serves our purposes only, these are ignorant (yes I realize I may alienate some, but it really is a lack of education, as we should be educating our children in the ways in which we are dependent upon undisturbed natural systems for our life, this no one can deny) people concerned with profit for some company whose shareholders are of those ignorant masses. (Tribal Department, Mescalero, NM - #A4905.70500)

*Access for Special Populations*

**713. Public Concern: The Forest Service should not implement a national roadless rule that restricts access for the mobility-impaired.**

**THE ELDERLY**

I am 67 years old, I have been hunting and fishing in my tax supported national forests since I was 5 years old and I will continue. Just let me use the roads that are already there except in wilderness areas. Public lands should be accessible for senior citizens also. (Individual, Mesa, AZ - #A99.70700)

Please do not close forest roads. I am 65, retired and love to spend time out in the hills. I cannot hike like I did when I was 20, I need access by vehicle. I understand you are talking about closing roads (call them trails if you like) that I have used for 40 years. Access does not require a lot of maintenance, graveled and graded roads are not necessary in many cases. Contrary to the environmental groups, roads do not cause any significant damage. (Individual, Salt Lake City, UT - #A705.70700)

**THE DISABLED**

I am a Viet Nam Vet with some limited physical abilities. I believe that the recent conversion of public lands in the West to "wilderness" or "roadless" status has gone too far. I am supporting political groups and public groups that wish to stop the increased designation of "roadless" areas. I will also vote for public officers who agree with my stance. The only way I can visit and enjoy some of these areas is by

Jeep and I do not consider that an intrusion or damaging situation. (Individual, Aurora, CO - #A538.70700)

I help pay for the national lands and access for all is reasonable, even people like myself who have mild handicaps that limit how far we can walk. (Individual, No Address - #A917.70700)

I am strongly opposed to any actions that would reduce the accessibility of the national forest system in any way. Indeed my wife is handicapped with constant pain and limited motion. If our forestlands and parks are truly to be open to all people then please consider our position. The only way my wife and many other people will be able to enjoy these public lands is from the seat of a vehicle. These vehicles can only be useful if they have access. My family and I have dreams of travel to Yellowstone Park someday. With her discomfort during travel and the current status of massive crowds during the warmer months we are considering the winter as an alternative. I understand that the opportunity to do so may be limited to specialized mass transit vehicles or foot travel during the winter months. We do not consider this an acceptable alternative. (Individual, Brighton, MI - #A10549.70700)

I am very concerned for the proper management of the forest; for all outdoor users including the elderly and handicapped. I believe a scientifically managed program can be developed which includes a reasonable access for the elderly and handicapped. (Individual, Iron Mountain, MI - #A11408.70700)

I am a C-5 quadriplegic and I like to hunt and fish. I ride in a small trailer pulled by an ATV. This is the only way I can access the woods to hunt and fish. I'm not the only disabled person that hunts in this manner. A person that is a paraplegic can ride most ATV's but a quadriplegic like myself has to use trailers. Please keep this in mind when making new regulations. In Louisiana the Wildlife and Fisheries make special trails in the Wildlife Management Areas for disabled hunters and special places by streams, rivers, lakes and ponds for the disabled to fish. Without roads and trails the disabled hunter and fishermen are denied access to the woods and streams. Please keep this in mind. (Individual, Westwago, LA - #A7465.70700)

The Forest Service is under no legal obligation to provide handicapped access to the forest—a fact that was thrown in my face at least a dozen times. All “officials” were ambulatory, standing on two feet, and quite arrogant about a law they apparently memorized the night before. No one even offered a solution for my physically challenged readers. I guess the Forest Service’s “Roadless” initiative is above moral concern. There but for the grace of God go I. (Individual, Tucson, AZ - #A5278.70700)

#### **714. Public Concern: The Forest Service should not implement a national rule that closes existing roads.**

##### **BECAUSE IT WOULD RESTRICT ACCESS FOR THE MOBILITY-IMPAIRED**

I have been hunting and fishing the public lands all my life. I did so with my father and grandfather, and continue to do so with my wife and children. It would be outrageous if these lands were closed to vehicle access now. I am not requesting new roads, only that the current roads continue to be responsibly used and maintained. There are places that my father still loves to go and could not access any more without a vehicle. The same goes for my children. These are public lands and should remain public lands, access as is, and never denied as long as we, the sportsmen and women, the original and true conservationists of this nation, continue to use them. (Individual, Gardnerville, NV - #A4157.70700)

My legs and feet are not the best. The only access I have to these areas are through the old logging roads with my truck. It's breaking my heart to see favorite roads ripped out because someone doesn't like a quad runner or my truck. I am part of the public too and really resent having more of my freedoms removed. In this case it is my freedom of access. I desire to get into the back country also but because I can't walk 20 miles a day anymore, it's too bad? I can't walk on ripped out roads. My legs can't take

that terrain. I have walked many miles on old logging roads and marvel at the old cabins we find. Tearing out these roads narrows down the number of people who can use these areas. (Individual, Bountiful, UT - #A21161.70700)

### **715. Public Concern: The Forest Service should not use access for the elderly and disabled as an excuse to build roads in roadless areas.**

I grew up in the mountains of Montana and we visit there often. My wife and I enjoy hiking in the mountains but because of physical disabilities, we cannot hike as much. So we now see the “back country” by driving Forest Service roads. However, we do not want any more roads in our national forests. In fact, we would prefer that more roads were closed, even if it means that we will not be able to see as much. It is enough for us to know that the forests are protected. (Individual, Rockford, IL - #A6270.70700)

I do not buy the idea that handicapped persons need to ride motorbikes. I’m handicapped, too, have never been able to balance on a bike or motorbike; my ears are very sensitive to noise. (Individual, Tacoma, WA - #A11709.70700)

I’m 70 years old with bad knees, but I still want the existing roadless areas to remain roadless and would like to see more wilderness areas. (Individual, Fruita, CO - #A7591.70700)

Now a senior citizen, I still would prefer an easy hike into our beautiful backcountry, than taking a vehicle in with all its destructive impacts. The forests of Basalt Mountain are an example where one can drive fairly close by and then walk into still unspoiled forests which have not been marred by roads and vehicles. (Individual, Snowmass, CO - #A5718.70300)

The roadless policy would not close off any trails available for hiking, mountain biking, or horseback riding; that defines “reasonable access” in wilderness areas. Some have argued this policy would prevent handicapped people from accessing all National Forest lands; and we need to do a better job of making more areas already roaded accessible to them with trails they can use. But it is not possible for someone in a wheelchair to climb Mt. Everest, and no one is advocating a paved trail all the way to the top. There are some areas that are, by nature, wild—and should be left that way. (Individual, Cumming, GA - #A21156.70700)

Non-motorized recreation is a valid use of public land, and more and more people are seeking the solitude and quiet that roadless lands can offer. I am over 50 years old and intend to use public roadless lands by walking until I no longer can. Then I will be glad to know that they are still there and that the flora and fauna supported by such lands are still intact. I do not think I need to change the character of the land I love to insure my own “pleasure” as some motorized users apparently do. (Individual, Clancy, MT - #A17117.70320)

#### **BECAUSE AMPLE ACCESS EXISTS IN ROADDED AREAS**

Some roadless opponents argue that maintaining the status quo in currently roadless areas would be unfair to the disabled and the elderly. However, those who cannot, or choose not to, walk or ride a horse are accommodated by the current road system. There are 380,000 miles of roads in the National Forest system, more than 30,000 miles in Montana alone. I no longer have the energy and endurance to hike as I did for more than 50 years. However, I am not so self-indulgent that I now want roads built to wild places I can no longer reach. One doesn’t need to be physically present in wild country to appreciate its existence. I am most concerned about perpetuating wild country experiences for my five children and five grandchildren. I do not believe most people are absorbed with doing only those things that are simple and require no effort. Future generations deserve our prudent care of roadless areas. As Aldo Leopold wrote, more than half a century ago: “Recreational development is a job not of building roads into lovely country, but of building receptivity into the still unlovely human mind.” (Individual, West Glacier, MT - #A5946.70000)

ORV groups have argued that the roadless proposal discriminates against motorists and the handicapped. This hollow argument lacks substance. In reality, the number of handicapped people who desire access into remote roadless areas is extremely small. Of course, the handicapped, elderly, and motorists currently enjoy access to all of our national parks and the great majority of National Forest lands. It is not reasonable or prudent to believe that incapacitated or motor-bound persons should be allowed access to every last remote place in our country. We all have our limitations; many of us are not capable of mountain climbing, for example. No one is advocating the construction of a road to the summit of Everest just because some people are denied access. Those confined to vehicles enjoy excellent access to most of our natural wonders, it is not reasonable to expect that they will be able to travel to every last corner of our wild lands. (Individual, Durango, CO - #A5420.70700)

Political rhetoric of locking up the forest to motorized users has been used to slant the process away from protecting roadless areas. The reality is that there is an over-abundance of roads on public lands now. A recent study done for the southern Rockies Ecosystem project produced GIS mapping of roads within my region. The area reaches from southern Wyoming to northern New Mexico and is bounded on the east by the Great Plains and the west lies on eastern border of Utah. This included National Forest, BLM, and private land GIS map coverages in the database. One map that was generated from the data showed the distance one could get from the nearest road. In the analysis, 93.8% of the land base was within 1/2 miles of an existing road. How well does this fit with the average person's desire for the wild, rugged, wide-open spaces that bring them to the west and National Forests?

I have visited many designated wilderness areas over the years, and managed a few in my career. As a younger man, I was driven to visit these areas for the soul-nurturing solitude they provided. After several decades of familiarity, I now have come to realize just how small these areas are. Even in the larger wilderness areas designated in the original act of 1964, there are only small portions in each where one can be 5 miles or more from a road. The vast majority of land even in designated wilderness areas is within less than 3 miles from a road. In the entire southern Rockies only 1.2% of the land base is over 4 miles from a road. (Individual, Penrose, CO - #A21448.70320)

## **716. Public Concern: The Forest Service should protect roadless areas from timber removal.**

### **TO PRESERVE OPPORTUNITIES FOR THE DISABLED TO EXPERIENCE UNSPOILED NATURAL AREAS**

I want to express my opposition to any proposed changes to the Roadless Rule that would weaken the protection that your agency has already granted in the Tongass National Forest. ORCA (Outdoor Recreation and Community Access) uses and depends on the Tongass for almost all of our activities. Last year a group of Southeast Alaskans with severe physical, mental, and developmental disabilities kayaked from Hoonah to Tenakee. This was a life-changing experience for all involved. This year the area is facing the chopping block. Our program offers kayaking, hiking, fishing, and sailing all within the Tongass. Imagine the experience a few years from now when we take our clients to a barren wasteland and tell them about all the opportunities that used to exist in the Tongass. ORCA's continued use of these areas depends upon them remaining pristine and undeveloped. There are already 4,650 miles of roads and millions of acres of the Tongass that are developed. Leave the remaining Roadless Areas wild. (Organization, Juneau, AK - #A24938.70300)

## **717. Public Concern: The Forest Service should allow some exceptions to a national rule to facilitate access by the disabled.**

There should be trails within roadless areas that any disabled, handicapped, or elderly citizen will be able to access these areas with a motorized conveyance. These citizens deserve the right to utilize these lands. If they are not able-bodied enough to do so without the assistance of a conveyance, they should not be denied access, and an electric wheelchair is not a conveyance which can navigate any terrain, or snow. They should be allowed to utilize ATVs, snowmobiles, trail bikes, or automobiles whenever and wherever need be. (Organization, No Address - #A26800.70700)

Great question, been there too. Yes, very difficult to satisfy everyone, but my response is we have plenty of roaded national forest acres and areas. Every motorized aficionado has plenty of great places to go and see a motor under the hood or between their legs. Leave something behind as a legacy of what's left of the natural or nearly so landscape of our great continent for current and future generations to see. In fairness to those who are mobility impaired, I would like to see a flexible approach or policy that would allow on occasion, motorized transport of such individuals so they too can enjoy and see what an area undisturbed or largely undisturbed by development looks, feels, smells, and even tastes like if they so desire. (Individual, Olympia, WA - #A28646.70700)

**718. Public Concern: The Forest Service should exempt ski areas from a national rule.**

**TO ENSURE ENVIRONMENTAL JUSTICE TO LOW-INCOME FAMILIES**

Sipapu's ski school program teaches more than 1,300 students from 45 different schools each year in multi-week programs at very affordable rates. Sipapu's inability to provide these services in the future would be an "Environmental Injustice" for the low-income families in Northern New Mexico. (Permit Holder, Vadito, NM - #A20142.75310)

*Health and Wellness Values*

**719. Public Concern: The Forest Service should protect roadless areas.**

**FOR HUMAN HEALTH AND WELFARE**

I strongly believe in the preservation of wilderness as a key to the health and welfare of human beings. (Individual, Boulder, CO - #A212.70300)

I am a clinical psychologist and healthy lifestyle behaviors are a significant professional focus. Research, clinical practice and personal experience have combined to reinforce the value for health and psychological well-being of time spent exercising on a daily basis in natural settings. While we do not all have ready access to roadless areas, the more natural vegetation, free flowing waters and undisturbed landscape, the less noise, the cleaner the air and bluer the sky, the greater is the spiritual renewal derived from an excursion into the natural world. Peace of mind seems to be an increasingly expensive commodity in our society. Precious are the avenues to achieving it. (Individual, Needham, MA - #A15773.70320)

**FOR PHYSICAL AND EMOTIONAL REJUVENATION**

To me, roadless areas are places where humankind is a visitor and guest. Traces of man should be non-existent. The only signs that do exist are those of wild indigenous inhabitants. I rely on roadless areas to rejuvenate myself both physically and emotionally. (Individual, Aspen, CO - #A5116.70000)

Our population continues to demonstrate by its use patterns that people need quiet, wild places to visit to regenerate themselves physically, mentally and spiritually. We are on the right track toward accomplishing this most important goal. I implore you to keep us moving steadfastly in that direction. (Individual, Charlottesville, VA - #A4886.70300)

**FOR WOMEN'S SAFETY**

Roads in the Western forests bring pick-up trucks carrying men with guns, fugitives from the law, and teenagers looking for excitement or on a drunk. As a woman who enjoys being in nature as my primary leisure activity, I often avoid roaded areas in the National Forests not only because they are relatively unpleasant, [but] because I think they may be dangerous. Roadless areas, on the other hand, provide peace and tranquility and a sense of safety that I find nowhere else in our increasingly troubled society. (Individual, Victor, ID - #A20625.70320)

**FOR HUMAN SAFETY**

This road runs along a steep mountain slope where there is a government recognized and mapped geological fault where one part of the mountain is sliding over another and there is ongoing shifting masses of earth, but the U.S. government has also chosen to implement a timber sale that will dramatically increase dangers to human life. How can anyone justify voting for a rule that prioritizes timber sales over human life? (Individual, No Address - #A27962.70300)

**FOR WILDERNESS THERAPY OPPORTUNITIES FOR YOUNG PEOPLE**

We use the backcountry wilderness to help treat our students. If the areas we use were full of logging trucks and oil exploration equipment, our students would lose the effect of wilderness therapy. In fact while I was writing this letter, a student that had transitioned into our resident part of our program came to visit me. He had a difficult time last night and is returning to the wilderness for two days to try to clear his head. As you can see, the wilderness is an invaluable healing tool for our students. (Individual, Georgetown, CO - #A18074.70300)

Now I am “home” with my parents near Washington D.C. and I work with children and teenagers—I take them canoeing and rock climbing—I take them to where there are no roads, where many of them for the first time are in a setting where traffic is not a background noise, and I see what a transformative affect it has on these children, many of whom have difficulty in school, drugs, or with the law. I share these memories of mine with the idea of creating an impression of the value of wild places, and the importance of this land to the future generation. I am made to understand that you have the awesome role of determining the fate of America the Beautiful, of a say at least, in reserving the last remaining tracts in the condition the Creator said was good, and I ask that you do all you can for the future generations to ensure that is still good. (Individual, No Address - #A4605.70400)

**720. Public Concern: The Forest Service should not implement a national roadless rule.****THAT WOULD HAMPER SEARCH AND RESCUE EFFORTS**

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 - #A5415.90120)

**721. Public Concern: The Forest Service should protect roadless areas and discourage motorized recreation.****TO HELP COMBAT THE NATIONAL OBESITY EPIDEMIC**

One of America’s biggest national problems is obesity. Encouraging people to rely on motorized transportation for their ongoing activities contributes to this endemic health issue Americans manifest. We hike, fish, bird watch, camp, and enjoy our national forests tremendously. Hundreds of thousands of miles of roads exist in our forests now. Let’s do all we can to keep as many areas “roadless” as possible. We owe it to future generations. (Individual, Anderson, CA - #A7052.70400)

**722. Public Concern: The Forest Service should make special land use permits available to citizens disabled by Toxicant Induced Loss of Tolerance.**

Special permit land use should be made available to citizens disabled by Toxicant Induced Loss of Tolerance who can no longer tolerate even low levels of common chemicals. If America can provide sanctuaries for bears an other endangered species, we “ought” to provide sanctuary for fragile humans. (Individual, Marion, NC - #A4691.70700)

## Noise

### **723. Public Concern: The Forest Service should establish baseline sound levels and quantifiable noise standards for roadless areas.**

#### **TO REDUCE STRESS**

##### **PROTECTION OF "THE NATURAL QUIET" AND A "NATURAL NIGHT DARKNESS"**

To escape from the unwanted stress-producing sounds, noises, and (nighttime) lights of "urban life" and to experience the "natural quiet sounds" and a "naturally dark night sky" of the "great-out-of-doors" are issues, I feel, of great importance to many. Motorized vehicle noise and lights and air overflight noise are obnoxious to many, and efforts should be made (a) to document a baseline of the "natural (sounds and) quiet" in various parts of these areas, and (b) to establish quantifiable noise and audibility standards and criteria to help determine what types and levels of man-produced sounds, including military, commercial, or other air overflights, constitute an unacceptable "pollution" of the "natural sounds and natural quiet." (Individual, Bishop, CA - #A20954.70320)

### **724. Public Concern: The Forest Service should establish a reasonable decibel limit for exhaust systems.**

#### **TO DECREASE CONFLICTS BETWEEN MOTORIZED USERS AND OTHER RECREATIONISTS**

Conflicts with other recreationists were often associated with sound. During the 1970s, when the orders were developed, snowmobiles and motorcycles were much louder than today's machines. Concern with sound levels may have led to the creation of Executive Orders 11644 and 11989. Today's technology provides machines that are significantly quieter than in the 1970s. Furthermore, the technology exists to make motorized vehicles even quieter. Therefore, concern with sound can be mitigated by establishing a reasonable decibel limit for exhaust systems. States such as California and Oregon have enacted sound emission limits. Public land-use agencies could establish reasonable sound limits and use this approach to address the sound level issue. Why hasn't this been done? This solution is more equitable than closures. This issue must be addressed in the document and decision-making. (Organization, Helena, MT - #A13226.15168)

### **725. Public Concern: The Forest Service should not arbitrarily require roadless areas to have semi-primitive core areas in order to qualify as inventoried.**

#### **BECAUSE A COMPLETE ABSENCE OF SIGHTS AND SOUNDS FROM SURROUNDING AREAS IS NOT POSSIBLE, PARTICULARLY IN THE EAST**

Definition of "solitude" should not require cores of Recreation Opportunity Spectrum categories of Semi-primitive Non-Motorized or Semi-primitive Motorized lands as was done in the SAA roadless inventory. Nor should the agency's consideration of "whether and how to protect roadless characteristics" (dispersed recreation) be dependent upon the presence of these ROS categories (see DEIS A-13-14). Definition of ROS categories is oftentimes a cartographic and/or computer based exercise that may not reflect the reality of on-the-ground roadless recreational opportunities. Also, definition of "solitude" should not require absence of "sights and sounds" from surrounding areas throughout the roadless area, especially not east of the 100th meridian. Because of the on-the-ground reality of the terrain in Virginia and many other places (e.g., ridges and valleys with long sight lines) such an all-pervasive "absence" is simply not possible. Although the "zone of disturbance related to road noise [for wildlife] is estimated to be as great as one-half mile in forested areas" (DEIS 3-71), the writer of these comments can attest to being disturbed in Virginia NFs by intrusive motor noise originating from a much greater distance. This is just one more piece of evidence of the need for expanded roadless area protection. Demand for Semi-Primitive and Primitive "dispersed recreation opportunities is increasing . . . in an environment of diminishing supply." (DEIS 3-122). (Individual, Staunton, VA - #A29325.70320)

The FS defines recreational opportunities by the amount of roads an area has, or its distance from them. To be officially "Primitive" a tract of land must be at least 3 miles from an open road. Our forests are so heavily roaded that there is not a single Primitive recreational area available in any eastern National Forest. Sometimes we cannot escape from the sight or noise or smell of machines no matter how hard we try. Imagine how bad it must be if you are somebody (e.g. a bear) who actually has to live in these woods. (Individual, Staunton, VA - #A29325.70320)

## Adequacy of Analysis

### Summary

Some people question the sociological research and analysis that was conducted in preparing the Roadless Area Conservation Rule Draft EIS. These respondents state that residents in rural, forest-dependent communities were unfairly portrayed in a negative light, and ask that the Forest Service reject those studies and acknowledge positive attributes of these communities. Conversely, one respondent asserts that his personal experience as a law enforcement officer corroborates the view that commodity-dependent communities suffer negative social impacts, and urges the Forest Service to adopt a national rule.

#### **726. Public Concern: The Forest Service should reconsider sociology studies that portray rural residents in a negative light.**

Conservation groups and many rural sociologists, especially from University Sociology Departments, portray rural Americans in a very negative light. They conduct "studies" that show that rural areas are "economically depressed (or distressed)" because their incomes are not up to their standards. The truth is that rural residents trade the higher incomes they could make in the cities for the cultural and social values they enjoy living in rural areas, especially when they are raising their children. When this question comes up, please consider the fact that millions of Americans work for years in the cities so they can retire in the country. Rural "values" are not easy for many urbanites to understand, but they are very real and we adamantly defend those values and rural lifestyles.

Another social issue they "study" is education. They have successfully painted rural American school children as being under par with lower grade-point averages, or "below" the national standards. This is also a farce and is simply not true. Rural schools may not have the computer capabilities and other amenities of urban schools. But rural parents are more involved in their schools and their children's education and lives. Many children choose to follow the same occupations of their families, such as ranching, farming, logging, mining, recreation, and tourism. Some of those occupations do not require college degrees. But they do require the opportunity to pursue them. Rural areas provide those opportunities, and additional education can be obtained if necessary. When FS considers "values" those negative studies should not be used as a controlling factor in its decisions and should show more respect for rural American values, culture and society. (Organization, Three Rivers, CA - #A28739.70130)

#### **727. Public Concern: The Forest Service should consider that commercial resource users create negative social impacts in rural communities.**

I work as a law enforcement officer and am fortunate to serve a very peaceful community. I fear that by scaling back the roadless policy, industries like oil and gas and logging will begin to have a negative effect upon the peace of my community and many communities whose way of life depends on the wildlands near it. The type of people these industries attract are not the type of people I want in my community. From my experience, the employees of these industries are a black eye in the community. Alcohol abuse and a blatant disregard for law enforcement runs rampant among the employees of the extractive industries. I look at communities built around oil and gas, logging, and mining. They are marred with law enforcement challenges. Jackson Hole and many other communities along the Rocky Mountains do not need this headache and burden. (Individual, Jackson Hole, WY - #A30312.70000)

## Economic Environment and Values

This section includes six subsections: Economic Environment and Values General, Evaluation of Roadless Areas, Adequacy of Analysis, Economic Effects, User Fees, and Subsidies and Agency Expenditures.

### Economic Environment and Values General

#### Summary

A number of respondents discuss economic values at some point in their response to the Advance Notice of Proposed Rulemaking. Overall, the public asks that the Forest Service make sound economic decisions and only permit activities with positive economic benefits. Some respondents assert that commodity values are most important, while others suggest consideration of a broader array of economic values.

#### **728. Public Concern: The Forest Service should make sound economic decisions.**

Now is a difficult time. Our energy prices are at an extreme high, and our economy is slowing down. Let's not panic and make rash decisions. Let's make the right choices for the long haul. (Individual, Peterborough, NH - #A205.75000)

#### **BY ADOPTING THE ROADLESS AREA CONSERVATION RULE**

The Roadless Plan makes economic and fiscal sense. The Forest Service currently has an \$8.4 billion backlog of maintenance and construction on its existing 386,000 miles of roads in the national forests and grasslands. Many of these poorly maintained roads contribute to environmental threats to fish and wildlife by causing soil erosion in fish spawning areas and by damaging water quality. Building more roads into roadless areas while allowing the backlog of repair and construction on existing roads to go unaddressed is ludicrous. (Individual, Ethel, WA - #A11767.17240)

A reason to generally prohibit road construction in roadless areas is the cost of such construction. In Colorado, almost all easily accessible areas already have road access. Road construction into most of the remaining unroaded areas would be costly, difficult, and highly impacting to the environment. The value of any resources extracted from these areas, would probably not equal the cost of accessing and developing them, let alone justify the despoiling of the environment. (Organization, Denver, CO - #A12008.17100)

#### **729. Public Concern: The Forest Service should promote only economically viable activities within national forests.**

The only activities that should be promoted within National Forests are those which are economically viable. The Forest Service should also take into consideration issues such as watershed protection, endangered species habitat and other irreplaceable attributes when determining the most viable long-term uses of public land. (Individual, Skokie, IL - #A529.75100)

## Economic Evaluation of Roadless Areas

### Summary

**General Comments** – Members of the public suggest a wide variety of evaluation criteria which, they assert, the Forest Service should use when conducting roadless area evaluations. Suggestions range from considering purely economic values—especially of commodity resources—to a combination or ordered hierarchy of economic, social, and environmental values. Some state that the Forest Service has already adequately evaluated the economic contributions of roadless areas, and has determined that timber resource values are insignificant in comparison with other benefits; thus no further analysis is necessary. Likewise, some alleges that the Agency continues to over-emphasize market values, and should more effectively balance these against non-market and social values. Finally, some respondents state that it is not appropriate to consider economic values at all when conducting roadless area evaluations.

**Comparative Costs and Benefits of Ecosystem Protection and Resource Extraction** – A number of people frame their comments as a comparison between competing forest management activities and human activities. As such, respondents compare activities which, they believe, are mutually exclusive and request the Forest Service to favor one over the other based on economic reasons. There are those who suggest that recreational activities should be favored over commodity management due to economic advantages. Others assert that the Agency should emphasize profitable and moneymaking activities over those that do not pay, favoring commodity use over recreation or preservation. A number of respondents ask that the Forest Service better account for long-term rather than short-term benefits when evaluating roadless areas.

### **730. Public Concern: The Forest Service should consider only economic values.**

The Forest Service should take only economic values into consideration. (Individual, Port Townsend, WA - #A964.17000)

The Forest Service has more than adequate information on the value and considerations to be taken due to past planning efforts, EIS and environmental impact studies. We do not believe that efforts should be made to expand these. In fact, they should be identified in the forest planning process only to the extent of economic impact. (Organization, No Address - #A30026.45100)

### **731. Public Concern: The Forest Service should not base the value of the land on the value of the resources that can be removed.**

The values of roadless areas are innumerable, but basing the value of these lands on the value of the resources that can be extracted from them is ludicrous. (Individual, Portland, OR - #A13949.45100)

#### **DO NOT CONSIDER THE HISTORIC ECONOMIC COMMODITY VALUES OF THE LAST FIFTY YEARS**

The USFS should focus on alternative values, not the historic economic extraction values of the last 50 years that have not put the USFS in the place it is today! The USFS manages roadless areas that are of international value for scenery, wildlife, air quality, and backcountry experience. The USFS needs to get into the 21st century and consider values other than resource extraction as priorities. Demographic issues in respect to socio-economic outcomes of roadless enactment is a marginal issue on the national level. (Individual, No Address - #A15444.45100)

**732. Public Concern: The Forest Service should describe values in terms of cost/benefits or some other economically definable method.**

**BECAUSE VALUES ARE MEANINGLESS WITHOUT AN ECONOMIC ANALYSIS THAT CAN BE PEER REVIEWED**

“Values” must represent the potential to affect the local economy—positively or negatively.

“Values” need to be described in terms of cost/benefits or other economically definable method. Subjective evaluations are basically a report writer’s opinion. This is political management. Without an economic analysis that can be peer-reviewed values are meaningless when we are discussing public land policy. (Individual, Libby, MT - #A10531.45000)

**733. Public Concern: The Forest Service should consider relevant economic factors in second-stage roadless area evaluations.**

Relevant economic considerations for the second-stage roadless area evaluations [following evaluation for wilderness designation] include, but are not limited to: mineral values accessible without use of roads; current and future hunting and fishing use expressed as wildlife and fish user days (WFUDs); recreation use of the area expressed as recreation visitor days (RVDs); grazing uses; and water uses. (Civic Group, Roanoke, VA - #A1713.75000)

**734. Public Concern: The public should evaluate roadless areas, first according to economic considerations and second by social considerations.**

What are the characteristics, environmental values, social and economic considerations, and other factors the forest Service should consider as it evaluates roadless areas? The FS shouldn’t do the evaluating, the public should, and the public should be governed first by the economic considerations: Are there minerals there we could extract? How much merchantable timber is there, and what’s the best way to get it out? Would it be suitable for grazing? Could the ground be used for other purposes such as a ski area, a golf course, etc. Second, by social considerations: How will this affect my community? My state? (Individual, Philomath, OR - #A943.75000)

**735. Public Concern: The Forest Service should give equal weight to the economic value of roadless areas as intact ecosystems as to other economic values.**

We need to stop thinking in terms of all public lands having nothing more than dollar values (i.e., needing to be “harvested,” “utilized,” “healthy,” and other code-words meaning “exploited for profits”). Public lands left in their natural, wild state have tremendous values in themselves. Recreation in these areas, for example, actually has much higher dollar values in economic terms than logging, mining, and drilling, if that is how we must evaluate their worth. (Individual, Cumming, GA - #A21156.75000)

The economic value of the roadless ecosystem itself should receive as equal weight as other economic factors, such as use by local communities. The value of roadless areas in terms of services and economics is not easily traced through classically defined financial markets. The benefits of clean air, clean water, soil, climate, recreational lands, healthy forests should all be considered in their economic terms. This can be accomplished and estimates exist (Sullivan J and Krieger G Environment and Health: Going into the Twenty-First Century, Chapter 1 in Clinical Environmental Health and Toxic Exposures, Lippincott Williams and Wilkins, Philadelphia, 2001). The Forest Service should not use traditional economic benefit alone (logging, mining, recreation) any more than it weighs the economic benefit of a roadless area in and of itself for its overall ecosystem services. I would subjugate local economic values to the overall economic value of an intact ecosystem or roadless area. (Individual, Tucson, AZ - #A872.75000)

I urge you to read the enclosed article *Economic Laws Clash With the Planet's* and accept these comments also as if they were my own in response to the Roadless Area Conservation Advance notice of proposed rulemaking.

“The first commandment of economics is: Grow. Grow forever. Companies must get bigger. National economies need to swell by a certain percent each year. People should want more, make more, earn more, spend more - ever more.

The first commandment of the Earth is: enough. Just so much and no more. Just so much soil. Just so much sunshine. Everything born of the Earth grows to its appropriate size and then stops. Its creatures learn, mature, diversify, evolve, create amazing beauty and novelty and complexity, but live within absolute limits.

Now, when there's an inconsistency between human economies and the laws of planet Earth, which do you think is going to win? . . .

Economics say: Use it up fast. Don't bother with repair; the sooner something wears out, the sooner you'll buy another. That makes the gross national product go round. Throw things out when you get tired of them. Throw them to a place where they become useless. Grab materials and energy to make more. Shave the forests every 30 years. Get the oil out of the ground and burn it now. Make jobs so people can earn money, so they can buy more stuff and throw it out.

The Earth says: What's the hurry? Take your time building soils, forests, coral reefs, mountains. Take centuries or millennia. When any part wears out, don't discard it, turn it onto food for something else. If it takes hundreds of years to grow a forest, millions of years to compress oil, maybe that's the rate at which they ought to be used.

Economics discounts the future. Ten years from now, \$2 will be worth \$1. You could invest that dollar at 7 percent and double it in ten years. So a resource 10 years from now is worth only half what it's worth now. Take it now. Turn it into dollars.

The Earth says: nonsense. Those invested dollars grow in value only if something worth buying grows, too. The Earth and its treasures will not double in 10 years. What will you spend your doubled dollars on if there is less oil, soil, dirtier water, fewer creatures, less beauty? The Earth's rule is: Give it to the future. Lay up a fraction of an inch of topsoil each year. Give your all to nurture the young. Never take more in your generation than you give back to the next.

The economic rule is: Do whatever makes sense in monetary terms.

The Earth says money measures nothing more than the relative power of some humans over other humans, and that power is puny, compared with the power of the climate, the oceans, the uncounted multitudes of one-celled organisms that created the atmosphere that recycle the waste, that have lasted for 3 billion years. The fact that the economy, which has lasted maybe 200 years, puts zero value on these things means only that the economy knows nothing about value - or about lasting. . . .

We don't get to choose which laws, those of the economy or those of the Earth, will ultimately prevail. We can choose which ones we will personally live under - and whether to make our economic laws consistent with planetary ones, or to find out what happens if we don't. (Individual, Mena, AR - #A11984.70500)

### **736. Public Concern: The Forest Service should recognize that roadless areas do not contain economically viable timber resources.**

By and large, National Forests were created from the dregs of the forested lands in the public domain. And the remaining roadless land is the worst of the dregs. If they were primarily valuable for timber, minerals and grazing they would already have been developed. It appears to me the highest and best use is to leave the land undeveloped. Leave them just as they are today! (Individual, Hamilton, MT - #A5811.10111)

It is my personal opinion that the roadless initiative as already developed has received about as many million comments as could possibly be desired. What is incomprehensible is that the overwhelming majority in favor of this proposal—including most of us who live in Montana—are not considered an acceptable measure of what has to be a clear mandate. Despite all the ridiculous rhetoric, the acres

involved are not, will not, and cannot be converted to productive timberlands. Their absolute best value is non-motorized recreation and wildlife. (Individual, Missoula, MT - #A4209.10153)

The argument that roadless areas are a lucrative source of commercial value is groundless. Those areas provide less than 0.2% of our timber supply, and large taxpayer subsidies would be required for commercial logging in roadless areas. The real economic value of national forests comes from recreation and environmental quality of life, which the Roadless Areas Conservation Rule carefully preserves. (Individual, Ft. Meade, MD - #A4749.75500)

The national forest roadless areas were left roadless between 1950 and 1990 because the value of the timber in these areas was so low it could not be sold despite road-building and fire protection subsidies. In the 1950's and '60's Forest Service foresters created timber sales which included valuable low elevation timber at the mouths of valleys and worthless high elevation timber on the ridges. Loggers complained that to get the valuable timber they also had to buy the worthless logs. The idea was what if a logger bought such a timber sale, he would have to build roads (in the end subsidized by the government) to the ridges, so that the poor timber site could be "brought under management." Several million such acres are now "under management". But there is no money to manage these poor sites. The Siuslaw National Forest had to abandon hundreds of miles of decaying roads because they degraded water quality. There is no money to maintain these roads and there is no money to pre-commercially thin the poor quality stands the roads were built to access. The Mt. Hood N.F. had to abandon over a hundred miles of road of road in Fish Creek because it could not justify the expense of rebuilding them after repeated landslides: the timber was not valuable enough to justify repeated road rebuilding them floods in 1964, 1972 and 1993. This is a problem in national forests all over the Pacific Northwest. The 58 million roadless acres on the national forests for a reason: it has never been, nor will it ever be, economically feasible to manage them for timber. (Individual, Portland, OR - #A6269.75600)

**737. Public Concern: The Forest Service should recognize that it has already demonstrated that the commodity values of roadless areas are insignificant as compared to recreation and non-commodity values.**

In developing the Rule, the USFS also showed that the commodity values of roadless areas are not significant, and that their real economic values come from recreation and quality-of-life enhancement. (Individual, Oak Ridge, TN - #A12830.75440)

The Forest Service's own figures, supported by independent studies, clearly demonstrate that recreation and tourism contribute far more to the GDP nationally than logging, mining, and other extractive and destructive industries in our National Forests. Nationally, recreation and tourism in the National Forests provide thirty times more revenue than logging and thirty-eight times more jobs. (Organization, Bland, VA - #A17007.75440)

In addition to the substantial public responses to the Roadless Initiative, this theme has emerged from other inquiries by the Forest Service: "Most studies indicate that the majority of the American public places a higher priority on non-commodity uses than on commodity uses of public lands." Pg. 3-17, Roadless Area Conservation FEIS. (Individual, Sedona, AZ - #A17217.70500)

**738. Public Concern: The Forest Service should not consider economic factors when evaluating roadless areas.**

Economic considerations should be omitted from consideration in the roadless areas, especially since the Forest Service has identified they will lose money on roadbuilding activities in these areas. Less than 1% of the nation's wood supply would be provided by logging in these areas, and they are in hard-to-reach areas or they would have been logged already. (Individual, Olympia, WA - #A4929.75000)

All of this is so tiresome. If most Americans want to preserve our forests, why does the minority win? It's incredibly demoralizing to live in a country where the only thing that matters (that talks) is cold, hard cash. (Individual, Brooklyn, NY - #A1397.75000)

I am a Republican and believe in the merits of capitalism; but I also believe that we need to exercise some restraint. Capitalism should not be the driving force behind our decision-making. I believe that most Americans would agree that we need to reduce our dependence on foreign oil, but raping what little is left of our national forests is not the answer. We will simply be trading one crisis for another. (Individual, Peterborough, NH - #A205.75100)

What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates inventoried roadless areas? Two words: Intact ecosystems. Economics have been considered on the other 98% of the USA. You don't need to consider it here. In reality, protecting roadless areas is a good economic move, you just need to think long term. (Individual, Hampton, VA - #A16453.75900)

## ***Comparative Costs and Benefits of Ecosystem Protection and Resource Extraction***

### **739. Public Concern: The Forest Service should consider long-term costs/benefits a higher priority than short-term costs/benefits.**

The true economic cost of natural resources must take into account the degradation of the land and wildlife (which includes our stand of living). Extinction costs more than just us, it costs for all generations. Long-term cost/benefit must be made a higher priority than short-term costs/benefits. (Individual, Bozeman, MT - #A961.75900)

I am a recreational user of National Parks and wilderness lands, and I am always appreciative of the efforts of Federal agencies to make otherwise-inaccessible areas available so that I may enjoy the natural beauties of our beautiful continent. But I am also deeply appreciative of the fact that roadless areas comprise a critical part of our national assets—and that must not be compromised for short-term economic gain! Not for the pleasure of tourists like myself, nor for the profit of resource development companies. (Individual, Chestertown, MD - #A462.75000)

The Forest Service should NOT use as criteria the short-term economic gain of timber and mining interests; only LONG-term economic factors (including the future sustained yields and compatibility with surrounding areas) should even be considered. (Individual, Bozeman, MT - #A285.65000)

When considering a commercial use, Forest Service managers should carefully weigh the environmental impact (via objective, science based studies), the impact on all forms of recreational use, the availability of the natural resource targeted by the commercial use in privately owned areas, the cost incurred by the forest service to support and manage the use, the return value gained by the Forest Service as a result of the use, and the value returned to the public at large. (Individual, Saint Louis, MO - #A629.65000)

### **740. Public Concern: The Forest Service should not place economic interests above other interests.**

Ensure that economic interests are not placed above other interests in public ownership of forest land, including recreation, wildlife habitat, carbon sequestration, watershed hydrologic processes. (Individual, Lacey, WA - #A530.75000)

*Competing personal values* should have very little to do with your decision, especially when some of those values are ill-informed, as it often the case in our part of the country. Limited resources must be managed not for the satisfaction of a misguided sense of personal freedom, local autonomy, recreational preferences or “economic necessity” but for the health of the land and its complex community of life. It is time for harvestable trees and extractable hydrocarbon to take a back seat in management considerations for our precious remaining roadless areas. (Organization, Vernal, UT - #A20753.70000)

As global population grows, it will be ever more important to maintain wild untrammled places known to man and beast in their beginnings. There is a line in the sand. On one side is humankind and beast together, circumstantially foe of friend. On the other side is a world of humanity’s making, of machines and technological wonder. It is a fine line. As Hope Ryden says in *God’s Dog*, “Nature, too, must be served if she is to renew the bounty upon which all her life forms depend and to which each must also contribute. For ultimately, the green leaf has a more legitimate purpose than any technology, and each creature, linked in a chain that is also man’s lifeline, has more purpose than economic growth. (Organization, Bismarck, ND - #A19108.75530)

#### **BY MANAGING FOR THE PROTECTION OF FORESTS RATHER THAN FOR PROFIT**

The role of the Forest Service is to protect the forest, not the potential profits that could be made from any resources contained therein. (Individual, Bozeman, MT - #A284.15100)

There are those of us who do not have a private ranch with rolling hills, unspoiled forest ranges or endless prairies. We must be content to visit such places or view them from afar to remind ourselves of what our America once was and to bask in the wonder of nature. Sadly, we must . . . be content to believe that our elected officials aren’t just businessmen looking to exploit whatever is available in nature in a quest for the almighty dollar. Please be aware enough to realize that keeping whatever unspoiled areas still remain off-limits will not sink the United States economy. (Individual, Hammond, IN - #A4373.15000)

The arguments which favor continued development and exploitation of our irreplaceable public lands are fallacious and designed primarily to provide economic advancement for a few special interests, to the detriment of the populace as a whole. The American people have grown tired of seeing their prized public lands—which belong to ALL of us—exploited and destroyed for the sake of quick economic gain for a few greedy, short-sighted, sociopathic special interests. We want it stopped. Now. (Individual, Visalia, CA - #A275.15120)

It is past time for the current Executive Branch to provide leadership for us, not the few rich, special interests who would benefit from more harmful extraction from the National Forests, probably in a taxpayer subsidized way that has been so typical of many Forest Service timber sales. Be true to Teddy Roosevelt, a true conservative Republican. (Individual, Salem, WV - #A351.15120)

#### **741. Public Concern: The Forest Service should allow profitable natural resource management in roadless areas.**

What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates IRAs? The Forest Service should look into what makes money, like drilling for oil, logging or whatever would make that land actually profitable. (Individual, Silver Springs, MD - #A4593.75500)

Opponents and advocates of timber harvest need to take off their blinders to see that neither the left nor the right are the only answers, that there is a broad middle ground where logging of our National Forests can be accomplished in a manner that will result in economic benefit for those performing the harvest and a healthy forest for the flora and fauna for generations to come. (Individual, Troy, MT - #A664.75100)

**IN SUCH A WAY AS TO OFFSET ENVIRONMENTAL IMPACTS**

The Forest Service should base their decisions on the economic base of the natural resources first with management to off set environmental impacts but with the intent to allow the development of our resources. Any economy is based on the development of natural resources such as mining, timber, and agriculture. We have the strongest economy in the world and two drivers of this economy are free enterprise and the development of natural resources. Sometimes we view our present time as not needing the resources that past generations have but some things do not change. Without these bases then the economy suffers. If the Forest Service can replace this need then great “roadless” management is simple. Replacement does not count for Americans to have to leave this country to seek employment. (Individual, Elko, NV - #A4853.75000)

**742. Public Concern: The Forest Service should ensure that moneymaking projects on National Forest System lands are a by-product of managing for long-term forest sustainability and biodiversity.**

Timber harvest projects on our National Forests can help local community stability and economics. As I said before, that’s why I think the Administration wants more local control. Such moneymaking projects must be a by-product of managing for long-term forest sustainability and biodiversity. Impactive, moneymaking, timber harvest or mining projects must never be an objective unto themselves. The National Forests are in no way responsible for maintaining the economic health of local community, nor are they responsible for providing local employment opportunities. This must be made quite clear within the USFS and the communities adjacent to and inside the forests. (Individual, Grangeville, ID - #A830.75300)

**743. Public Concern: The Forest Service should manage roadless areas for long-term local economic stability rather than short term benefits.**

Washington state, as well as much of the rest of the western USA, is littered with the ruins of towns abandoned when the mines shut down or the forests were all cut down leaving nothing but a great mess and an economic desert. National Forests in general, and roadless areas in particular, should not be managed merely to create a short-term economic bonanza and long-term devastation. Many of those ruined towns would now be flourishing, prospering on the economics of recreation and of providing a desirable residence to a population increasingly untied from a particular place, had they been willing to view their resources on a long-term basis. (Individual, Seattle, WA - #A17261.70100)

Rural development should not depend solely on one industry, especially if it is not sustainable. Rural Western economies have seen such a decline because timber industries pulled out when they knew that the old growth was gone. What is going to happen after they log the remaining roadless areas? The boom and bust cycle of extractive industries has been the bane of the western economy. Local communities that are told that opening roadless areas will provide them with jobs and growth should be reminded that logging old growth or mining gold, or drilling oil never lasts forever. (Individual, Amasa, MI - #A793.75100)

A word on the false “jobs vs. the environment” dichotomy that is so often used to frame this debate: though it is true that the implementation of the full RACR passed under President Clinton would result in some disruption in one sector of the U.S. job market, the cost is well worth the benefit, especially when one considers that such a move would spur changes in forest-dependent rural economies which they would benefit from in the long run. Many Americans rely on the unstable, boom and bust timber industry for seasonal income, but forest economies which focus commerce around preserved forests provide over 30 times the jobs and income as extractive forest economies do. And, significantly jobs dependent on standing forests are stable if the forest is left standing. It only takes one cut to eliminate all those jobs overnight. (Individual, Knoxville, TN - #A8753.75310)

**INCLUDE THE TONGASS NATIONAL FOREST**

Public land should not be managed in the short-term, short-sighted interest of a handful of local interests, but in the long-term interest of the country as a whole. Specifically, no exception should be made in the rules under suspension for the Tongass rainforest area in southeast Alaska. (Individual, Seattle, WA - #A17261.70100)

**744. Public Concern: The Forest Service should consider that tourism and recreation produce more revenue than commodity use.**

I believe that the roadless areas of our National Forests deserve the strongest possible protections. This isn't just a good idea, it also make good economic sense, because timber and mining provide a small and diminishing monetary input to our local communities, while tourism and recreation provide a large and rapidly increasing element in our economy. In short, it's far more valuable for us if the trees are left standing on the mountainsides than if they are cut and used for timber. There are many other important reasons to leave our roadless areas unroaded and uncut, including protection of game, fish, and plants that many of us depend on for food. We also depend on the commercial salmon fishing industry in the Tongass, and salmon are a forest species whose spawning streams can be seriously damaged by logging. Our very large population of brown bears has become economically valuable as a major tourist attraction, and biological research is showing that our bears make very little use of fresh clearcuts, virtually no use at all of second growth forest. (Individual, Sitka, AK - #A698.75500)

Although timber production has become a dominant use of our National Forests, this was not their original intent, and the American people have made very clear their opinion that it should not be their intent today. Only 5 percent of America's timber comes from the National Forests, and less than 5 percent of that comes from areas protected by the original roadless policy. By far the most important economic value of the Tongass and other National Forests) today (85% of total revenue) is from tourism, recreation, and other uses such as hunting and fishing, and this is more than five times the revenue from logging. The roadless policy is very important for protecting the most economically valuable uses of our National Forests, while industrial activities such as logging and mining devalue and detract from all other uses. (Individual, Sitka, AK - #A698.75500)

The largest economic value of national forests is its contribution to recreational capacity and regional quality of life, which the Roadless Area Conservation Rule would enshrine for all time. Approximately 85 percent of the revenue generated from America's national forests comes from recreational activities, dwarfing the revenue yielded from logging. (Individual, Logan, UT - #A939.75000)

We operate a tour business in Southwest Alaska (have for 20 years) aboard three small passenger vessels. Recently, we committed almost \$2 million of corporate money to move our maintenance and operations departments to Sitka (building a warehouse and docking facilities at the old pulp mill site). In the process, we expect to triple the number of Alaskans we employ. As tourism has grown and timber harvesting continued in The Tongass, we have noted increasing competition for . . . a decreasing number of untouched areas. Accordingly, we disagree with this Administration's policy of revising the Roadless Area Conservation Rule as published by the previous Administration this past January. (Business, Washington, DC - #A3620.75540)

The two dozen diverse communities within the Alaska rainforest range from Juneau, the state's capital with 29,000 resident, 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. The commercial fishing and seafood processing industry accounts for approximately 20 percent of southeast Alaska's private industry employment. Commercial fishing provides large incomes, over a short summer season, to a broad spectrum of Southeast Alaskans. This income provides the critical source of capital to most rural communities, where year-round employment is scarce. The industry is dominated by salmon harvesting, which depends on high-quality stream habitat in the rainforest. (Organization, Nevada City, CA - #A4941.75100)

While the Forest Service has plenty of money budgeted for its money-losing timber program, they are underfunded when it comes to managing the forests for a growing tourism industry. Visitor impacts are increasing and the USFS is way behind the curve on assessment and planning for the number of people who are currently using the Tongass. In 2001, Southeast Alaska is expected to host over 680,000 cruise ship tourists. Local tourism businesses and visitors of all types rely on intact watersheds for recreation opportunities. When will the Forest Service in Alaska begin to manage the forests for tourism rather than logging? (Organization, Sitka, AK - #A12003.17100)

**745. Public Concern: The Forest Service should consider that local communities would benefit more from investing in new technologies than from relying on forest commodity jobs.**

Without question, the Roadless Areas could provide jobs and income for local economies, but better jobs and greater economy can come from investing in new technologies and new materials. I am absolutely convinced the reasons for considering changing the Roadless Area Conservation Rule do not outweigh those against. (Individual, Durham, NC - #A770.75100)

## Adequacy of Analysis

### Summary

**General Comments** – Both those who ask that the Roadless Area Conservation Rule not be implemented and those who ask that it be implemented question the adequacy of the economic analysis that was conducted during the rulemaking process. Some respondents assert that negative economic consequences were underestimated, while others state that net benefits were underestimated. Some people conclude that the Forest Service still fails to fairly consider or quantify non-market values and ecosystem health benefits, dismissing them as qualitative and therefore failing to incorporate them into the net public benefit valuation as required by statute. Some state that economists have now developed tools to quantify these values, which the Forest Service should adopt. Suggested benefits to be quantified include economic valuation of healthy ecosystems, including water purification, and intrinsic values.

**Economic Effects** – Some individuals specifically ask the Forest Service to quantify the effects of the Roadless Area Conservation Rule on the recreation sector. Both those who ask that the Rule be implemented and those who ask that it not be implemented state that such an analysis will vindicate their position. One organization asserts that the economic analysis failed to analyze or consider negative effects on agency employment that may result from adoption of the Rule, and requests that this analysis be completed. (See also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Regulatory Flexibility Act*.)

**The Roadless Area Conservation Rule EIS** – Several respondents specifically discuss elements of the economic analysis in the Roadless Area Conservation Rule EIS. Some request that the

Forest Service should better explain its methodology and data used in its preparation. One respondent questions the analysis of effects to the timber industry, asserting that it overstates economic effects to the timber industry by failing to account for the distorting effects of annual subsidies to this industry and by excluding any adjustments to timber receipts to account for payments to states. This individual requests that these deficiencies be corrected.

### *Adequacy of Analysis General*

#### **746. Public Concern: The Forest Service should produce competent, unbiased economic analyses.**

For years, these figures have been thrown out and never seriously refuted: 4 billion dollars from timber production from Forest Service lands; 10 times as much return to local communities from their recreation, tourism, etc. If anywhere near true, the USFS must have competent, unbiased economic analysis and utilize that as the primary guide in balancing competitive interests in the Forest Service land use. (Individual, Kalispell, MT - #A27715.15160)

#### **747. Public Concern: The Forest Service should refocus its cost benefit analysis on economic consequences when evaluating a national roadless rule.**

Economic consequences should be considered when evaluating inventoried roadless areas. Many individuals and governments have made considerable investments to better serve those individuals interested in visiting forest areas. The reasons for those investments must be considered before changes are made that could devastate family and small town/rural economies. Realistic economic data is available through local Chambers of Commerce or CVBs and through many EDCs and Economic Planning Units. (Business, Haslett, MI - #A4861.75000)

In order to achieve multiple-use, the agency must retain a reasonable balance of uses on the NFS. Therefore, we strongly oppose the FS intent to assign its first management priority as ecological sustainability. The FS has an obligation to the public to adopt management policies that take into account the social and economic needs of the nation through an unbiased approach to land and resource management planning. The FS's final rule places an inordinate focus on aesthetic and ecological values while discounting the needs of the communities who survive in the western states in part due to activities on the NFS. We urge the agency to revise its rule to one that meets the precise intent of the law. (Business, Denver, CO, - #A25688.75900)

#### **748. Public Concern: The Forest Service should conduct adequate cost benefit analyses before issuing a new rule.**

The cost-benefit analysis accompanying the prior administration's proposed rule was inadequate and incomplete. The best tool the Forest Service has to balance competing values and limited resources is through solid cost-benefit analysis. Our July 2000 comments provide examples of how the previous cost-benefit analysis was short on information necessary to support the policy of the prior proposal. (Business, Washington, DC - #A3690.75900)

We believe that a complete economic assessment be done regarding the non-consumptive uses on these lands. This should include the values for fishing, hunting, bird watching, and all recreational uses. This should be done in comparison to the value that is usually given for an area that is basically taken from the commodity extractions presented. (Business, Coarsegold, CA - #A1589.75900)

The FEIS chooses assumptions that purposely minimize the net economic impact calculated for the proposal, and yet fails to demonstrate that the proposed alternative(s) is warranted on environmental or economic grounds. (Professional Society, Anchorage, AK - #A21707.75200)

### **BY ANALYZING THE COSTS AND RISKS ASSOCIATED WITH DEVELOPED ACTIVITIES IN ROADLESS AREAS**

Please analyze the ecological benefits of conservation of roadless areas. Also, analyze the costs and risks of alternatives that allow the roading of these areas and the costs and risks that prohibit roading but permit degrading activities such as logging, mining and vehicular use. This analysis of the costs and risks associated with roading, logging and otherwise will suffer and which will risk extinction. An analysis of the resultant ESA listing and their associated costs should also be discussed and quantified. (Organization, Cave Junction, OR - #A17235.14500)

### **BY CONSIDERING ECONOMIC ECOSYSTEM VALUES OF NATURAL RESOURCES**

Also, remember that the economic non-use values of natural resources are consistently under estimated in cost benefit analyses preformed by the EPA and other government groups. (Individual, Ridway, PA - #A3822.70500)

### **BY ACCOUNTING FOR RESOURCE DAMAGE FROM COMMODITY USES**

Do more cost-benefit analysis—one that takes into account the social, environmental and economic costs (including the costs to the USFS for “cleaning up” after cattle and logging activities). (Individual, No Address - #A410.75900)

### **BY CONSIDERING THE COMMERCIAL INTERESTS OF LOCAL AREAS**

The Forest Service asks what are the characteristics, environmental values, and social and economic considerations that should be considered in determining what activities should be allowed or prohibited in roadless areas. [Footnote 6: 66 FR 35920 (July 10, 2001).] The main consideration is not to exclude any value that is important to the locality. We are pleased to see in this advance notice that the Forest Service has raised the possibilities of economic interests in roadless lands. The previous proposal did not provide for an assessment of commercial interests in an affected forest area. Without an understanding of all interests, including commercial considerations, the Forest Service is not in a position to fully appreciate the cost-benefits of its management decisions. (Business, Washington, DC - #A3690.75500)

### **BY ANALYZING LIKELY TRENDS IN THE FUTURE VALUES OF RECREATIONAL AMENITIES AND NATURAL RESOURCE COMMODITIES, AND LOST OPTION VALUE INHERENT IN FURTHER DEVELOPMENT**

Obviously the Forest Service needs to think carefully through a number of implementation issues as outlined in the ten questions, reasonable application of some variant of cost-benefit analysis seems warranted. The central point, however, is that this cost-benefit analysis must take into account both likely trends in the future values of recreational amenities and natural resource commodities, and also the lost option value inherent in any further development of currently roadless areas. (Individual, Boston, MA - #A30308.11100)

## **749. Public Concern: The Forest Service should consider both market and non-market values in its economic analysis.**

Market and non-market economics must be taken into consideration to provide a realistic and accurate analysis of the benefits and costs associated with our public lands. Non-market economics are difficult, to some extent, to incorporate into analyses because they are frequently economic factors that cannot have a real dollar figure attributed to them. However, non-market economics, using the most sophisticated analysis possible, is absolutely crucial and perhaps the most important element to making policy decisions (Morton, 1999). Unfortunately, land management agencies such as the Forest Service have historically ignored the non-market values of public lands, and have instead assessed only the commercial value of forest commodities like timber. (Although the Service does a very poor job of utilizing non-market analysis, the agency is required by law to take forest values beyond commodity production into consideration when doing economic analysis of management under the Multiple Use Sustained Yield Act (MUSYA, Public Law No. 86-517 Stat. 215)). (Organization, Nevada City, CA - #A4941.75800)

The characteristics, environmental values, social and economic considerations, and other factors should include both market and non-market economic to provide a realistic analysis of the cost and benefits the Forest Service as it evaluates IRAs. The Piasa Palisades are dismayed that the Forest Service has

historically ignored any non-market values of public lands, insisting on assessing the commercial value of forest commodities like timber. Roadless areas provide less than two-tenths of one percent of the nation's timber supply, any commercial logging of these areas would require large taxpayer subsidies.

We realize that non-market values are difficult to incorporate because they may not have a positive dollar amount attributed to them, but we also realize the time has come to balance the multi use land with multi use values. Further still, we ask the Forest Service to solely use sophisticated non-market economic analysis, omitting the market economics. (Organization, Alton, IL - #A13847.75800)

**750. Public Concern: The Forest Service should base its economic analysis on real data rather than inaccurate models.**

There must be a comprehensive evaluation of the social and economic impact of each alternative on surrounding communities. This should be based on real data, not models bearing little resemblance to the real communities. (Individual, Cloquet, MN - #A8272.75300)

**751. Public Concern: The Forest Service should improve socioeconomic input/output modeling in updated or amended forest plans.**

**IN COLLABORATION WITH OTHER AGENCIES**

To better understand the nature and magnitude of potential socioeconomic impacts that may be caused by the roadless rule and other related actions, we recommend related Forest plan updates or amendments include socioeconomic input/output modeling. To improve the quality of such modeling, save money, and take a major step towards more collaboration, such modeling should involve other organizations, including federal, state, and local agencies. For example, we are working with the BLM in Nevada to form a collaborative socioeconomic working group. This group will include a wide range of agencies and organizations that have an interest in the socioeconomic assessment of the management alternatives being assessed in a new resource management plan for a National Conservation Area and associated wilderness areas. The working group will help the BLM conduct the socioeconomic modeling and compile the related database, including fiscal conditions in local counties. There is a significant opportunity to coordinate the modeling approach and databases compiled for this project, and previous projects in other parts of the state, with the upcoming update of the Humboldt-Tonya Forest Plan. (State Agency, Carson City, NV - #A17669.12310)

**752. Public Concern: The Forest Service should provide information regarding maintenance costs of roaded and unroaded areas.**

Other concerns related to this issue are the lack of information regarding the costs of maintaining areas which do have roads and the costs of maintaining areas which do not have roads. (Individual, No Address - #A448.17230)

**753. Public Concern: The Forest Service should adopt a quantitative valuation formula for spiritual value in evaluating roadless areas.**

In a broad sense stewardship, economics, and ecology are and should be interrelated. The three purported to all be interested in making sure that God's household (the world) runs well for the common good of all, that is the whole of God's good (efficient!) creation. In the section "National Forest Timber Sales—Facts and Analysis," I suggest that the value of the religions or spiritual "*Oikos*" (SpV) in economic terms could be equated to the sum of the Bequest Value (BV) plus the Existence Value (EV) plus the Nonhuman Value (NHV). These economic categories capture the less material and non-material values that reflect for the religious community the awe and self worth, the beauty and importance of God's good creation. Spiritual Value is then:  $SpV=BV+EV+NHV$ . It is a real factor in how many people value the environment and needs to be carefully considered when doing a benefit-cost analysis. (Individual, San Diego, CA - #A21653.75900)

**754. Public Concern: The Forest Service should consider the positive effects of ski areas on local economies in greater depth.**

We are glad to see that, in this question, the Forest Service is giving as much emphasis to social and economic consideration in evaluating inventoried roadless areas as it is placing on environmental values and other characteristics. The Forest Service needs to recognize the high demand for recreation on public lands and the contribution that ski areas make to the economies of the local communities. To bring this about, we suggest consideration of the following information:

Annual skier days on Brundage are currently in the neighborhood of 100,000. This means that for 100,000 times each winter a visitor devotes one day of his/her time and a significant amount of disposable income to recreating on National Forest lands at the resort. This alone, without even considering the people using the summer mountain bike program, conferences and musical events, demonstrates that the public endorses the resort and provides some measure of the amount of money brought into the community of Brundage.

Also to be considered is the economic contribution the resort generates in the City of McCall and other nearby communities in the way of direct employment, payroll and spin-off patronization of other secondary businesses such as restaurants, bars, service stations, etc, i.e., the multiplier effect. (Permit Holder, McCall, ID - #A15317.75540)

**755. Public Concern: The Forest Service should incorporate the positive contribution of wilderness to nearby real estate values into its economic analysis.**

The segment of society that is moving to regions for their wilderness and quality of life values, clearly, want to see the area they are moving to protected. A direct result of this can be seen in the increasing private property value associated with a property's proximity to protected publicly owned wilderness. In an analysis of protected wilderness in the Green Mountain National Forest in Vermont and private property values in relation to the wilderness, Phillips (1999) found that towns could be expected to have an average of 13 percent more valuable private property if they were in the immediate vicinity of designated wilderness than if they were not. (Organization, Missoula, MT - #A17234.75440)

**756. Public Concern: National Forest System lands should be appraised and taxed like private lands.**

**INCLUDE NON-MARKET ECONOMIC VALUES IN APPRAISALS**

**Finding equity values for forest resources**—Commercial resources extraction has dominated the management agenda of federal forest lands. How can the Forest Service develop methodologies to equitably value all forest resources? And how can local government derive equitable compensation for forest land uses. Social scientists have been working on non-commodity for decades. While there is much work yet to be done, methodologies now in existence can significantly improve forest management.

Federal forest land should be appraised and taxed just like any other landowner. The argument that comparable market values are lacking is a weak excuse. If the methodology is good enough for private timber lands, range lands and recreation lands, why isn't it good enough for federal lands?

In most western interestingly timber lands yields little tax while recreational land and scenic land yields high taxes. I would suggest this is because recreation and scenic values are actually more important to westerners than logging. Why do we, for instance, pay professional baseball players, rock and roll musicians and movie actors high salaries and professional loggers low salaries? . . .

The US Forest Service can either learn to value non-commodity resources or perish. (Individual, Colville, WA - #A20889.75800)

## **757. Public Concern: The Forest Service should consider the economic value of healthy ecosystems.**

Critics of roadless area conservation contend protecting public lands will adversely affect economic growth. But evidence strongly shows that economic vitality and conservation of wild forests are not mutually exclusive. In fact, the economic health of rural communities that contain a large portion of federal land is actually ENHANCED by wildlands protection. For example, extractive industries no longer drive the economic engines of rural California. High tech business, tourism, recreation, and outside investments have helped diversify local economies in the Sierra Nevada, replacing the boom and bust cycles of unsustainable extractive industries. As a result, Sierra Nevada, once dependent upon activities like logging and mining, are thriving in large part because of the unique quality of life attributes public lands provide (see below for more details on shifting economics). The overwhelming contribution National Forests make to the economy is in the form of “ecosystem services”—products of the function of the Earth’s living systems society does not have to pay for but needs nonetheless. Those “services” include clean air and water, pollinators, pollution filtration, and topsoil. An economic analysis of the world’s native forests recently concluded that the ecological services of forest ecosystems worldwide was worth at least \$4.7 trillion per year (Constanza, et al. 1997). Moskowit (1999) estimates that ecological services make up 83.1 percent of the economic contribution of National Forests. (Recreation is the next highest sector, with 10.2 percent. Fish and wildlife make up 4.1 percent. Resource extraction contributes 2.7 percent.). It is also important to note such services are not merely amenities. Natural ecosystems literally sustain humans and other species, a formidable argument for the preservation of wild forests and rivers. (Organization, Nevada City, CA - #A4941.75540)

Decisions to allow logging, mining, public land grazing and motorized recreation are also decisions that degrade social values such as biodiversity, high quality wildlife habitat, clean water, and human powered recreation opportunities that are enhanced by natural ecological and quiet conditions, etc. Semi-natural forest matrix areas accessed by nearly 400,000 miles of existing roads already comprise most national forest land. In light of the fact that over 70% of USFS land is already roaded, and has in many cases already been logged, these broader, non-market social values must come first in areas that remain roadless. (Individual, Corvallis, OR - #A650.75800)

It is essential to protect what few natural settings and open space we have left in this country. In the long run, and if we internalize factors that are often not part of our cost accounting—for example, the function of roadless forests in maintaining water quality, air quality and fish habitat—economic considerations strongly favor wide roadless protection. This is especially true given that the Forest Service has acknowledged they will lose money on roadbuilding activities in these areas. Less than 1% of the nation’s wood supply would be provided by logging in these areas, and they are in hard-to-reach areas—or they would already have been logged. Road construction to support destruction of the naturalness of these lands would be at taxpayer expense and the only benefactors would be timber corporations. Very few local and sustainable jobs would be created, since the jobs would disappear on completion of the logging, as demonstrated previously. Solitude, recreation, ecosystem and watershed protection should be the priority for the roadless areas. (Individual, No Address - #A6110.75000)

The Forest Service has already adequately identified roadless area values through the public involvement process for the Roadless Area Conservation Rule. Roadless areas include the economic benefits associated with: 1) recreational opportunities and tourism, 2) commercial and recreational fisheries within the boundaries of National Forests and downstream and offshore, 3) habitat for important game species and hunting both within and outside of the National Forests, 4) water for cities, industries, businesses, and individual households downstream from National Forests, 5) the regulation of water flowing through rivers and streams, including flood control, 6) non-timber forest products such as wild mushrooms, herbs, and medicinal plants, 7) mitigation of global climate change through absorption and storage of vast amounts of carbon, 8) enhancing the quality of life of neighboring communities, 9) harboring biological resources that either have value now or have as yet unknown but potentially large economic and social value, 10) harboring biological and genetic resources that can improve the long-term productivity of all forest land, 11) pest-control services provided by species that prey on agriculture

and forest pest, and 12) pollination services provided by species that pollinate important forest and agricultural crops. The real economic value of national forests comes from recreation and environmental quality of life, which the Roadless Area Conservation Rule carefully preserves. (Individual, Santa Fe, NM - #A19211.75500)

The overwhelming contribution National Forests make to the economy is in the form of “ecosystem services:” products of the function of the Earth’s living systems society does not have to pay for but needs nonetheless. Those “services” include clean air and water, pollinators, pollution filtration, and topsoil. An economic analysis of the world’s native forests recently concluded that the ecological services of forest ecosystems worldwide was worth at least \$4.7 trillion per year (Constanza, et al. 1997). It is estimated that Forest Service recreation directly contributes \$10 billion annually to private sector outdoor gear sales, and contributes directly to the economy \$7.94 billion through recreation programs and \$3.04 billion through fishing and hunting (Moskowitz, 1999). Moskowitz (1999) estimates that ecological services make up 83.1 percent of the economic contribution of National Forests. (Recreation is the next highest sector, with 10.2 percent. Fish and wildlife make up 4.1 percent. Resource extraction contributes 2.7 percent.) It is also important to note such services are not merely amenities. Natural ecosystems literally sustain humans and other species, a formidable argument for the preservation of wild forests and rivers. (Organization, Portland, OR - #A12004.75800)

It is vital that non-traditional values of these forests be considered. Ecosystem services include flood control protection, soil and slope stability, erosion control, pest control, and maintenance of soil fertility and water infiltration. In other words, the healthy functioning of the forest and the watershed provides significant real value to communities. The value of intact ecosystems to local economies—lifestyle, real estate values, tourism, clean drinking water, fishing, and beauty—must also be considered. (Individual, Ashland, OR - #A23399.75800)

#### **INCLUDING THE ECONOMIC BENEFIT OF EXISTENCE VALUES**

Recreation is the highest sector of economic output from the National Forest System that can have a market value figure put on it, and reflects society’s appreciation of natural areas. However, there is also the economically important consideration of “passive use” or “existence value” benefits that society places on natural areas. This reflects many people’s strong emotional attachment to nature and feeling that it should be protected regardless of whether they plan to travel to a specific area and recreate in it or use it in any specific way. The simple knowledge that a species has not gone extinct or that a forest remains standing is of enormous importance to a large segment of society, whether or not they will ever encounter the species in the wild or visit a roadless area. These people are often willing to pay to keep areas protected simply for the sake of preserving nature. In its analysis of use, the Forest Service does not even include existence value as a category (USDA Forest Service, 1990). This element of economic output from the National Forest System is tremendous, but is also extremely difficult to quantify. (Organization, Missoula, MT - #A17234.75540)

According to a January 12, 1998 letter to President Clinton signed by some of the country’s leading economists, such a focus [on commodity values] 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 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). (Organization, Portland, OR - #A12004.75800)

The “passive use” or “existence value” of natural areas is also economically important. This reflects many people’s strong emotional attachment to nature and feeling that it should be protected regardless of whether they plan to travel to a specific area and recreate in it or use it in any specific way. The simple knowledge that a species has not gone extinct or that a forest remains standing is of enormous

importance to large segments of society, whether or not they will ever encounter the species in the wild or visit a roadless area. These people are often willing to pay to keep areas protected simply for the sake of preserving nature. (Organization, Bozeman, MT - #A22092.75800)

The economic impact of a roadless area designation to the local communities should not be used as a limiting factor of such designation. The National Forests are for everyone, not just for some local community to sustain itself on. The Forest Service should consider existence value above the value to the local economy, how much do Americans as a whole value the existence of an intact ecosystem or wilderness. That way, you could use the appropriate metric, the sentiment of the American people, to gauge such decisions.

You should consider the impact to the environment of fragmenting an intact ecosystem with roads. This is a change that can have permanent impacts and, as yet, has not been given the appropriate significance in the Forest Service.

You should consider the fact that National Forests were intended to be America's reserve of natural resources. If we cut down all of the old-growth timber, other than the amount required by specific species, then we have none left for 80+ years (depending on how "old-growth" is defined). How is that reserving the resource for the future? It will just eventually result in another "timber industry vs. species X" scenario. We will have to disallow timber harvest because we've removed all but critically important habitat to a species listed under the Endangered Species Act. Our National Forests should have some resemblance to an actual reserve, rather than just one big shopping cart for the timber, mining, and other extractive industries. We have to actually set something aside in order to have a reserve, so let's set the roadless areas aside. (Individual, No Address - #A29243.45000)

#### **INCLUDING QUANTIFIED ECONOMIC VALUES FOR CLEAN WATER**

Frankly, I am sick of the "economic" considerations so often used to justify environmental degradation. All of the legislation that guides the FS today was initiated in response to the fact that industry will maximize profits to the detriment of all other factors. This was deemed incompatible with the American dream.

Externalities are never factored into economic equations. Can you put a price tag on clean drinking water? Until you do, environmental degradation will appear, on paper, to be economically expedient. But if you factor in the cost of purifying water for the entire Columbia Basin, logging as we know it would cease. (Individual, Lewiston, ID - #A29569.75800)

### ***Adequacy of Analysis – Economic Effects of a National Roadless Rule***

#### **758. Public Concern: The Forest Service should quantify recreation-based economic effects of a national roadless rule.**

Local decision making must take into consideration the amount of public access and recreation opportunities that are currently supported by these lands, and the effects of the future reductions caused by this decision, particularly in rural communities. Quantifiable recreation-based data from industries, rural tourism associations, and user groups that will be impacted by the reclassification of roaded and roadless areas must be analyzed in great detail prior to implementation of proposed rules for roadless area management. Again, the most practical means of accomplishing this is through the local Forest Plan Amendment process. (Elected Official, Alpine County, CA - #A8597.75540)

Demand for dispersed recreation opportunities in public wildlands is increasing, in an environment of diminishing supply (Morton, 1999). In the literature, the average value per recreation day was \$42. The literature also indicated that protecting a 10,000-acre roadless area in the West provides 3,875 visitor days per year, for an estimated annual \$162,750 in recreation value to visitors (Ibid.). Protecting 10,000 acres in the eastern portion of the country yields approximately 11,000 visitor days per year, with an annual recreation value to visitors of \$462,000. Maintaining all 42 million acres of national forest roadless areas in the conterminous United States would support 14.6 million visitor days of non-

motorized recreation, worth \$600 million in annual recreation benefits to the visitors (Ibid.). (Organization, Denver, CO - #A21367.75540)

Opponents of wildlands protection often argue that protecting public lands locks up resources, locks out people, and is bad for the economy. Facts state otherwise. The benefits of protecting roadless areas—from protecting watershed and wildlife habitat to providing much sought-after backcountry recreation opportunities—are immense and have been well documented. Although roadless wildlands are highly valued by society, without formal markets, the benefits of wildland conservation are often difficult to quantify in economic terms.

The record number of public comments received by the Forest Service in support of the roadless policy provides empirical recognition and support for the multiple uses and benefits generated from roadless area conservation. While no quantitative estimate of the benefits of the rule was provided in the Roadless EIS, the Forest Service believes the benefits of the rule outweigh the costs (USDA Forest Service 2001, Regulatory Impact Analysis). In a more sophisticated analysis, Loomis and Richardson (2000) estimated that in their current, unroaded condition, Forest Service roadless wildlands in the lower 48 states can be expected to provide almost \$600 million in recreation benefits each year, more than \$280 million in passive use values, and nearly 24,000 jobs. The authors also estimated annual benefits from roadless area ecosystem services to include between \$490 million and \$1 billion worth of carbon sequestration services as well as \$490 million in waste treatment services (Ibid, pp. iii-iv). Estimating the net impacts of the roadless rule should fully account for the benefits of conserving roadless areas as well as the potential costs with respect to the decline in quality and quantity of the other multiple uses generated by the public estate as a result of exploiting energy resources. (Organization, Denver, CO - #A21367.75800)

## **759. Public Concern: The Forest Service should analyze the impacts of a national rule on recreation-related economic activity.**

### **NEGATIVE EFFECTS OF A NATIONAL RULE ARE UNDERESTIMATED**

The DEIS is remiss in making no specific estimates for the impact on recreational uses (either good or bad). So the reviewer is really left with nothing to comment on—this is certainly a gross defect of the DEIS. The reviewer will again take a stab at estimating the impacts—not to claim it to be a true economic analysis, but rather to show that the impact on recreation, even if its a small impact, may be substantial in terms of economics. Using the Draft 1995 RPA report, it is estimated the impact of recreation on the national economy from National Forest recreation is \$98 billion. Road-based recreation accounts for the major recreational use of the National Forests.

But the DEIS claims that there will be little impact from Alternative 2, 3, or 4, because it will not close roads or trails. But the cumulative impact will certainly be noticeable because: 1) roads will no longer be built, which will reduce any growth in the recreation industry; 2) roads are being closed in otherwise roaded areas to meet other forest objectives; and 3) road definitions are changing that will allow trails to be no longer classified as trails or roads and thus be closed. How much will recreational use of the forest be reduced? If such recreational reduction is only 5%, that would amount to a \$4.9 billion economic loss. Whether or not this number is accurate is not important for this discussion, but what is important here is that the impact is so potentially large that the DEIS is very lacking in not doing a real economic analysis of that impact. (Union, No Address - #A28881.75540)

### **POSITIVE EFFECTS OF A NATIONAL RULE ARE UNDERESTIMATED**

The argument that roadless areas are essential for a healthy tourism industry is further supported by the example of . . . an original permit holder at Pack Creek bear observatory, a ship captain who has been guiding boat tours of the Tongass for the past 25 years. [He] now captains a small charter boat known as the *Discovery*, and I spent a week with him on it in July 2001. In his words, “If it was up to me this would all be protected as wilderness.” [His] comments come from his intimate connection to the Tongass, even to individual whales and brown bears, and his love of the wild nature that is so unique to Alaska. But [he] is an independent, smart and reasonable man. He understands the nature of humans in Alaska as well, and, though it is hard for him, he shares the beauty of Alaska with more and more tour

boats and tourists every year. That is why it was even more convincing when he said to me as I showed him Forest Service planning maps that put Roadless areas east across Stephens Passage from Admiralty Island on the chopping block, “People don’t want to come to Alaska and see clearcuts!” As we sat in the water just below these roadless areas with two humpback whales just yards off our bow, just off a small island hosting both and stellar sea lion rookery and harbor seals, John was blown away by what the maps clearly showed was scheduled.

There are hundreds of sustainable businesses like [this] that will absolutely suffer if big corporations maintain access to exploit the riches of these areas and take them away from the rest of the population. THE ROADLESS ANALYSIS TO DATE HAS NOT ADEQUATELY VALUED THESE BUSINESSES AND HAS UNDERESTIMATED THE IMPACTS TO THESE BUSINESSES. (Organization, Bloomington, IN - #A28110.75320)

**760. Public Concern: The Forest Service should analyze the impacts of a national rule on agency employment levels.**

The FEIS did not address impacts on Forest Service employees. We estimate that between 1,000 and 1,500 Forest Service jobs will be eliminated, with 300 of those being on the Tongass National Forest.

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 1,500 reduction in the number of Forest Service employees. Is that accurate?—no analysis was done. Other jobs could possibly be found, but that will not likely happen considering that the employment level of the Forest Service has fallen by 20% (about 7,000) in the last seven years, and there is no indication that any attempt will be made to retrain people (for example, to do jobs such as writing environmental impact statements). (Union, No Address - #A28881.75310)

**761. Public Concern: The Forest Service should address the impacts of a national rule on fair housing and lending provisions.**

ADA, Fair Housing, Federal non discrimination provisions, private and federal lending criteria and other areas of interest most often under Federal law, the review of States, Indian and Public Housing authority, or agencies such as HUD and USDA-RD are inadequately addressed in the proposed rule and current FS policy. Housing issues fundamental to and integral with local and state planning efforts are not fully considered in the proposed rule and existing FS policy. (Union, No Address - #A30595.70300)

**762. Public Concern: The Forest Service should assess the cost of withdrawing millions of acres from the country’s natural resource base.**

Public Concern: The Forest Service should provide the public with an assessment of the opportunity cost of withdrawing millions of acres of land from our country’s natural resource base. These lands contain valuable reserves of oil, gas, coal, timber, and many other minerals. If we are no longer permitted access to these resources, then the Forest Service should provide information detailing where they will come from, what the national security implications of outsourcing are, and what will be the likely consequences of outsourcing these materials in other parts of the world. (Organization, Maryville, TN - #A8754.65000)

*Analysis of Analysis – the Roadless Area Conservation Rule EIS*

**763. Public Concern: The Forest Service should better explain the methods and data used in the economic analysis for the Roadless Area Conservation Rule EIS.**

I am also concerned with the economics of the “roadless” proposal. You say \$565,000 would be “saved” from road maintenance costs—how was this figure computed? Did you calculate any “cost” to lost revenue from foregone resource opportunities lost???? You say the “roadless” designation could cost \$21,000,000 in (lost) timber revenue—how was this figure determined—at what stumpage rates—have

these timbered areas been adequately cruised??? What other natural resource values have been estimated (if any)—what about mineral potentials???? (Individual, Tucson, AZ - #A5625.75900)

**764. Public Concern: The Forest Service should correct the Roadless Area Conservation Rule EIS timber-related job data to account for the fact that most employment resulted from taxpayer subsidies of below cost sales.**

The Roadless Area EIS is not only misleading, but also gives the impression it seeks to foster protests from those who believe they will be cut off from the subsidized largesse they desire from the resources on these lands. The estimate of 26,610 timber related employment from the total 3,214 MMBF estimates cut doesn't match the TSPIRS jobs data. But not to worry; this claim, which projects a \$39,000 annual job income, isn't worth the paper it's printed on. (ibid @ S 32) The EIS totally ignores that 94% of the 65,557 jobs claimed for the 9 years, 61,657 jobs were subsidized because timber sales were -\$1.32 billion in the red for the 9 years, 1992-2000. (Professional Society, Saint Leonard, MD - #A9040.75710)

**765. Public Concern: The Forest Service should correct the Roadless Area Conservation Rule EIS timber program cost analysis to include payments to counties.**

The Roadless Area EIS is not only misleading, but also gives the impression it seeks to foster protests from those who believe they will be cut off from the subsidized largesse they desire from the resources on these lands. Whenever running an analysis of the timber program, such as TSPIRS, the Service always omits COUNTY PAYMENTS, CLAIMING THEY ARE IRRELEVANT. WHEN ANALYSES ARE DONE FOR A PROPOSED WILDERNESS OR A PLAN TO CURB ROAD BUILDING, REMARKABLY ESTIMATED LOSS OF COUNTY PAYMENTS APPEARS ON CENTER STAGE. (EIS @ S-32). By November 2000 when the EIS was issued by President had already signed the law disconnecting timber and other receipts from paying 25% to the counties. Old habits die hard. This "red herring" makes its typical appearance. One of the vain hopes in changing the 25% county payment law was that disconnecting county payments as a cost would make timber sale losses evaporate. Red ink is so indelibly etched into the costs of running sales that no sleight-of-hand will make losses disappear. My estimate relying on F.S. data, OMITTING COUNTY PAYMENTS, is that 86 of the 109 Forests ran - \$1.32 billion in the red for the 9 years, 1992-2000. Each job costs \$2,400. The cost per job jumped from \$1,828 in 1992 to \$3,258 in [2000], up by 1.8 times. With county payments counted the job costs rises to \$4,600 each. (Professional Society, Saint Leonard, MD - #A9040.75730)

## Economic Effects

### Summary

**General Effects on Local Communities and Economies** – General comments on this topic revolve around the consideration of the economic benefits of roadless protection to state and local economies. One organization cites a study which, it claims that contrary to popular belief, protected areas are more economically beneficial to rural communities than the relationship between natural resource dependant industries and the same communities. Respondents point specifically to the importance of protected areas to companies seeking locations which offer a high quality of life. One elected official comments that proximity to roadless areas is a very important tool in interesting companies and people in staying in and moving to their town.

**Effects on the Resource Dependent Communities and the Timber Industry** – Comments about the possible effects of a national roadless rule on the timber industry are varied. Many people assert that the Roadless Area Conservation Rule will have a significant negative impact on resource-dependent communities generally and timber-dependent areas specifically. One individual states, the federal government has almost destroyed the timber industry in Idaho. And is now worried that if more roads are closed, then it will be too expensive to remove trees,

making it impossible to stay in business. Other respondents assert that the Rule will not have a negative economic impact. They often cite the Final EIS's claim that only a small percentage of the available timber supply will be withdrawn and therefore that there will only be minor impacts to this sector. These respondents often state as well that negative economic effects have generally been exaggerated by those who ask that the Rule not be implemented, and that the timber industry itself is most to blame for the current slowdown. Over-harvest, mechanization, the global timber trade, and lack of long-term vision have all contributed to its decline, not environmental concerns, these respondents assert.

Some say that the Forest Service has failed to follow its "sustained yield" mandate, as demonstrated by declining timber removal volumes. Some state that the Agency should focus timber removal activities in roaded areas, and also help local mills to retool in order to process smaller diameter stems. Others assert that chip mills are inferior economic engines for local economies, with lower wages and benefits to communities.

Finally, some respondents urge the Forest Service to continue to utilize natural resources from roadless areas in order to meet American consumer needs. Some cite the increasing cost of homebuilding in their request that a national rule not be implemented. Others, however, say that they would rather change their buying habits and purchase more sustainable products in order to end timber removal and other resource commodity use in roadless areas. (See also Chapter 5: Activities (Question 7): Timber Removal.)

**Effects on the Agricultural and Ranching Sector** – Those who discuss the effects of a national rule on agricultural and ranching economies state that a national rule will have detrimental impacts. One respondent specifically requests a review of aquatic species protection on agriculture, since recent drought conditions have exacerbated conflicts between wildlife and rural communities. (See also Chapter 5: Activities (Question 7): Grazing.)

**Effects on the Mining, Oil, and Gas Industries** – There are several comments that directly address effects of a national roadless rule on mining, oil, and gas industries and the communities that are dependent upon them. They state that the Forest Service should not implement the Roadless Area Conservation Rule or any national policy that restricts locatable and leasable mining exploration and development in roadless areas. Some respondents discuss specific lease areas or mining operations which, they believe, are threatened by the Rule, such as coal mines in the West Elk Roadless Area, the gold mines in Jerritt Canyon on the Humboldt-Toiyabe National Forest, and oil and gas leases on national grasslands in North Dakota. These respondents request that the Rule be dropped, or that it be modified to exempt all mining activities in roadless areas. They assert that the Rule will have serious negative effects on local communities and the nation's mineral industry and supply. One respondent questions the allegation that mining results in higher road costs to the Forest Service, since they must post special bonds for road maintenance.

Some question the claim that the Rule will have any noticeable effect on the nation's supply of energy or minerals because, they say, only a relatively small percentage of the total reserves are located in roadless areas. (See also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Mining Laws General, Mining Law of 1872, and Mining and Mineral Policy Act*; and Chapter 5: Activities (Question 7): Mining, Oil, and Gas Development.)

**Effects on the Recreation Sector** – A number of respondents cite positive economic benefits to the outdoor recreation and tourism sectors as a prime reason for implementing a national roadless

rule. People assert that the Roadless Area Conservation Rule correctly places emphasis on non-commodity uses and recreational values of roadless areas, and state that the tourism industry is a viable economic base for communities near roadless areas. Some respondents ask that a national roadless rule be implemented as long as it does not exclude mountain biking from these areas. They believe their expenditures provide an increasing economic boon to areas with good opportunities for their sport.

Others assert that a national roadless rule will best protect game species habitat and superior hunting and fishing opportunities, which in turn will directly benefit local economies. Many small business owners, from professional photographers to gear shop and lodging owners to outfitter/guides, ask that roadless areas be protected in order to support their economic well-being. Some question the claim that a national rule will restrict recreation and therefore rural economic development, citing statistics that demonstrate the opposite trend.

Other respondents ask that a national rule not be implemented, and state that the economic contributions of motorized sports to local economies will be reduced. As one individual points out, there are many outdoor recreational activities, such as camping, hiking, horseback riding, fishing, hunting, bird watching and other wildlife observation that are economic contributors and all rely on the availability of good roads. Several others ask that the rule exempt ski area expansion or that the rule be abandoned entirely. Some ask that the rule not restrict horseback riders access to roadless areas due to their economic contributions to the economy as a whole. (See also Chapter 5: Activities (Question 7): Motorized Recreation, Off-Road Vehicles, Snowmobiles, Non-motorized Recreation, Mechanized Recreation, Ski Area Development, Hunting and Fishing, Outfitter-Guides, and Equestrian Use.)

**Effects on Employment** – A number of comments regarding the possible employment impacts of a national rule are closely related to comments about economic effects to communities and businesses generally. Comments are vary between those who assert that a national rule will have favorable effects on local employment due to economic diversification, and those who state that it will eliminate too many high-paying commodity-related jobs, resulting in further economic deterioration of rural communities. Some respondents assert that the Forest Service has exaggerated job losses, and that the local commodity-based economies are inherently unsustainable. Some say that export of raw logs for processing abroad has had a negative effect on domestic employment; others state that the timber industry itself is to blame for unsustainable harvest levels which have led to the current environmental concerns and lower timber harvest levels from public lands. Others say that less expensive Canadian lumber is flooding the market, and assert that lowering Forest Service stumpage rates is not the answer to this problem.

A number of people write to request that the Roadless Area Conservation Rule not be implemented, and state that their businesses and the jobs they create are at risk from this Rule. Likewise, some state that no restrictions should be placed on mining activities in roadless areas in order to preserve high-paying jobs in this industry. Some respondents question the benefits of diversifying local economies toward tourism-dependent business activity. They assert that tourism-based jobs are often seasonal, low-paying, and rarely provide health or retirement benefits to employees. These respondents cite the historical viability of their rural communities and credit the timber related jobs as the reason. They now worry that these jobs have disappeared and see citizens having to work 2-3 jobs and still not making ends meet, plus there are no benefits attached to these low paying service jobs.

A few respondents ask that, if job losses do result from a national rule, the Forest Service provide job training to displaced workers. A few suggest that these workers be employed in ecosystem restoration projects. Others assert that the Agency is not responsible for employment levels; private sector employees in non-commodity industries often face layoffs and dislocation too, thus they say, timber workers should not be given special treatment.

**Effects on Tax Receipts** – A number of respondents believe that a national rule will result in the loss of tax receipts from local businesses as well as reduced payments from the federal government that are tied to resource extraction levels. People comment in particular on possible reduced funding for local schools and public services. Some say that reduced payments to states were not adequately considered in the Roadless Area Conservation Rule Final EIS and should be better analyzed at this time. Respondents are also worried that there will be a drop in mineral royalty payments and so request that these activities be exempted.

Some urge the Forest Service to compensate local communities for losses due to a national rule. Others state that the best way to address any decrease in federal payments is to completely overhaul the financing system; such an overhaul, some suggest, could include taxes on raw materials to support affected communities. Others assert that these payments should not be made up with other federal payments because they imply welfare or attempts to buy local support for a national rule.

**Effects on the Global Economy** – Respondents who discuss global economic considerations generally assert that the United States should make use of its own natural resources to avoid dependence on foreign sources of raw materials. These sources may be threatened by political instability or supply disruptions, some state, and therefore the Roadless Area Conservation Rule should not be adopted because it would limit locally available resources. Some people also comment that a national rule would result in the transfer of environmental effects of resource removal to less environmentally conscious countries. Others say it is unwise to continue to export our own forest resources, such as Alaskan timber, to other countries and generally ask for implementation of a national roadless rule. Some urge the Forest Service to take the lead in setting an example for the rest of the world about truly sustainable forest management and rainforest conservation.

### *General Effects on Local Communities and Economies*

#### **766. Public Concern: The Forest Service should consider the economic benefits of roadless protection to state and local economies.**

Southwick Associates (2000) examined 410 counties across the western US to document the relation between county growth and employment levels and the percentage of lands in protection within 50 miles of the county center. This study demonstrated that while many argue that protecting lands from extractive activities is especially harmful to rural communities the relationship between economic growth and protected areas was stronger than the relationship between economic growth and extractive activities:

During the period 1969-1997, in western rural counties, the amount of protected lands within 50 miles of a county's center was positively and significantly correlated with employment growth and with income growth. The amount of Forest Service roadless areas within 50 miles of a county's center was positively and significantly correlated with employment growth and with income growth. Accordingly, counties containing protected lands are more likely to experience stronger economic growth than those without. Further, counties with the highest proportion of land in protected areas are growing the fastest:

Employment in non-metropolitan counties with more than 10% protected areas grew more than 1.85 times faster than the average non-metropolitan county.

Employment in non-metropolitan counties with more than 10% Forest Service roadless areas grew more than 1.43 times faster than the average non-metropolitan county.

Income in non-metropolitan counties with more than 10% protected areas grew more than 1.4 times faster than the average non-metropolitan county.

Income in non-metropolitan counties with more than 10% Forest Service roadless areas grew 1.25 times faster than the average non-metropolitan county.

The study concluded that . . . the presence of Forest Service roadless or protected areas was not correlated with slower income or employment growth in any of the county clusters. This means that the statistical test could not find any indication that roadless or protected areas have caused county economies to grow slower. Instead, there is evidence that for some county types the presence of roadless areas was correlated with income and employment growth. (Organization, Ashland, OR - #A20421.75500)

#### **DUE TO THEIR IMPORTANCE TO COMPANIES SEEKING LOCATIONS WITH HIGH QUALITY OF LIFE**

For economic concerns with respect to roadless areas, the founder of the company I work for started Bend Research in Oregon to be near public land amenities. Part of the “quality of life” drawing care we use to lure new qualified employees is recreation opportunities on public land, including roadless areas. Grant County would do better to emphasize public land recreation in their economic development, rather than trying to return to the timber industry-dominated past. (Individual, Bates, OR - #A15564.75540)

Economic statistics show that protection of public roadless lands is consistent with a thriving economy, and maintains the natural capital that forms the foundation of Colorado’s identity, quality of life, and economic well being. . . . It is high quality of life offered by Colorado that continues to attract our educated workforce, drawing new high-tech businesses to locate here. (Organization, Denver, CO - #A17162.75540)

Proximity to roadless areas is a very important tool in interesting companies and people in staying in and moving to our town. We promote our nearness to those wild resources that few other places in this great nation have been able to preserve. Our future lies in the preservation of those few wild places that are left in our region. Montana has a dismal history of short term reliance on extractive industries that abuse then abandon the resources they touch. The pro development community would have us stuck to that same tar baby again. Let’s learn from our past experience. The Good Lord isn’t making any more of those few wild acres that are left. (Mayor, City of Great Falls, MT - #A28912.75500)

Washington State is in a unique position to emerge as a respected leader in the so-called ‘green movement.’ Our state holds a large portion of the lands protected by the Roadless Area Conservation Rule, and yet our internal economy is not as highly dependent on the logging industry as are other states in a similar position. Protection of our forests can be viewed as a boon to our state as it makes us more enticing to outside investment that is looking for a corporate home that offers an educated population, high tech resources, and a high quality of living for its workforce. Mining or logging our currently protected forests would be in direct opposition to the efforts of a great many programs at work in Washington to attract new industry. (Individual, Auburn, WA - #A1347.75700)

#### **767. Public Concern: The Forest Service should protect roadless areas to prevent future financial burdens caused by flooding.**

Millions of dollars in damages can be caused by severe flooding. Roadless and unlogged watersheds could help to mitigate the severity of the floods and thus save millions of dollars and a lot of human suffering. This may be especially important if we experience climate change. (Individual, Las Vegas, NV - #A5694.51330)

Recent severe flooding in Southern Virginia during a major storm event has been linked to upstream logging on both private and public (National Forest) lands. This damage, running into the millions of dollars locally, was also responsible for loss of life and human suffering, not to mention the impacts on the wildlife populations in that stream channel. Many Appalachian communities, nestled in narrow stream bottoms, are especially susceptible to such catastrophic damage as a result of mining and logging operations and their associated roadbuilding at higher elevations. Communities wind up bearing the brunt of these actions, while corporate players reap the profits on public lands at taxpayers' expense. (Organization, Bland, VA - #A17007.75700)

**768. Public Concern: The Forest Service should consider the economic impacts of weakening protection for roadless areas in the White Mountains.**

The Roadless Area Conservation rule (as published in January 2001) already provides exceptions that allow roadbuilding when needed to address concerns of wildfires and forest health and management; so, any argument that closure is a detriment is just plainly a non-starter. Not only am I concerned that changes to the rule will significantly weaken protections for the designated areas in the White Mountains which would definitely have an impact on tourism, I am equally concerned at the unequal playing field and economic disadvantage created by such proposed re-openings. Woodsmen and loggers in my part of New Hampshire do not have the luxury of such Federal largesse or indirect subsidy and cannot benefit as those on the other end of the state who would have direct access to the areas in question. (Elected Official, State of New Hampshire - #A4951.75200)

*Effects on Resource Dependent Communities and the Timber Industry*

**769. Public Concern: The Forest Service should consider the negative economic impacts of roadless protection on the economy.**

**ON RESOURCE-DEPENDENT RURAL COMMUNITIES**

The rule does not represent a balanced approach to forest conservation. However, it does create havoc in rural communities which depend on logging, ranching, mining, and drilling. (Individual, Manchester, NH - #A1183.75300)

The entire management of the forests needs to be reviewed to ensure that decisions affecting the viability of each individual forest and the very communities dependent upon the forest for their existence are not regulated out of existence by distant agencies, generic national rules, nor by influential special interests wielding indiscriminate political power over the Agencies mandated with performing this task. (Business, Juneau, AK - #A30599.13100)

*The Forest Service must analyze potential impacts on community and provide property, and must give these national forest neighbors meaningful opportunities to comment on decisions about federal lands.* One key ingredient of communities is a healthy economic environment on which to base the livelihood of individuals living in the community. Economic development and/or the use of natural resources within the National Forest are key components of the economic viability of communities near the forest. The Forest Service must, at a minimum, seriously consider any and all economic impacts that a "roadless" designation might inflict upon nearby communities that could be affected by such a designation. (Individual, Reno, NV - #A20857.75500)

First you must consider the economic impacts on the area served. Will roadless areas destroy local economies? If they do, make some adjustments. 'My way or the highway' is not the proper tack for a government that constitutionally is pledged to preserving individual rights. Sometimes as the Supreme Court has said in numerous decisions, the rights of the few will supercede the rights of the many. I also believe you have the duty to protect small town America and it's unique way of life. The rights of the Sierra Club, Earth First, etc., should not supercede the rights of those who live in rural America. (Individual, No Address - #A834.75300)

**ANPR Question 4-Protecting Communities:** One key ingredient of communities is a healthy economic environment on which to base the livelihood of individuals living in the community. Economic development and/or the use of natural resources within the National Forest are key components of the economic viability of communities near the forest. The Forest Service must, at a minimum, seriously consider any economic impact that a “roadless” designation might inflict upon nearby communities that could be affected by such a designation. (Association, Novato, CA - #A17652.75300)

Rural economies will suffer from this action. In a county such as Lake County in Northeastern Minnesota, 58% of the land base is federal, and the timber that is grown and managed on federal lands is a very important resource. This resource is very important to the economy and social well being of Lake County. Recently, timber management by the Forest Service has not been an end in itself. For example, timber products coming off of federal lands have been the by products of aesthetic enhancement, wildlife habitat creation or fuel loading reduction management. It is important to understand the consequences of reduced timber quantities on the economy, schools, communities, local units of governments and the people of a region that is so largely dependent on the land for its way of life. When the majority of land in a region is controlled by an agency that no longer sees that resource as important as a product, there are many negative far reaching effects. (Elected Official, Lake County, MN - #A15552.75510)

#### ON TIMBER-DEPENDENT BUSINESSES

The timber harvest on the Nicolet has gone from the 96 million board feet per year the operating plan to 40 million board feet currently. This has already caused abandonment of the only railroad in Florence County-The N.B.N. Railroad. The new “Roadless Area” when coupled with all the other Forest Service set asides such as Ladd areas, wilderness, semi primitive non motorized areas, research natural areas, Wild River classifications and River-Lake corridors have heavily impacted the multiple use of our Nicolet National Forest. The Preservation goal of “No Timber Cutting on Public Lands” is rapidly approaching and with it goes the economic viability of Florence County and my company-Pine River Lumber Company, Ltd. Good management of our forest Service lands will protect these 50 jobs and still provide “all” the other multiple uses so important to National Forests Management. (Association, Long Lake, WI - #A8046.75320)

Three Rivers Timber, Inc., is a family owned, small business sawmill operation located at Kamiah, Idaho. Approximately 200 families are supported by jobs in the sawmill, woods operations, and trucking. The local national forests are the primary sources of both raw materials to run our operation, and recreational opportunities for our employees. (Association, Kamiah, ID - #A3685.75320)

**This letter is the voice of 40 people employed at Great Northern Bark Company.** It produces decorative landscaping bark which is shipped throughout the U.S., Canada, and Japan. Four thousand semi trucks of product are shipped each year which generates \$8 million of revenue. Obviously, Great Northern Bark Company is entirely dependent on nearby lumber mills who are in turn dependent on the forests. Many small lumber mills have already been forced out of business because of federal and international influence on the lumber industry. **The Roadless Areas Conservation Rule clearly threatens Montana jobs and the lumber industry further.** (Association, Columbia Falls, MT - #A26902.75300)

Central Point Lumber Company was a small log mill operating in Central Point, Oregon, until the fall of 2000. At that time, the mill which had been in continuous operation since shortly after the end of World War II, Central Point Lumber, shut down and was auctioned in the spring of this year. Central Point Lumber closed because without fee timberlands and the lack of a federal timber sale program on the national forests of southern Oregon and Northern California, it could not compete in a global market. As you are already aware, some 19 billion board feet of the 50+ billion board feet of softwood lumber consumed annually in the United States comes from Canada. Central Point Lumber Company and the 80-100 family-wage jobs it provided our local economy is gone forever. Should this economic

information be of interest to the Chief of the U.S. Forest Service? SOTIA believes the answer is yes. (Association, Medford, OR - #A17183.75400)

The federal government has almost completely destroyed the timber industry in Idaho. Don't destroy it altogether. It is much too expensive to log most areas using transportation means other than roads. Existing roads should all be maintained. Funding should be provided to do so. (Individual, Boise, ID - #A9.75200)

**770. Public Concern: The Forest Service should consider the economic benefits provided by the timber industry.**

Timber harvest is a boon to our national economy by providing good paying jobs to those who do the harvesting and to those who utilize the products to make paper and build the many types of construction. (Individual, Whitefish, MT - #A5102.75510)

**771. Public Concern: The Forest Service should act to create a more streamlined legal process to dispose of frivolous legal challenges to timber sales.**

**IN ORDER TO MAINTAIN THE VIABILITY OF SMALL MILLS**

Our state has an unbalance portion of Federal Lands, Forest Service and BLM. The poor management of these lands has decimated the smaller sawmills in the state because they were dependent upon Forest Service timber. Over the last 5 years, because the Forest Service was no longer a reliable source of timber, the smaller mills in Western Montana went out of business, leaving, for the most part, only the large timber companies who own their own timber. These companies can now dictate the price of timber from the National Forests because they don't have to buy Forest Service timber and there is no competition. The roadless initiatives, legal actions and the resulting long resolution time for disputed sales, and a Forest Service organization responding to politics not science has made the reasonable management of our National Forests a disgrace. Not only causing the loss of timber industry jobs but also allowing the build up of high fuel loads in the forests resulting in catastrophic fires in dryer years. I think this can be changed by a more streamlined legal process with recourse for frivolous legal challenges, control and management turned over to smaller local units, the State of Montana, or as I mentioned, to a quasi private organization. (Individual, Missoula, MT - #A4891.75100)

**772. Public Concern: The Forest Service should acknowledge that sustained yield has never been practiced, with prior over-harvest leading to current reductions in commercial timber volume.**

The economics of timber harvest on the western forests is questionable. It is our observation that the best timber has already been harvested on most National Forests and definitely over-harvested on the Bighorn National Forest. . . . Sustained yield was not understood or certainly not practiced and now we have a huge decrease in timber production and sawmills closed. The timber that remains will be very expensive to harvest, as it is located in the most rugged parts of the mountain. Road building will be extremely expensive for a product that can't pay the costs and at the expense of many other users including recreation, watershed quality and wildlife habitat. (Individual, Sheridan, WY - #A15725.75400)

I believe it is time to reevaluate the congressional mandate for the Forest Service to provide sustained yield of renewable resources. Past forest management has not provided sustained yield as required by the 1960 MUSYA Act, and public forests have been decimated over the past 40 years. Private logging should not occur on public lands at taxpayer expense. (Individual, Olympia, WA - #A6929.75600)

**773. Public Concern: The Forest Service should reiterate that negative economic impacts from reduced timber removal will be minimal.**

The Facts and Figures on the Economic Impact of Prohibiting Logging in the Roadless Areas of Montana's National Forests:

1. The Relative Importance of Forest Products in the Economy: Most of Montana's forest products industry is located in western and southwestern Montana. In the counties adjacent to the National Forests 3.4 percent of all jobs were directly related to forest products activity (11,000 forest products jobs out of 340,000 total jobs).
2. The Change in National Forest Timber Harvests and Local Economic Impacts: The peak year of harvest off of both federal and other lands was 1988. Since then the harvest from the National Forests has fallen by 76 percent or 473 million board feet (mmbf). During that same period the Montana counties adjacent to the National Forests added about 91,000 new jobs.
3. The Impact of Prohibiting Logging in Roadless Areas on the Local Economy: Between 1993 and 1999 the National Forest timber harvest that came from the inventoried roadless areas on the Montana NFs was 4 million board feet (mmbf). For the 2000-2004 period, the Montana NFs plan to harvest about 3 mmbf in the roadless areas. Thus, the "loss" to this part of the west central Montana economy of putting all roadless areas off limits to roading and timber harvest would be a small reduction in NF timber harvests, at most 4 mmbf or about 2 percent. If these NF counties in Montana were able to digest a 473 mmbf reduction during the 1990s without serious economic consequences, they should be able to digest a 4 mmbf reduction with ease. . . . The direct employment impact of a 4 mmbf reduction in NF timber harvest would be about 40 jobs. Each year during the 1988-1997 period about 10,000 jobs have been added in these counties. The 40 job reduction represents about 1 job out of every 8,500 jobs in the Montana NF counties. Less than two days of normal job growth would replace them. Thus, ignoring any economic benefits of protecting these areas, the economic cost of permanent protection would be a less than a one-hundredth of one percent reduction in employment or a 2-day pause in the region's ongoing economic vitality. (Organization, Missoula, MT - #A21359.75310)

The enactment of the Roadless Area Conservation Rule did have some impact in my industry in the Mid-Atlantic regions hardwood lumber markets with the closing of roadless areas in Monongahela and George Washington National Forests in West Virginia and in Virginia. The negative impact on the secondary products manufacturing segment was very short lived with domestic hardwood pricing stabilizing within 60 days. (Association, Hershey, PA - #A31493.75510)

**774. Public Concern: The Forest Service should focus timber removal in roaded areas.**

The Forest Service and our current national administration is too concerned with spending tax dollars to subsidize timber harvest in roadless areas and not concerned enough with proper management including regeneration and pre-commercial and commercial thinning in areas already roaded and committed to timber management. (Individual, Bozeman, MT - #A5649.75600)

The value of our National Forests can only be described as priceless. The worth of almost anything increases as it becomes more scarce, and we all know old growth forests are becoming rare. If we continue to allow further logging of our national forests, old growth forests and all the plants and animals that thrive in their environment will be lost. Anyone who traveled in other parts of the world has seen what happens to forests when the only criteria for protecting trees is economical. The famous Black Forest in Germany is basically nothing but a giant tree farm. The formerly forested British Isles are now hills of heather. We have plenty of commercial and BLM tree farms to support the timber industry. Leave what little remains of the old growth forests for our descendants to enjoy. The roadless ban is one small way to preserve the true value of our National Forests. (Individual, Port Angeles, WA - #A1044.70000)

**TO SUPPORT LOCAL MILLS**

There are plenty of road-accessible lands available for logging. Using the FS's own numbers, we estimate there are over 10 billion board feet of timber available for cutting within a quarter mile of the more than 4,650 miles of existing logging roads on the Tongass. That's enough to support sustainable, small-scale, locally owned, high-value timber businesses. (Individual, Auke Bay, AK - #A8021.90130)

**775. Public Concern: The Forest Service should implement a national rule to encourage private forest landowners to make more efficient use of their resources.**

Corporate interests need to better utilize the vast land assets they still retain. Humans need to make more efficient use the vast tracts they already occupy and dedicate to their exclusive use and pleasure. It is simply imperative that some significant, unbroken stretches of wild remain protected. If you try to please everyone, you will simply destroy the remaining forests. (Individual, Olympia, WA - #A16987.70500)

**776. Public Concern: The Forest Service should not implement a national roadless rule because it will further encourage overharvest of private lands.**

The reduction in Forest Service timber sales in recent years has led to a profound imbalance in Montana's log supply equation. Inventories show that Montana as a whole has not been overcut, but rather has more timber than in 1950. However, the private industrial timberlands of Montana have been very heavily logged in recent years as mills have had to compensate for the lack of National Forest timber. Their motivation is simple, to try to avoid shutting down, losing the investment in their sawmill, and throwing their employees out of work. The data gathered for an interagency task force which was summarized in the 1993 publication "An Assessment of Montana's Timber Situation" clearly show that we will need substantial amounts of National Forest timber in the near future if Montana's forest products industry is to avoid collapse. The policy of decimating the timber sale program, through a series of moratoria, listings of species such as Bull Trout under the ESA, and initiatives such as the "lock up" of 50 million acres, will in turn decimate Montana's timber dependent communities. (Organization, Missoula, MT - #A28141.75300)

**777. Public Concern: The Forest Service should help local mills retool to maximize benefits to local economies.**

The FS should work with local communities to help them utilize any forest products that are removed so that maximum economic benefit stays in the community. (Re-tooling mills to take small diameter wood, for example.) (Individual, Carlton, WA - #A30322.75400)

**778. Public Concern: The Forest Service should consider the small number of jobs created by chip mills versus those created by conventional saw mills.**

As a large number of chip mills have moved into our area because of our reputation for poor environmental protection. With their insatiable appetite for wood, projections show that they will denude the Upstate at an unsustainable rate. And all of this havoc is wreaked while a trivial number of jobs are created by a chip mill, about 1/100 of what would be created with a conventional saw mill. (Individual, Clemson, SC - #A1455.75310)

**779. Public Concern: The Forest Service should allow resource development in roadless areas to meet the needs of American consumers.**

Given the fact that your agency has de facto control over the lands which you claim, I would like you to consider the fact that our country needs the resources which are upon the public lands in order to maintain our standard of living, and to remain a light of freedom to the entire world. If we close off all of our public lands, and do not allow the resources in them to be developed, then our nation will become poor. I do not want my children and grandchildren to grow up as the children and grandchildren of people in third world countries, where the government controls everything, and the people are homeless and poor in this our land. (Individual, Las Vegas, NV - #A1078.70300)

**780. Public Concern: The Forest Service should stop claiming that the lumber needs of American consumers justify timber removal in roadless areas.**

There are no reasons or rationale adequate to continue destroying these pristine national treasures. The selling off of these forests only benefits a few timber barons. As a citizen and a taxpayer I state emphatically that you may not use my “needs” for lumber or paper pulp as an excuse to destroy these biologically rich habitats; I WILL DO WITHOUT! (Individual, Eugene, OR - #A14374.75500)

**781. Public Concern: The Forest Service should consider the negative economic impacts of roadless protection on the economy.**

**ON THE HOMEBUILDING INDUSTRY**

There is a real concern among lumber dealers and all those in the building/housing sector about how the management, or non-management, of the US forest resources impact the ability of people to purchase a home. The laws of supply and demand dictate that whenever supply is lessened, costs rise. Each time the United States shuts down access to the forests, thereby shutting down any kind of logging or selective harvesting, it impacts the cost of lumber—and it drives the US to more dependency on foreign sources of product. Lumber is the largest single component in the building of a house and when the cost of lumber increases, the cost of the house increases. For each \$2,000 increase in the cost of a home, according to the US Census Bureau, 300,000 Americans nationwide are kicked out of eligibility for a home mortgage. This is great concern for lumber dealers because if people can’t afford homes, homes don’t get built. When homes don’t get built, lumber dealers don’t have business. (Association, Washington, DC - #A6211.75400)

I have been a great supporter of yours here in Colorado and appreciate the delay of enforcing the anti-capitalist approach of the Clinton Administration on Public Lands. At one time the public lands were a Land of Many Uses. Now, they seem to be the land of socialism. The U.S. Forest Service Roadless Rule permits our public lands to decay and additional chances of wild fires of those forests and the surrounding areas. Without Roads to set up fire blocks, we are sitting on tinder here in the west so the environmentalists/socialist agenda can be promoted. By implementing the roadless rule it will increase the cost of the homes in the United States, increase the Energy Crisis and assist in bringing down our economy. (Individual, Castle Rock, CO - #A3628.10112)

*Effects on the Agricultural and Ranching Sector*

**782. Public Concern: The Forest Service should consider the social, cultural, and historic value of the sustained use of these areas and the local communities they support.**

The current Roadless Area Conservation Rule fails to account for the social, cultural, and historic value of the sustained use of these areas and the local communities which they support. As rural communities are economically besieged by impacts from a faltering economy, increasing agricultural input costs, and the loss of public resources, our country’s valuable cultural heritage is slowly being eroded away. The economic and social value of these roadless areas to many industries, including ranching, cannot be understated, and should be taken into account in the decision making process. (Association, Sacramento, CA - #A3681.75000)

**783. Public Concern: The Forest Service should consider the negative economic impacts of roadless protection on the economy.**

**ON RANCHERS**

The roadless initiative also hurts my family in that it will make it harder on the ranchers who have permits to graze their cattle on the mountain. Not having any roads sure makes it hard to manage cattle. (Individual, Manti, UT - #A23591.75520)

**784. Public Concern: The Forest Service should address the effects of aquatic species protection on agricultural areas.**

This community has seen the worst drought in decades, although it is usually plentiful with water flowing off the Southeastern Cascades. The very recent Federal decision to shut down the "A" canal run-off of the upper Klamath Lake, that has been designated for the local farming community for decades, to supposedly spare the hardy Sucker fish and the unpredictable salmon at the mouth of the Klamath river has undoubtedly hurt the economy and the morale of the people here yet again. There has been an angry outcry to "kill the Sucker-fish" and to amend the Endangered Species Act, which was the "official" basis for the Federal decision, although there is a cynical suspicion that California's demand for more [electricity] played a role in this decision. There is a contingent here with whom almost all of the regional rural populous sympathizes with, that is on the verge of an all-out rebellion. (Individual, Klamath Falls, OR - #A6931.51200)

***Effects on the Mining, Oil, and Gas Industries*****785. Public Concern: The Forest Service should consider the negative economic impacts of roadless protection on the economy.****ON MINING-DEPENDENT COMMUNITIES**

The roadless rule prevents the mining and drilling of natural resources on public lands that has yet to be extracted, costing local governments millions of dollars. This would directly affect me in a number of ways. Higher taxes would be required with the loss of taxes collected on mining companies and other businesses forced to close due to the abovementioned actions. (Individual, Sterling, UT - #A8924.75700)

**786. Public Concern: The Forest Service should prepare an Energy Impact Statement for mining-dependent communities with inelastic economies.**

The Roadless Area Final Environmental Impact Statement clearly noted that in some areas of the country (particularly rural western states), that the economy is relatively or completely inelastic. This means that if historic mining jobs are eliminated, there won't be anything available to replace them, or they will be replaced by minimum wage jobs. Input is needed from local and county commissioners, agencies and public to determine the importance of coal mining to the region. Careful consideration should be given to those counties and communities where mining activities are critical to the economy and well being of those areas. An Energy Impact Statement would prove useful to this deliberation. (Business, Wright, WY - #A23085.75530)

The amended rule should include the President's Executive Order requiring that any federal action to incorporate lands into inventoried roadless designation must also include an Energy Impact Statement that identifies and quantifies impacts to energy resources within the area. (Business, Wright, WY - #A23085.65300)

**787. Public Concern: The new rulemaking process should reevaluate coal leasing restrictions in the West Elk Roadless Area.****DUE TO THE IMPORTANCE OF MINING TO THE REGIONAL ECONOMY**

There have been several Forest Management Plan revisions over the past 20 years, as well as several Environmental Impact Statements for such things as Oil and Gas Development in the Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG). In fact, the Oil and Gas FEIS Record of Decision stated, "The West Elk Roadless Area has been divided into two general areas, the area west of Coal Creek and the area east of Coal Creek. West of Coal Creek existing coal leases, coal exploration activities, and roads and spurs have compromised the roadless values. Standard Lease Terms will apply west of Coal Creek. East of Coal Creek, this part to the West Elk Roadless Area is of the Kebler Pass

Corridor. The decision of the Kebler Pass Corridor is No Lease . . . .” The coal mines are located in the area west of Coal Creek.

In addition, the area has experienced extensive drilling programs for coal exploration, as well as coal leasing. Delta County has been supportive of these coal mining activities, as it serves to extend the future of the economy of the region which supports so many of our residents. Little to none of this information was considered in the previous rulemaking, as the boundary was pre-determined. There was not an opportunity to discuss modifications in the boundaries, and as such the revised rule needs to provide that opportunity. Informed decision-making does not mean that every last bit of information be available, but pertinent and relevant data/information is critical. The Forest Service needs to ensure that the key information is brought to light. (Elected Official, Delta County, CO - #A15550.75530)

#### **DUE TO POTENTIAL IMPACTS ON THE WEST ELK MINE**

Development of the West Elk Mine historically has required several ventilation shafts and development of drilling activities requiring the construction of access roads over National Forest lands. In addition, last year, the Mine experienced a serious underground mine fire as a result of spontaneous combustion. Road construction was vital to locating the fire, determining its extent, and extinguishing it, thereby preserving vital natural resources, jobs, and associated federal coal royalties, state taxes, and revenue sharing to Gunnison County. Therefore, roadless designation of the area affecting the West Elk Mine would significantly impede future mine development and exploration by cutting off access to the surface necessary for safe and productive mining operations.

This problem is [not] merely hypothetical. Indeed, it is very real—because under the Roadless Rule, almost all of the West Elk Mine’s future expansion areas required for operations to continue would be designated as roadless since those expansion areas lie within inventoried roadless areas. Indeed, West Elk already has faced effects from the Roadless Rule. It sought permission to conduct exploration drilling in the future expansion area, but the Forest Service recently denied that request based upon the anticipated roadless designation of that area.

This denial by the Forest Service is particularly ironic since the Roadless Rule supposedly has not been implemented because of the preliminary injunction granted to plaintiffs on May 10, 2001 by the United States District Court for the District of Idaho in *Kootenai Tribe of Idaho et al v. Veneman*, Civil No. 01-010 (D. Id. filed Jan. 8, 2001), and *State of Idaho v. Dirk Kempthorne, Governor v. US Forest Service*, Civil No. 01-011 (D. Id. filed Jan. 9, 2001). Indeed, this very ANPR is an acknowledgement by the Forest Service that the rulemaking process resulting in the Roadless Rule was flawed and should be corrected. (Association, Washington, DC - #A19636.65320)

Unfortunately in the interim, however, Arch’s West Elk Mine has been caught up in the middle and is experiencing actual, not hypothetical, problems. Arch fears these problems are representative of only the tip of the iceberg should the Roadless Rule be fully implemented. Thus, as of the date of this filing, the West Elk Mine is in jeopardy due to the enjoined Roadless Rule. More specifically, even though the Roadless Rule is not in effect, the West Elk Mine has been unable to proceed with a recently approved BLM modification of two of the Mine’s coal leases, adding 160 acres to the 4836 acres in Lease C-1362 and just under 150 acres to the 2770 acres in Lease COC-56447. These lease modifications, which constitute less than a 3% increase in the size of the Mine are needed to adjust lease boundaries in order to avoid the bypass of economically recoverable coal and to provide for the efficient use of Mine resources and infrastructure without extensive expansion to new land areas. All of this has been explained and analyzed in the Forest Service’s Environmental Assessment (“EA”) related to the exploration license applications filed with BLM to cover activities in the acreage included in the lease modifications. Nevertheless, the Forest Service is proposing a stipulation to these lease modifications that will require the application of road building prohibitions.

Denial of Arch’s exploration license applications by the Forest Service based on the application of road building prohibitions will not only result in a waste of otherwise recoverable coal, but also raises real concerns that such restriction represents a portent of things to come—with adverse effects not only for Arch, but to our local communities as well. (Association, Washington, DC - #A19636.65320)

**788. Public Concern: The Forest Service should adequately consider impacts to the Utah coal industry.**

If implemented, the current proposed rule will jeopardize hundreds of millions of tons of Utah's known coal reserves and will threaten the very energy independence of the State of Utah. The U.S. Department of Agriculture and the U.S. Forest Service failed to adequately address the impact of the Roadless Area Rule on Utah's coal industry because of a complete lack of detailed maps during the public scoping process. As a result, the estimated 50 million tons of Utah coal identified by the Agency's final Environmental Impact Statement (FEIS) grossly understates the proposed rule's impact on Utah's dwindling coal reserves and the corresponding economic impact on local economies. (Association, Salt Lake City, UT - #A20464.75530)

**789. Public Concern: The Forest Service should allow access for mining to protect investments made by the industry.****IN NEVADA GOLD MINES**

AGNA is the majority owner and operator of the AngloGold-Meridian Jerritt Canyon Joint Venture that operates the Jerritt Canyon Mine on the Humboldt-Toiyabe National Forest in the Independence Range. The Independence Range lies northwest of Elko, Nevada, and southwest of the Jarbidge Wilderness.

Approximately eight miles north of the Jerritt Canyon Mine is the Big Springs mining area. Independence Mining Company Inc. (an indirect predecessor of AGNA) produced as much as 60,000 oz. of gold annually in the 1980s and early 1990s from Big Springs; AGNA has conducted some additional exploration activities in the area within the last year. Squeezed between the Jerritt Canyon Mine and Big Springs is an inventoried roadless area identified in the FEIS for the Roadless Rule, see FEIS, Vol. 2, at 117, where valuable mineral deposits quite likely exist and could be found if exploration remains feasible. The designation of this area as "roadless," however, will significantly impair any such mineral exploration and development because: (1) the preparation of new forest plans triggered by the proposed rule will cause significant delay; and (2) the likely necessity of conducting an EIS at substantial costs will make most exploration activities uneconomical. Indeed, the roadless designation itself creates a major new disincentive to making the substantial investments needed to carry out mineral exploration. (Association, Washington, DC - #A19636.75530)

**790. Public Concern: The Forest Service should consider negative economic impacts to the oil and gas industry.****IN NORTH DAKOTA**

This rule will have a devastating impact on the oil and gas industry of North Dakota and drastically impacts the economy and well being of the state as a whole. The current management direction of the grasslands allows multiple uses as determined at a local level by the Forest Service's Bismarck office. The Roadless Initiative would take nearly 25% of the Dakota Prairie Grasslands out of multiple use management and set it aside for amenity uses by small special interest groups. (Business, Bismarck, ND - #A19269.75530)

BP Amoco has put their Mandan refinery up for sale. This was announced the same week the Final EIS for the Roadless Plan was released. Why would a company do this when the lack of refinery capacity is one of the main contributors to the current oil shortage? It is my understanding that the Mandan Refinery has had difficulty in obtaining sufficient oil to operate at optimum capacity. It also obtains approximately 36% of its volume from wells located on the National Grasslands. I do not believe that if they felt assured of adequate oil supplies that they would have put the refinery up for sale. (Elected Official, McKenzie County, ND - #A27737.65300)

**791. Public Concern: The Forest Service should consider negative economic impacts to the phosphate mining industry.**

The proposed ANPR poses serious threats to our company's ability to continue providing critical phosphate soil nutrients to America's farmers. (Association, Pocatello, ID - #A20842.75530)

**792. Public Concern: The Forest Service should abandon the Roadless Area Conservation Rule.**

**DUE TO NEGATIVE ECONOMIC IMPACTS TO THE HARDROCK MINING INDUSTRY**

The USFS proposal would adversely affect NWMA members economically, spiritually, and emotionally. A significant number of our members have made substantial investments in mineral related activities occurring within the National Forest System. Their future business interests are directly and irreparable harmed by the January 12 Rule, as needed access is prevented. (Association, Spokane, WA - #A17351.75530)

**793. Public Concern: The Forest Service should consider the conclusions of the National Academy of Sciences report on hardrock mining.**

These letters refer to an October 1999 report entitled "Hardrock Mining on Federal Lands," prepared by a balanced, blue ribbon panel of experts under the auspices of the National Academy of Sciences/National Research Council, pursuant to a request by Congress (the "NRC Report"). That Report specifically found, as an overarching conclusion, that existing federal and state regulation of hardrock mining on Federal lands (including National Forest lands) was "generally effective" and that "improvements in the implementation of existing regulations present the greatest opportunity for improving environmental protection and the efficiency of the regulatory process. (Association, Washington, DC- #A19636.75530)

**794. Public Concern: The Forest Service should refute the allegation that coal mining results in higher road costs to the Agency.**

**BECAUSE INDUSTRY RECLAMATION BONDS FINANCE MAINTENANCE**

Clearly note that surface disturbances associated with coal mining (i.e., road construction and reconstruction) to the Forest Service. Federal and State rules, regulations and statutes require that the operator reclaim the disturbance to a condition at least as good as the pre-mining land condition and that it be done at the operator's expense. A reclamation bond is held by the State until such time as the reclamation is deemed satisfactory (usually 10 years after completion of the finalization of the reclamation). The Forest Service needs to refute the allegation that coal production is creating road maintenance costs for the Forest Service. (Business, Wright, WY - #A23085.75600)

The Forest Service has a unique relationship with coal mining on Forest Service lands in that there are state and federal requirements to reclaim any surface disturbance associated with mining activities to a condition that is at least as good as the pre-mining land condition. **Coal mining activities cannot by definition result in the need for the Forest Service to expand any further dollars for maintenance of roads, as it is the responsibility of the operator to reclaim those disturbed areas to the satisfaction of the landowners.** The amended rule should clearly and distinctly recognize this fact. (Business, Wright, WY - #A23085.65320)

**795. Public Concern: The Forest Service should discourage boom and bust oil and gas development.**

Depopulation in North Dakota's western counties is a longstanding circumstance. The economics of oil development in western North Dakota, only a small part of which is dependent on the National Grasslands, causes boom or bust scenarios in local communities. In 1999, on the other hand, twenty-eight percent of North Dakota's primary sector economy was attributed to our most active growth

industry—tourism. Guide services, food and sleeping accommodations, outfitters, educational and entertainment opportunities, and related retail sales and services give local citizens options for livelihoods alongside historic ranching traditions. (Organization, Bismarck, ND - #A19108.75530)

**796. Public Concern: The Forest Service should reiterate that a national roadless rule will not impact the nation's energy supplies.**

Roadless area in the Rocky Mountains are not a major domestic source of oil and gas. These areas contain only 0.04% of the nation's oil and resources and 0.06% of U.S. gas resources. Protecting roadless areas will not impact the nation's energy supplies. (Individual, Laramie, WY - #A22540.75530)

Roadless areas in the Rocky Mountains contain only four-tenths of one percent of the nation's oil resources and six-tenths of one percent of U.S. gas resources. In fact, these wild forests are worth more standing. (Organization, Portland, OR - #A12004.75500)

Most roadless areas have been available for oil and gas leasing for decades, but few have been leased. Extensive portions of the lands which the oil and gas industry believes have high potential are already under lease and therefore would not be affected by the Roadless Rule. Specifically, according to the Forest Service, 759,000 acres of national forest roadless areas with high oil and gas potential—mostly located within the Intermountain, Northern, and Rocky Mountain regions—are already under lease. The Roadless Rule would have no effect on these existing oil and gas leases and, in fact, provides for future development, with roadbuilding, on lands currently under lease. For this reason, claims of the Rule's impact are usually overestimated. (Organization, Denver, CO - #A21367.75530)

### *Effects on the Recreation Sector*

**797. Public Concern: The Forest Service should consider the economic benefits of roadless protection to state and local economies.**

**DUE TO THEIR IMPORTANCE TO THE TOURISM INDUSTRY**

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. (Organization, Plymouth, MN - #A7116.75000)

My family business has depended on roadless wilderness areas for more than 80 years. For this business to survive another generation or two we must have wilderness. We have already been impacted by logging and developments. Please, no more roads in the little that remains. (Individual, No Address - #A8149.75310)

My business employs 30 people directly related to the Boundary Waters Wilderness activity and the last thing my customers want to hear is the roar of road building and logging. Keep the Roadless Rule intact. (Business, Ely, MN - #A6610.75320)

We are grandchildren of a dude ranching family legacy. For the legacy to continue to us and our children we need to not change the Roadless Area Conservation Rule. Please keep it JUST AS IT IS. The guests that have come here for over 80 years want wilderness w/o roads. As an appointed official of our national forests you are representing us as owners of government lands. Please heed our wishes. (Individual, No Address - #A8151.75540)

We live in Bristol, VT and use the Green Mountain, Pisgah and other National Forests in the East, as well as some in the West, as owners of Wonder Walks, a permitted tour company that leads guided outings. We also hike, snowshoe, cross-country ski, and use the forest for enjoyment on our own. So, naturally, maintaining the ecological integrity of the forest is of utmost importance to us and our business. (Business, Bristol, VT - #A8734.75540)

Many of my constituents have contacted me in support of this measure. They believe it is important for both our surrounding Six Rivers Forest ecosystem and our local economy. Currently, our economy is becoming more balanced with the attributes of ecotourism, coupled with logging on other Forest Service Lands. (Elected Official, Humboldt County, CA - #A22067.75540)

It has been said many times that folks do not come to the mountains or the forests to see clear cuts, logging, or roads. The Southern Appalachian National Forests, in particular, are within one day's driving distance of half the nation's population, and are under increasing pressure from recreation and tourism. Wilderness areas in some places, particularly closer to these large urban centers, are facing overuse, while at the same time the existing roadless inventory is being whittled away by so-called "local" management into smaller and smaller parcels by roadbuilding and logging. In the end, such industries leave local communities with nothing but denuded hillsides or "beauty strips", and the departure of the loggers leave a tourism industry in shambles. (Organization, Bland, VA - #A17007.75540)

#### **DUE TO THEIR IMPORTANCE TO RECREATIONAL NON-MOTORIZED USERS**

This past summer, I spent 22 days backpacking in roadless areas out West. With the purchase of some new gear, airfare, and the use of guides, the economies of several cities benefited by having roadless areas close by. That dollar amount is multiplied many times over, and having a roadless area to attract people such as myself and others who benefit from roadless areas use, it is a continuing source of revenue for communities. (Individual, Plymouth Meeting, PA - #A8071.45100)

#### **DUE TO THEIR IMPORTANCE TO THE MOUNTAIN BIKING COMMUNITY**

Mountain biking is one of the most popular recreational uses on the TNF, by virtue of its affordability, popularity among all age groups, and accessibility to miles of trails from large Northern California population centers. The tourism associated with mountain biking on this Forest is significant to the small towns in the area, particularly Downieville, California, in the heart of the Forest, as well as the Lake Tahoe/Truckee area. Much of the social fabric of the Forest on summer weekends is strongly influenced by mountain biking activities. (Organization, Boulder, CO - #A17252.75540)

Due to popularity among all age groups, the accessibility of Tahoe NF trails from urban centers and large number of riding areas in the TNF, mountain bikers provide communities such as Downieville, Sierra City, and other smaller towns assistance from the money spent by mountain bike visitors. Larger areas such as the Truckee/Tahoe Lake area also benefit for the same reasons. Social functions within these communities celebrate mountain biking and the contributions of cyclists. (Individual, Woodland, CA - #A18071.75500)

#### **DUE TO THEIR IMPORTANCE TO RECREATIONAL FISHING AND HUNTING**

Fishing and hunting values and traditions are deeply held in the United States and must be considered in decisions that affect the roadless areas in the forests and grasslands—the nation's best remaining fish and wildlife habitat. The Forest Service should also consider the huge economic benefits roadless areas bring to state and local economies. A 1999 report by the American Sportfishing Association found that in 1996 alone, fishing in the National Forests contributed \$8.5 billion to the nation's economy. Keeping roadless areas in our national forests and grasslands roadless, will help to sustain these economic benefits. (Individual, Beverly Hills, MI - #A4756.75000)

The Forest Service should also consider the huge economic benefits roadless areas bring to state and local economies. A 1999 report by the American Sportfishing Association found that in 1996 alone, fishing in the National Forests contributed \$8.5 billion to the nation's economy. Keeping roadless areas

in our national forests and grasslands roadless will help to sustain these economic benefits. Regarding allowable activities in roadless areas, roads should not be constructed in the existing roadless areas of our national forests and grasslands. These roads threaten vital trout and salmon habitat by increasing sediment in streams - sediment that fills pools and smothers spawning gravel. (Individual, Minneapolis, MN - #A5301.75500)

Remember take away the animals and fish and we have no reason to buy a license, so you won't have any money for paying for wardens, etc. (Individual, Campbellsport, WI - #A3971.53300)

#### **DUE TO THEIR IMPORTANCE TO PHOTOGRAPHY-RELATED BUSINESSES**

Today I primarily make my living shooting wilderness landscape photographs here in Colorado. Colorado's roadless areas are the heart and soul of my business. This is not a simple-minded issue of jobs versus the environment. Preserving all of Colorado's remaining wild areas is essential for me to continue my career. (Individual, Boulder, CO - #A13461.75320)

#### **DUE TO THEIR IMPORTANCE TO OUTFITTER-GUIDES**

Inventoried roadless areas are critical to small outfitting and guide businesses permitted to operate on national forests throughout Montana. Inventoried roadless areas provide approximately half of all service days, more than designated wilderness. 235 wildlands outfitters (77% of all wildlands outfitters) depended on unprotected roadless areas for a significant portion of their business. For those wildlands outfitters, that depended on unprotected roadless areas for a portion of their business, sixty percent of their service days occurred in roadless areas. Only twenty-three percent of Montana wildlands outfitters utilized designated wilderness but no inventoried roadless areas. Thirty percent of wildlands outfitters depend on unprotected roadless areas to provide a "wild" experience. \$83 million in economic activity and 3,339 Montana jobs stem from businesses who operate in Montana's inventoried roadless areas. (Business, Bozeman, MT - #A21902.75320)

#### **DUE TO THEIR IMPORTANCE TO THE OUTDOOR GEAR INDUSTRY**

REI is a major specialty retailer of outdoor gear and clothing. Our projected sales for 2001 will exceed \$700 million, making us a significant part of the \$18 billion outdoor industry. As the nation's largest consumer cooperative we have more than 1.8 million members actively purchasing annually nationwide. . . . REI members and our 7,000 employees are passionate outdoors people and active stewards of our outdoors. Our research indicates that protection of Wilderness and pristine outdoor places for recreation is overwhelming favored by our members and employees. As a company, we've worked for more than 25 years with the outdoor industry, land managers, outdoor groups and the conservation community to ensure our members can enjoy a diversity of outdoor experiences. Forest Service lands are significant and vital to ensuring this experience.

The roadless policy is important to our business because it would have preserved 58.5 million acres of land for the 137 million Americans who last year participated in human-powered outdoor recreational activities. It also recognized that the real growth in use of public lands is in recreation. (Business, Sumner, WA - #A21731.75540)

From the muscle-powered recreation standpoint, roadless areas offer a unique and pristine outdoor experience where one can experience nature in its original state and with minimal intrusion from the outside world. These opportunities are dwindling and the REI's business is critically linked to successfully ensuring a diversity of outdoor experiences on these lands. These lands are increasingly important as urban growth continues and close-to-home recreation areas are more and more frequently surrounded by intensive development. In the long-term, these roadless areas will be in greater demand by people who want a more primitive outdoor experience. A lack of availability of such outdoor experiences will affect the future growth and success of outdoor companies such as REI, as well as manufacturers, outfitters, travel companies and the recreation-dependent communities adjacent to the resource areas. (Business, Sumner, WA - #A21731.75540)

As an employee of Tent and Trails located in New York, permanently protecting roadless areas in America's National Forests is vital to the sustainability of the \$18 billion outdoor industry that supports more than one million jobs—including mine. (Individual, New York, NY - #A27278.75540)

**798. Public Concern: The Forest Service should refute the claim that roadless area protection will harm recreation-dependent communities due to loss of visitors.**

Some opponents of the RACR claim that roadless area protection will diminish recreation opportunities on public lands, undermining the progress many rural communities have made in diversifying their economies. Potential conflict between roadless area protection and recreation has become one of the most prominent and contentious issues in the debate over public lands. Contrary to anti-roadless area propaganda, the amount of recreation on a given National Forest does not decline when a forest has a higher percentage of protected lands. When combined with the understanding that wilderness and recreation in primitive areas is an opportunity unique to the public lands system—one that cannot be replaced once it is gone—and combined with the host of other economic and community benefits wilderness provides outside the direct sector of revenue generated from recreation, further protection is clearly a prudent measure to take for our public lands. (Organization, Portland, OR - #A12004.75540)

**799. Public Concern: The Forest Service should protect big game habitat.**

**DUE TO THE CONTRIBUTION OF HUNTING TO THE LOCAL ECONOMY**

Southwest Colorado's economy receives a large boost every Fall from an influx of hunters. The thriving elk herds sought by these hunters rely on the security and solitude of national forest roadless areas during spring calving and rearing seasons. This is another important way in which the Roadless Rule will protect and enhance our local economy, by protecting the habitat that sustains our big game herds. (Individual, Durango, CO - #A11655.53100)

**800. Public Concern: The Forest Service should consider the negative economic impacts of roadless protection on the economy.**

**ON THE RECREATION-DEPENDENT TOURISM INDUSTRY**

I think recreation has a considerable economic impact and the stifling of recreation would lead to a corresponding stifling of our economy. (Individual, Palmer Lake, CO - #A23361.75540)

There is the issue of road access for recreational purposes. Outdoor recreational activities such as camping, hiking, horseback riding, fishing, hunting, bird watching and other wildlife observation are an important economic value to our area. We need good roads. (Association, Port Angeles, WA - #A17190.75540)

In past years, we have seen the impact of severe wildfires upon many communities in the United States. Burnt forests have a negative impact upon the General Public when they visit affected areas. Very little tourist activity occurs in the midst of a fire—and the resultant impact to the very area people are coming to visit may have a negative effect for several years beyond that of the fire. As many communities have become reliant upon tourism as a substitute and/or replacement for other Forest uses that provided the foundation for their communities and social structure, these same communities are extremely vulnerable to any impact on their ability to maintain jobs, and directly to provide and sustain the services and facilities required to maintain the viability of the community. I have spent time in communities that have been devastated by changing rules and laws—in many cases leaving the inhabitants with no choice other than to leave, in order to provide for their families. A healthy forest also includes its human inhabitants! (Business, Juneau, AK - #A30599.30130)

**ON SKI AREA-DEPENDENT COMMUNITIES**

The economic and social impact of a ski area closure will be detrimental for Taos and Mora counties whose already high unemployment rates are among the highest in the nation. Sipapu is the largest private employer in Southern Taos County and employs about 70 full and part-time citizens in the winter and about 25 in the summer. (Permit Holder, Vadito, NM - #A20142.75310)

Sipapu was begun by the Bolander family in 1952. Today the resort remains a small family ski area. The Roadless Initiative is a broad action, which has benefits for certain areas of public lands. However, it will be detrimental to this small family ski area and the communities surrounding it. Over the past 50 years the Bolanders have invested significant funds, including a half million-dollar state-of-the-art waste treatment plant with enough capacity for the expansion of the ski area. If the forest plan had not designated this area for ski area expansion the family would not have invested their life savings in Sipapu Ski Area. **We are asking for your help in insuring the viability and continuance of this valuable community resource in Northern New Mexico.** (Permit Holder, Vadito, NM - #A20142.75320)

**ON THE MOTORIZED RECREATION-DEPENDENT TOURISM INDUSTRY**

Some for this law say that it would boost the tourist trade. I can't see how this is possible. The truth of the matter is they come to Utah because of the easy access to our mountains. Take for example the ATV Jamboree, ground zero for this event is Richfield, Utah my home town. This single event attracts people from all over the world. I've personally met people from far away as Russia that have come to ride four-wheelers in our mountains. It is a huge event, the only other event that coming to ride and hunt there would significantly drop. Without the tourist brought in for these events the business driven by them would go under. Greatly hurting the local economy. (Individual, Richfield, UT - #A12640.75540)

**801. Public Concern: The Forest Service should exempt the proposed Pelican Butte ski area from the Roadless Area Conservation Rule.****TO HELP REVIVE THE DEPRESSED LOCAL ECONOMY**

Klamath County is in a crisis. My hope for this community, as is the hope of many of the long-time residents here, is that there could be economic diversification away from a resource-based economy (i.e. lumber) towards non-resource-based economy in order to smooth out the economy here while avoiding environmentally adverse industries. The Jeld-Wen Corporation's \$4,000,000 commitment to develop Pelican Butte, one of 51 peaks in this county, into the most environmentally conscientious ski-destination in the country was one of this community's isolated hopes of pulling it out of the economic doldrums just prior to the proposed "Roadless ban." This \$4,000,000 commitment has largely gone into the single most extensive environmental impact study in the history of skiing in this country. If the "Roadless ban" is assumed to the degree that Mr. Clinton proposed without any real local input whatsoever, then there is no hope for such a ski-development. Although the 3,000 acres that was proposed to be set aside for this project represents only 1/10,000th or 0.01% of the total Clinton "Roadless ban" area and although it would only have the capacity of 12% of the Vail ski-area before its recent expansion, this ski-destination would have a decidedly positive impact here, and hence, there has been a 70% local approval of such a project. Not only would it provide employment for the local community, but it would entice environmentally clean industries to develop branches here, thus affording the technical graduates of the Oregon Institute of Technology, 97% of whom currently leave the county for metropolitan areas, local employment. (Individual, Klamath Falls, OR - #A6931.75100)

**802. Public Concern: The Forest Service should not reduce trail access to recreational horse riders.****BECAUSE THIS USER GROUP HAS A SIGNIFICANT IMPACT ON THE U.S. ECONOMY**

Recreation use of the horse is the fastest growing segment of the horse industry and plays a major role in the United States economy. With an economic impact of more than \$28.3 billion, recreational riding supports 316,900 full-time jobs and involves more than 2.9 million individuals. Any action by the

federal government that could affect the opportunities of recreational riders to ride their horses on trails or public lands would have major influence on the viability of this very important industry. (Organization, Washington, DC - #A23320.75540)

## *Effects on Employment*

### **803. Public Concern: The Forest Service should protect roadless areas.**

#### **TO CONTRIBUTE TO THE HEALTH AND DIVERSIFICATION OF LOCAL ECONOMIES**

Critics of roadless area conservation contend protecting public lands will adversely affect economic growth. But evidence strongly shows that economic vitality and conservation of wild forests are not mutually exclusive. In fact, the economic health of rural communities that contain a large portion of federal land is actually ENHANCED by wildlands protection. For example, extractive industries no longer drive the economic engines of rural California. High tech business, tourism, recreation, and outside investments have helped diversify local economies in the Sierra Nevada, replacing the boom and bust cycles of unsustainable extractive industries. As a result, Sierra Nevada, once dependent upon activities like logging and mining, are thriving in large part because of the unique quality of life attributes public lands provide . . . (Organization, Missoula, MT - #A17234.75540)

Another problem we are facing across the nation is that unstable unsustainable economies have been developed, such as subsidized logging in the Tongass, and irrigated farming in the arid West, and these economies simply can't be maintained forever under increasing and competing resource demands. The Forest Service must work in concert with other agencies to phase out these economies. People must understand the limitations, must see the transition coming, and hopefully have some job retraining or other opportunities to help weather the transition. Honestly is an important element here.

When timber planners in the Tongass experienced falldown (the gap between timber predicted, and timber available on the ground), they deferred the problem to the future by expanding and shifting unit boundaries. This was illegal, kept the timber industry functioning at inflated levels, and caused greater hardships to rural communities, when those future timber sales had no real timber supply on the ground. You can't promise everything to everyone. Ultimately, people can recognize and respect the idea that the more people wanting a slice of the pie, the smaller the pieces have to be. The Forest Service has to be honest about the amount of resources that are available, and the limits of exploitation of those resources. (Individual, Sitka, AK - #A15506.75610)

Nor am I willing to put our forests at the mercy of politicians such as Montana Governor Judy Martz, Idaho Governor Dirk Kempthorne, or any of our Western congressional delegations and state legislature who, instead of seeking to diversify and modernize our economies, resort to anti-environmentalist demagoguery while continuing to over-emphasize the failed natural resource economy that has left my state, Montana, with the poorest performing economy in the nation. (Individual, Bozeman, MT - #A27944.12240)

#### **TO ENCOURAGE EXTRACTIVE INDUSTRIES TO REPLACE UNSUSTAINABLE BUSINESS PRACTICES WITH SUSTAINABLE ONES**

What viable business would deplete the very resources it needs for survival? The timber industry, the mining industry, the off road vehicle industry, and the petroleum industry. These industries need to find sustainable ways to create and use the products they sell. If industry cannot do this with the 380,000 miles of existing forest roads, their business is in need of some serious re-evaluation of the methods they use. If these industries cannot make this change, more sustainable industry will rise up and replace their biologically destructive products. WE need to protect all of our public lands that remain even remotely intact. The survival of the environment that sustains all life is in serious question. PROTECT ALL OF OUR NATIONS REMAINING AREAS OF ROADLESSNESS! Logging, mining, and road building interests must be held responsible for the impacts they have put on the US population's land. (Individual, Carbondale, CO - #A17312.75400)

**804. Public Concern: The Forest Service should consider the effects of timber export on employment.**

Too much of the harvested crop [logging on national forest] is shipped abroad and not used to provide additional jobs for Americans. (Individual, Williston, TN - #A1394.75310)

**805. Public Concern: The Forest Service should consider the effects of timber import from low-wage countries on domestic employment.**

Because of globalization these local mills are facing competition from cheap wood products made in low wage Asian, Mexican, South and Central American and African countries. Our local mills for that reason are not doing well. Flooding the market with more and more wood would be insane. (Individual, Klamath Falls, OR - #A2537.75950)

**806. Public Concern: The Forest Service should act to preserve local jobs by keeping roadless areas available for timber removal.**

I am writing to say open the roadless areas, and let the people that will still work for a living, have a job. I live next to the Bankhead Wilderness area, and it's a shame to even ride through it and see all the rotten and fallen trees, that someone could have used. The jobs that it would have created, and the money the schools lost out on is laying on the ground doing no one any good. (Individual, Double Springs, AL - #A120.75310)

As an employer of over 50 people I would like to express my concerns regarding the ROADLESS issues in our National Forests. The working families that we employ as a company depend totally on the forests of the United States for their livelihood. This includes the National Forests as well as private lands. Our products depend heavily on both the White Mountains National Forest in New Hampshire as well as the Monongahela National Forest in West Virginia. Any laws established to restrict the multiple use of these or any other National Forests are a direct threat to the people who's lives depend on the resource. (Association, Kingston, NH - #A21599.75300)

The USFS has been completely insensitive to the local people who use and enjoy these public lands. They have demonstrated their insensitivity in past decisions. There have been no tears shed by the environmentalists or bureaucrats for the folks who have lost their jobs and livelihoods over the past few years as a result of the decisions made by the USFS. I wonder how environmentally militant they would be if the decisions they made eliminated their own jobs. (Individual, Stayton, OR - #A1042.75310)

Satterwhite Log Homes in Gunnison, UT has a contract to log the Manti LaSal National Forest. This has a great economic impact on the community. The jobs offered by the sawmill are very beneficial. They employ 51 people along with 60 loggers who are from the surrounding areas. The lumber contributes to area farmers and ranchers allowing them to make improvements on their corrals, barns, fences, as well as other uses. The community uses the lumber for the construction of houses and fences. Lumber scraps are used for firewood. Being able to log in the Manti La Sal National Forest is very important to the Gunnison community and the surrounding areas. (Individual, Manti, UT - #A20336.75510)

**807. Public Concern: The Forest Service should act to preserve high-paying local jobs.****BY KEEPING ROADLESS AREAS ACCESSIBLE TO MINING**

It is well known that development of hardrock minerals creates new wealth, which is distributed throughout the U.S. economy and society. . . . Mining on USFS administered lands also provides the Nation's highest paid non-supervisory wage jobs. These jobs are one of the cornerstones of diversified rural economies in many parts of the West. They also are the foundation for the creation of many non-mining service and support businesses found in or near National Forests. (Mining Industry/Association, Spokane, WA - #A17351.75530)

**808. Public Concern: The Forest Service should consider that low-wage recreation-based jobs are no substitute for commodity-based high-wage ones.**

Despite inflated claims to the contrary, recreation related jobs and industries are no replacement for the resource-based economies which have been devastated by decades of the protectionism advocated by self-declared environmentalists. Although through hard work and good fortune, I was able to attend law school and establish a successful career as an attorney following the decline of the timber industry in the early 1980s, many of my contemporaries continue to suffer from the economic deprivation caused by the closure of national forests to true multiple use management. Recreational industries simply do not provide family wage employment. (Individual, Portland, OR - #A7955.75310)

The Tongass has been managed over the past five to ten years with regard for only agenda put forward by the environmental industry. This has resulted in an erosion of the lands available for development and maintenance of an economic base. The Tongass timber program was established in the 1950s to create an economic base that provided year round employment for the citizens of SE Alaska. By following the agenda of the environmental industry, SE Alaska has returned to an economy based on seasonal employment. The tourist industry provides only 3-4 months of work per season. The timber industry has been reduced to the point that there remains only about 100-150 year round jobs out of the 3,000 that existed when the land base was large enough to provide the raw material for a substantial forest products industry. The fishing industry is and always has been seasonal with a large portion of the fleet coming in for the fishing season only and therefore limiting the contribution to the economy. This therefore has reduced the wealth producing ability of the area, and leaves only the wealth draining public sector jobs. (Individual, Wrangell, AK - #A2360.75500)

Timber jobs have always made this valley thrive. The people here are now working 2 or 3 jobs still they make less money than one job in a mill. They have no benefits, or retirement. I know many people with kids that have multiple jobs and can't even pay their heat bill. (Individual, Kalispell, MT - #A17704.75310)

**809. Public Concern: The Forest Service should provide assistance in diversifying local rural economies.**

Local interest can be extremely biased when it comes to the use of these public forests. We don't like to change and oftentimes diverse local economic opportunities are hard to foster, leaving past experience as the only way. Helping our communities diversify our economies should be the main priority. (Individual, No Address - #A17946.75100)

**810. Public Concern: The Forest Service should provide career assistance.****RETRAIN FOREST WORKERS**

I am astonished at the number of "trophy" homes being constructed, often as second homes, in Montana, in locations that provide a favorable environment and view. These are often adjacent to national parks, forests, wilderness areas and preserves. As in the past, Montana's forest workers may need to relocate, retrain, and learn new skills. Businesses are relocating in Montana because of our stable workforce and quality of life. If anything, our forest workers need help to acquire new skills. I recall an equivalent period when thousands of displaced aerospace industry workers were retrained with federal subsidy - many becoming career Forest Service personnel. (Individual, Lolo, MT - #A111.17300)

Ex-loggers can retrain and start new lives. (Individual, Bozeman, MT - #A284.75310)

If the logging industry gets their way, all our trees will be gone. Surely, our wonderful forests are too great an asset to just sacrifice them for some temporary jobs. Let's find something else for the loggers to do. Let's give them training for new and different jobs. Let's not destroy this beautiful land of ours. (Individual, No Address - #A623.75310)

Local communities and profit-making ventures that rely on the taking of resources from public land (logging, wildlife grazing, mining, the off-road industry) must be “weaned” off their dependence on government subsidies. Other government programs, focusing on education and training must be developed to help these entities toward viable economic independence. (Individual, Portola, CA - #A695.75000)

#### **PROVIDE RESTORATION-RELATED CAREER OPPORTUNITIES TO DISPLACED TIMBER AND MINING WORKERS**

Any timber-or mining-related jobs that may be lost through these conservation measures should be replaced by jobs that will tend to SUPPORT environmental preservation and restoration. This is something we owe to all hard-working Americans, their families, and their progeny, for many generations to come. (Individual, Bradford, NH - #A5980.75300)

We believe that ecological integrity must never be sacrificed on the altar of private economic convenience. This is not to be construed as a dismissal of the problems of workers whose employment may be jeopardized by implementation of the final Rule. The ecological abuses—that were permitted from the late 1940s to the late 1980s—have resulted in forest conditions (fuel accumulations, watershed degradation, noxious weed invasions, etc.) that demand restoration activities. These activities as well as implementation of the ‘Cohesive Strategy’—can provide many opportunities for employment of those workers whose jobs are jeopardized by the roadless area protections. (Organization, Mariposa, CA - #A23321.75310)

One excellent role for local communities who may lose logging jobs is to replace these jobs with restoration, such as thinning of unnaturally crowded ponderosa pine and Sequoia forests and conducting restorative controlled burns. These activities are needed over a vast area of ponderosa pine and ponderosa pine/Douglas fir forests and could help to sustain local communities/replace logging jobs for years to come. I have traveled a large enough area of our National Forest system to know that this is a tremendous task that has the potential to provide thousands of jobs for years to come. (Individual, Davis, CA - #A30523.75310)

The good news, particularly for those protesters at that wake-like rally, is that there can be better economic times ahead for them and their families; better times doing the work they want to do—outside, in the forest, working with their hands and equipment, operating around the trees and on the old mining properties. This time of environmental consideration can mean jobs, both old and new, and a lot more of them at wages and benefits matching and likely exceeding what they are earning today—after all, these workers have a long tradition of organizing themselves into unions.

First, however, we all need to recognize that the war is over. Industry should sue for peace. An armistice must be declared, hostilities suspended and environmentalists must come to the table.

Then the old adversaries can sit together, retool our natural resource economy, save many of our small towns and the fine people who live in them.

We can do it by protecting some of the old jobs and creating many new jobs in the land. Let’s use the muscle and genius of our best loggers and loaders, mill workers and miners in restoring the land. Let’s reclaim and renew and reforest. There are thousands of jobs and profits aplenty in all rational effort of environmental conversion. (Individual, Polson, MT - #A30763.75310)

#### **PROVIDE CAREER OPPORTUNITIES TO ENVIRONMENTALISTS**

I am aware of animosity between recreational users of the White Mountain National Forest (WMNF) and the Forest Service. I believe that both should be regarded as environmental concerns and that the WMNF should provide career jobs to environmentalists. A job with the Forest Service should be regarded as highly as a job with the AMC or other environmental organizations. (Individual, Birmingham, AL - #A1111.16000)

### 811. Public Concern: The Forest Service should recognize that its management decisions are not responsible for local timber-related job losses.

The [FS] has to recognize that most of these mills are doomed for reasons much more complicated than lack of timber from the [FS]. Our western small mill economy has been nothing more than a government welfare program for years now—The Flathead is the only forest in my recent memory to have shown timber sales operated in the black. The [FS] has to drop the line that deficit sales are justified because they save 35 jobs in Darby—Wal-Mart, Costco, and Home Depot all have more to do with the eventual failure of these mills, and the people working in those mills shop in all these stores! (Individual, Missoula, MT - #A5.75310)

The National Forests are not intended to be welfare for a dying timber industry or timber-dependent communities. And yet, in many cases, these are the reasons given for harvesting timber. In a recent newspaper article, Jerry Ingersoll, the district ranger overseeing lands around Ketchikan, Alaska, said of the proposed timber sale on Gravina Island, “Recognizing that the point is not to add money to the federal treasury,” Ingersoll said, “we’re managing timber to provide jobs for the local economy. That is the purpose of this program.” But I counter that providing jobs for Ketchikan, Alaska, is not the point. The Forest Service isn’t responsible for holding together and ensuring the solvency of the local economy. I don’t want my tax dollars used to keep Ketchikan, Alaska, fiscally afloat at the expense of the forests of Gravina Island.

The decline of the local economy, loss of jobs, homeless people, etc. are all blamed on disallowing timber harvest. These could all be blamed on poor economic planning as well, perhaps more appropriately.

We don’t compensate day traders when they’ve invested poorly and go broke, but we should compensate foresters when they’ve over-logged their forests to the point that they can no longer bear the burden of another cut? This sounds merely like a poorly managed investment, and this is how it should be treated. The National Forests are for the Nation and any justification to treat local communities disparately because they have inappropriately invested in a risky business, the timber business, is an invalid use. We have enough timber to harvest in the already roaded areas. Let’s just use those and leave the rest without roads. (Individual, No Address - #A29243.75600)

Although public perception assumes that in order to have greater environmental protections, we must lose jobs, declines in employment in the timber industry are not directly linked to tougher environmental regulations. Increases in mechanization and over-cutting are the primary causes leading to mill closures and decreased employment in the field. Technological advances in the timber industry in Oregon, for example, cost about 13,800 jobs from 1980 to 1988, even as output continued to increase by almost 20%. [Oregon State Department of Employment, 1996.] *By its own nature*, industrial logging (though not necessarily selective, sustainable logging) of our national forest is an economic paradigm that is—by way of the diminishing returns principle—on the way out. The fact of this presupposes and supercedes any circumstantial contentions made by timber barons or conservationists alike, for the situation writ large is one of an industry that in this typical *modus operandi* has grossly surpassed its means—effectively putting *itself* out of business (while notably, the great potential for job opportunities in ecological restoration work remains largely unrecognized.) (Individual, Bozeman, MT - #A23574.75510)

Enough is enough! Public lands are just that! The day of the Federal Land Giveaway should now be over! As a nation, we are punch drunk on growth! It is time we sobered up! Return the land to the people, just the way it is, and let those whose incomes are bloated by Federal Land Bargains go find another way to add to their already obscene fortunes. And when you remind me about “jobs”, let me remind you that those jobs were artificially created by those who really profit from these land grabs, and those people who will “lose” jobs will find more, and find jobs more in tune with the land. No, I don’t think this is an easy decision, and that is the first indication it is the right one. (Individual, Redmond, WA - #A1249.75310)

The economic impacts of a scientifically-based roadless area policy to the timber industry and industry jobs would be negligible: “In particular, concerns recently have been expressed regarding potential job loss associated with protection of roadless areas covered under the spotted owl conservation plan (within which some timber harvesting is permitted under Option 9). The probable sale quantities of timber within these areas, however, represent only a very small share of total timber production within the region, and thus cannot be expected to have a substantial impact on industry employment or earnings, or on timber prices. [This] should be kept in mind as your administration considers the inclusion of these lands in your roadless area initiative. The employment, income, and price impacts of protecting these areas are likely to be extremely small in percentage terms” (Whitelaw et al. 1998). (Organization, Missoula, MT - #A17234.75510)

It is not true that the forest products industry is dying because it is denied access to the roadless remnant. The mill owners we know blame their economic woes on a flood of subsidized Canadian lumber imports and on high stumpage rates. We don't know what the solution to Canadian lumber imports is, but there must be one at the international level. The solution to high stumpage rates is not for Ranger districts to charge less. Nothing would be solved by stumping the last of what's left. We do not believe that our state's economy is dependent on roading and logging the last 6 million acres. If a road hasn't been punched through an area by the last of the 20th century, it is probably because there was no economic incentive to do so. The best economic draw we have is a relatively clean environment, enhanced with natural roadless areas. We can't have it both ways. (Individual, Helena, MT -#A5666.75000)

#### **AUTOMATION AND THE TIMBER INDUSTRY ARE TO BLAME**

Another excuse put forth by the timber industry is the claim that because of environmental restrictions, local economies are suffering. Nothing is further from the truth. Many logging communities have suffered not because of environmental concerns, but because they simply have used up a limited resource.

I strongly advise you to visit the Olympic Peninsula, and see what the timber industry has done to the forests there. That has been akin to an arboreal massacre, and the local communities there are suffering as well as the forests.

Timber industry jobs have disappeared not because of environmental extremism, but because of automation in the timber industry itself, not to mention greed. Where at one time cut logs were milled near the forests from which they were culled, now they are shipped overseas to take advantage of cheaper labor. That hardly strikes me as being sympathetic to the needs of local forest communities. (Individual, Seattle, WA - #A26997.75510)

#### **812. Public Concern: The Forest Service should consider that raw log exports lead to domestic job losses in manufacturing.**

I would request that you check where the timber is supposed to end up. I think you will find that most of it is exported to the orient (especially China) where it is manufactured into cheap fiberboard furniture which is then shipped back to us, thus destroying US manufacturing jobs in the furniture industry. There can just be no rational justification for this. (Individual, Belleville, IL - #A23614.75510)

#### **813. Public Concern: The Forest Service should not attempt to protect timber jobs.**

The most significant consideration should be the conservation and maintenance of wilderness/inventoried roadless areas. Jobs for the local community should not be taken into consideration. The government should not be in the business of regulating and protecting jobs. In a free market system, there are no guarantees. If I open up a store but do not adapt to the changing needs of my customers, I will go out of business. The government should not bail me out. I am sympathetic to the needs of loggers but, frankly, the writing has been on the wall for quite some time now. Those who do not adapt and develop alternative skills should not be protected. If they lose their job, it is due to poor planning on their part. (Individual, No Address - #A22265.75310)

Recognize that no one owes anyone a job just because their parents moved to a certain place to take advantage of economic opportunities that, for reasons beyond their control, are no longer there. (Individual, Pendleton, OR - #A30482.75310)

I am a displaced nuclear worker and have not empathy or sympathy for people who do not want to create new jobs for themselves. (Individual, Silverthorne, CO - #A28101.75310)

YAA does not believe that federal agencies have an obligation to assure uninterrupted employment to any group of people or to assure the financial success of any private enterprise. (Organization, Mariposa, CA - #A23321.75310)

**814. Public Concern: The Forest Service should place a higher value on roadless areas than logging and mill jobs.**

Logging and mill jobs are not worth the trade off of sacrificing the relatively small amount of unlogged and unroaded area we have in the United States. (Individual, Portland, OR - #A3676.75000)

Local involvement becomes one of many factors, and the potential future use of a local economy should not be taken into consideration—for instance, opening new roadless lands to preserve a few timber harvest jobs is not a good idea. Roadless lands should be preserved beyond our immediate needs, unless in time of national or world crisis. Loggers can move; computer dot.com executives have had to adjust to a depressed new world, and so can traditional laborers. (Individual, West Yellowstone, MT - #A1045.75000)

Recognize that economic forces will assure that there will always be alternative private sources for timber, etc, but that the public lands must be held in reserve for public purposes that are not served by such private means. (Individual, Pendleton, OR - #A30482.75310)

*Effects on Tax Receipts/Funding to Communities*

**815. Public Concern: The Forest Service should discuss impacts of a national roadless rule on Bankhead Jones payments to states and counties.**

Also impacted are the Bankhead Jones payments to the state and counties. These payments are based on the revenue generated from the National Grasslands and are used for funding our roads and schools. The Final EIS failed to address these impacts. (Elected Official, McKenzie County, ND - #A27737.75500)

**816. Public Concern: The Forest Service should continue removing timber to fund schools.**

No more road closures and open the forests to harvesting its renewable resources which help to fund our schools and educate our children. Open the forests “For The Children.” (Individual, Kalispell, MT - #A1140.75730)

**817. Public Concern: The Forest Service should work to change the rural school financing system.**

**TO REDUCE THE NEED FOR HIGH TIMBER REMOVAL LEVELS**

The best way to manage roadless areas is as follows:

Alter the school financing system so that local school districts no longer have an incentive to push for high timber cut levels. (Individual, Dallas, TX - #A18002.30200)

**818. Public Concern: The Forest Service should support a 100 percent tax on lumber to reduce demand and support affected local communities.**

I believe if we doubled the price of lumber by taxing it at 100% of its retail price that would help demand. We could then take the taxes collected and put them into communities losing jobs and thereby help them make the transition to other economic activity. In the end, if we learn to live with less lumber by treating it as more valuable we have a chance to both slow consumption as well as raise the monies necessary to help those who depend on lumber get retrained for other jobs. If the price of lumber doubles, people will use more cement and other materials (adobe, etc.) that other countries without lumber resources have proven can be adequate for a manor of housing stock, including luxury homes. It is time to take aggressive, progressive action and this is one of many aspects of what that could be. (Individual, Portland, OR - #A6838.75000)

**819. Public Concern: The Forest Service should ensure that counties understand the impacts of the Conservation and Reinvestment Act on their tax base.**

Examine the tax revenues and fees (property taxes, assessments, etc.) that are generated from private lands within the political boundaries of the federal lands within their county. Between 1993 and 1998 the Forest Service and Bureau of Land Management studied property tax revenues in counties that receive PILT. That study was aimed at attempting to understand how the combination of PILT and 25% payments (logging and other multiple-use revenue shorting) would compare to property tax payments if the federal lands were privatized and managed in a manner similar to current federal management prescriptions. The results are dramatic and have broad application to how counties should think about CARA. Examine the costs and savings of federalizing the private lands within their county. (Individual, Jefferson, OR - #A775.75720)

The effect on economic activities on the lands likely to be acquired is a most critical consideration. Given federal land management over the last several years, and the objections to economic and recreation activity in federal areas by environmental groups, it is safe to assume there would be little or no economic activity generated if private lands are federalized by CARA through land acquisition. So, if the private lands within or adjacent to the boundaries of your national forest or other public land system are acquired, which businesses and how much employment activity will be lost? For example, the entire North Woods of Maine and the Northern Forests of New York, Vermont and New Hampshire are land acquisition targets for the environmental community. These groups have set their sights on 26 million acres for new Federal parks, refuges and national forests. The North Woods is almost all-private land at this time. How many jobs will be lost in the timber and recreation communities if even a small portion these lands are turned into new federal and state designations or National Monuments? There is no simple way to get this data or perform this analysis. Each county should make their best estimate to understand the potential impacts of CARA on their tax base and the economic future of their county. (Individual, Jefferson, OR - #A775.75700)

**820. Public Concern: The Forest Service should not reduce minerals royalty payments and income to local governments by restricting access through a national roadless rule.**

State and local revenues will be reduced by wholesale restrictions of federal mineral development in roadless areas. Exploration and development of minerals requires access. The rule prohibits access. It will also eventually end federal oil and gas leases on 219,000 acres, a large portion of the North Dakota Grasslands.

State and local revenues will be impacted because roadless areas will discourage mineral development on adjacent federal, state, or private mineral holdings. Isolated tracts, or tracts of smaller size are less desirable for mineral exploration and development due to economic factors associated with those activities. The rule ignores reserved oil and gas royalty interests of western counties that contribute to local revenues. (Governor, State of North Dakota - #A22065.75530)

Several counties, which have National Grasslands within their boundaries, reserved a 6.25% royalty interest in the mineral acres that were transferred to the federal government. This royalty interest will be affected by the roadless plan because the 266,000 acres of North Dakota's National Grasslands classified as roadless will not be leased or re-leased once the existing oil and gas leases expire. This decision will have an enormous impact not only on the county revenues generated from this royalty interest but on the economy of western North Dakota that depends on the oil industry as one of its base industries. (Elected Official, McKenzie County, ND - #A27737.75530)

The intermingled nature of the National Grasslands results in development of state lands and private mineral acres being closely associated with the development of the federal mineral acres. The failure to lease and develop the federal minerals will have a negative impact on the leasing and development of the state lands and private minerals. (Elected Official, McKenzie County, ND - #A27737.75530)

Coal has been produced from the southern part of the Piceance Basin, including the northern corner of Gunnison County, since the late 1800s with more than 100 miles having operated at various times along the margin of the Basin. . . . These two mines produce 35-40% of all produced in the State of Colorado, and the North Fork Valley is considered the premier coal-mining region in the State of Colorado.

These mines are among the top taxpayers in Gunnison County (the West Elk Mine is the #1 payer and the Sanborn Creek Mine is currently #3). Without access to coal reserves, the future of these mines is foreclosed and Gunnison County will be significantly impacted. (Elected Official, Gunnison County, CO - #A22061.75530)

The mining of western federal coal generates hundreds of million of dollars in federal royalties, states taxes, federal taxes, and it provides high-paying jobs for many thousands of rural residents in the western states. (Association, Washington, DC - #A19636.75530)

Unlike the question of roads, the Forest Service has a full record and a judicially mandated obligation to respect the county royalty interests. (*McKenzie County v. Hodel*) Nevertheless, when dealing with the roadless issue, the Forest Service again ignored the contractual obligation on the part of the United States to not take any action contrary to those interests, including placing them in wilderness and unavailable for mineral leasing.

Throughout the roadless rulemaking and the final plan revision, the Forest Service again ignores interests. Indeed, the Forest Service actually represented to the public that the roadless regulation would not interfere with energy production. In response to a letter sent by the counties, the Forest Service also failed to admit that more than 250,000 acres of the Little Missouri National Grassland would be closed to new energy development. (Elected Official, McKenzie County, ND - #A27737.65300)

## **821. Public Concern: The Forest Service should exempt Utah school trust land coal resources from a national rule.**

### **BECAUSE THEY WERE INTENDED TO COMPENSATE FOR GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT RESTRICTIONS**

In light of this deliberate congressional intent to grant the State of Utah resources that could be readily accessed to quickly provide replacement school trusts funds for those lost as a result of the proclamation of the Grand Staircase-Escalante National Monument, it is not only arbitrary and capricious but also an extraordinary breach of good faith to now designate these areas within which the State of Utah holds coal resources from the 1998 Exchange as areas of "special concern" that require roadless area conservation status. Even though the State of Utah and its lessees are excepted from a prohibition on road construction in order to reach these resources, the Roadless Rule nonetheless creates an entirely new, special management designation for these areas that may include heightened environmental scrutiny, such as an automatic EIS requirement, that will lead at best to development delays. As the Roadless FEIS itself recognizes, these heightened requirements and their concomitant costs may even make the development of some resources uneconomic. See FEIS, Vol. 1 at 3-316 -3-317, 3-321.

These increased costs threaten to significantly diminish the flow of revenues to the Utah school trusts that Congress intended to protect in the 1998 Exchange. Moreover, the other beneficiaries of that exchange, coal lessees like Pacificorp, have their ability to economically develop coal lessees threatened. The Utah school trust lands gained in the 1998 Exchange were not meant by Congress to be so encumbered, and even in light of an exemption to build a road to reach the coal there, the designation of these areas thwarts the will of Congress. (Association, Washington, DC - #A19636.75530)

**822. Public Concern: The Forest Service should recognize the positive contributions of ski areas to local and federal government revenues.**

Winter sports resorts that operate on National Forest lands, contribute significantly to the local economies in other ways that add to the economic stability of the communities. The counties annually collect property taxes on the buildings and ski lifts that are located on lands within the counties. These taxes are paid on a regular basis and the counties can count on receiving these funds. Historically, property taxes paid to Adams and Valley Counties have increased on a regular basis since the resort opened in 1961. As is the case with other businesses catering to the public, the resort collects and pays sale taxes to the State of Idaho. A portion of this money is returned to the county in which it is generated.

Ski-based resorts also pay an annual use fee to the federal government based on the revenue generated each year. By law, a percentage of revenues from the sale of forest products and permitted operations are returned to the counties and used to fund public schools and roads. Unlike some of the other payments that go to the US Treasury for commercial use of forest resources (i.e., timber receipts), these taxes and fees are similar to rent for the use of the land and vary comparatively with the ski industry in that a significant amount of revenue is generated in almost perpetuity from a comparatively small tract of land. In the case of resorts like Brundage, which has been in operation for 40 years and intends to continue in business for the foreseeable future, this is an economic factor that should be considered in the roadless protection and forest planning process. (Permit Holder, McCall, ID - #A15317.75540)

**823. Public Concern: The Forest Service should recognize its responsibility to rural western communities harmed by the Roadless Area Conservation Rule.**

Governors Marc Racicot of Montana and John Kitzhaber of Oregon recently stated that they believed the federal government has a special responsibility, both moral and legal, to rural communities of the American West. They observed that the policies of the federal government for nearly 140 years encouraged development of this nation's natural resources. As a result, small towns sprang up and people put down deep roots that allowed them to weather market fluctuations and whims of nature. The one thing they thought they could depend on was continued access to the National Forests and other public lands that are the source of their livelihoods. Now, under the January 12 Rule, the federal government is poised to put an end to that possibility. (Association, Spokane, WA - #A17351.75200)

**824. Public Concern: The Forest Service should provide a fund to benefit communities impacted by roadless designations.**

Personally, I would be in favor of a fund to relocate, retrain, or otherwise benefit local communities impacted by roadless designation, but I feel that the importance to the nation outweighs the damage, if any, done to local interests. (Individual, Louisville, CO - #A30201.15100)

**825. Public Concern: The Forest Service should not make payments to counties in lieu of harvest receipts.**

Now, the federal government is making payments to counties in lieu of harvest receipts. Whatever happened to the idea of the American pioneer spirit; the spirit that so typified the westerner? Has the American lost that or has the federal government given it away as the price of appeasing a trespassing tree-sitter? Does society now "owe" us a living? How is it that, in less than a century, Oregon's Benton County went from 1-1/2% publicly owned to nearly a quarter? I see this as a very fundamental shift in our society and it disturbs me greatly. Now we want to guarantee payments to the county in lieu of timber harvest receipts. That sounds like welfare and socialism. We, the American citizen, the

stockholder in this enterprise, own the land; let's use it! Let's use our wit and intellect! This shift disturbs me greatly. (Individual, No Address - #A25635.75700)

**826. Public Concern: The Forest Service should not attempt to buy the support of affected communities with transition payments.**

The Roadless Plan indicates that the Forest Service will petition Congress for funding to provide "transition payments" to those communities that would have adverse economic impacts as a result of the Plan. We find it particularly abhorrent that the federal government would attempt to bribe affected communities with a risky and temporary payment scheme to accept a plan that is so devastating to our economy and our tax base. Are we supposed to use this money to rent U-Hauls for people leaving because they have no job and to hire plumbers to drain the water from the pipes in our schools when we have to close them? (Elected Official, McKenzie County, ND - #A27737.75200)

**827. Public Concern: The Forest Service should not develop a plan to relocate affected residents in compensation for a national roadless rule.**

We are particularly upset over a plan that advocates relocation of residents to other communities or regions of the country as a method of implementing the stipulations of the Roadless Plan. As an Agricultural State, North Dakota did not participate in the economic boom that the people on the East and West coast have experienced. To be then told that we will have to suffer additional economic damage so these people can feel good about there being "roadless" areas somewhere in North Dakota is especially disturbing to those of us who work hard in trying to build our local economies. (Elected Official, McKenzie County, ND - #A27737.75200)

*Impacts on the Global Economy*

**828. Public Concern: The Forest Service should consider the potential transfer of environmental effects of timber removal to other countries with lower standards.**

What is the long-term effect of making resources on roadless lands essentially off limits, locally and nationally? Will more pressure be placed on commodity production from other countries without effective environmental protections? (Organization, Salt Lake City, UT - #A12009.75950)

Regarding timber resource, the effect would further shift the burden and impacts of wood consumption to ecosystems contained in private forests in the U.S. or forests of other countries. The result in the last decade of federal timber harvests dropping about 79% from about 13 to 14 billion board feet annually, caused imports to rise dramatically to 36% of U.S. softwood lumber consumption. The high harvest and export of old growth boreal forests in Northern Quebec and Alberta is a public issue of concern to their citizens. The harvest of softwood timber from the private forests of the Southeastern United States currently exceeds the rate of growth. Tropical hardwood ecosystem can't continue to provide wood products at the current extraction rate. A roadless rule must consider the consequences of timber supply in the global market along with the associated "ecological transfer effects." (Organization, Lakeshore, CA - #A28962.65200)

**SUPPORT INTERNATIONAL SUSTAINABLE FORESTRY PROGRAMS**

The WRI report estimates that the world demand for industrial wood fiber will rise from current levels by 20 to 40% in the next ten years. This increased demand will likely be met on the global level but regional shortfalls are likely to occur. They contend that if the current harvesting patterns of production are not changed, that economic pressures created by the demand will result in wood fiber being obtained at an increasing level from the worlds remaining "frontier" forests. As a consequence, the tropical forests of the Amazon and equatorial Africa and the boreal forests of Siberia and Canada will continue to have more pressure for timber harvesting and management of their forest resources. What are the alternatives: Success with improved availability of wood fiber in developing countries will depend on a variety of issues and programs. Lack of land tenure rights, political instability, and lack of funds and

national programs to reinforce tree planting and tree care all contribute to loss of forest cover. Programs such as community woodlots, and agroforestry applications which provide crops and wood fiber from the same land area, continue to hold great hope for improving existing long-term supplies of wood fiber. However, global support for such programs must continue. (Individual, Fairbanks, AK - #A15.50420)

### **829. Public Concern: The Forest Service should allow timber removal in roadless areas.**

#### **TO REDUCE DEPENDENCE ON FOREIGN SOURCES**

To reduce dependence on foreign sources It takes no sense to import almost half of our softwood lumber products from Canada, and at the same time allow millions of acres of dead, dying, unhealthy or burned acres of our National Forests to not be harvested. Just because the Environmental Extremists have learned how to use the courts to further their agenda, and have been successful in using the liberal media to brainwash the masses to agree with their agenda doesn't mean it makes sense or is what's best for the country or our National Forests. Most American's live in the bigger cities and they don't have a clue, as the old adage goes "where milk comes from," or for that matter what it takes and where a 2x4 comes from. (Individual, No Address - #A676.12200)

### **830. Public Concern: The Forest Service should allow mineral development in roadless areas.**

#### **TO REDUCE DEPENDENCE ON FOREIGN SOURCES**

The establishment by administrative action on January 12, 2001, of roadless area protection for 60 million acres of non-wilderness areas has serious economic consequences to a large number of forest dependent local communities, states with significant national forest lands, and the nation as a whole. This alone justifies a serious, wholesale reconsideration of this rule. In addition, this area represents approximately **one-third** of the 192 million acres managed by the USFS. In the January 12 Rule, the Forest Service provided no evidence that a national roadless rule would improve the system under which local agency officials made decisions regarding road construction on a case-by-case basis utilizing the local forest planning process.

The USFS proposal would adversely affect NWMA members economically, spiritually, and emotionally. A significant number of our members have made substantial investments in mineral related activities occurring within the National Forest System. Their future business interests are directly and irreparable harmed by the January 12 Rule, as needed access is prevented. Also, they take great pride and comfort in the knowledge that America has viable sources of minerals vital to our national security and future prosperity. The new rule has shaken their confidence in the ability of our country to achieve sustainability. (Association, Spokane, WA - #A17351.75530)

The USGS July 2001 Report on increased U.S. reliance on imported minerals shows starkly how implementation of the Roadless Rule could well further weaken the minerals position of the nation. As a matter of sound policy and balanced implementation of its statutory authority, the Companies urge the Forest Service to carefully consider the USGS's findings. . . . Finally, in connection with locatable minerals, the Companies wish to reference the enclosed letters of this past November from members of the Armed Services Committees of the Congress and the Western Governors' Association. See Attachment 7. These letters, addressed to the Secretary of Defense, raise serious (and, as yet, unanswered) questions about the adverse impacts of the Clinton Administration's last minute regulatory binge upon the stability of the strategic and critical minerals supply in the United States. The Companies urge the Forest Service to be responsive to the questions raised by those letters as the Agency considers revision of the Roadless Rule. (Association, Washington, DC - #A19636.75530)

I feel that with the new Chief and Administration we will begin to head in a new direction, but I know it will take time. To me, just like it makes no sense to import so much of our energy needs from sometimes unreliable foreign sources (when we have untapped domestic sources). (Individual, No Address - #A676.12200)

. . . the coal reserves adversely affected by the Roadless Rule are substantial, even by the Forest Service's own flawed assessment. Thus, turning to the preamble of the Roadless Rule once more, the Forest Service stated: "Between 38 and 1,371 million tons of coal on the Grand Mesa, Uncompahgre, and Gunnison and Manti-LaSal National Forests [in Colorado and Utah] could be unavailable for development as a result of this rule." 66 Fed.Reg. 3268. Again, to provide a frame of reference, last year's *total* national coal production was approximately 1.1 billion tons of coal. As a nation, at a time when we are realizing that we need all the domestic energy that we can safely produce in an environmentally protective manner, we simply cannot afford to write off a 1.37 billion ton reserve of high quality, low sulfur clean coal. And with regard to protection of the environment, existing federal law specifically mandates that coal mining on National Forest lands must be conducted in accordance with stringent environmental standards and procedures—and, then, that same body of law requires the reclamation of coal mines when active mining is completed. (Association, Washington, DC - #A19636.20300)

#### **TO AVOID VULNERABILITY TO SUPPLY DISRUPTIONS FROM POLITICAL AND MILITARY ACTIVITY ABROAD**

The domestic mining industry provides about 50 percent of the metal used by American manufacturing companies, and the U.S. is among the world's largest producers of many important metals and minerals—particularly copper, gold, lead, molybdenum, silver and zinc.

But the U.S. Geological Survey recently reported that since 1993 (when mineral imports and exports were roughly equal), U.S. reliance on mineral imports has risen nearly sevenfold in terms of value. See Minerals Commodity Summary 2001, U.S. Geological Survey. By 2000, America had become reliant for some portion of its supply of a number of mineral commodities that it had previously exported, including aluminum, copper, lithium, magnesium metal, rare earths—and even cement. The U.S. remained more than 50 percent import reliant for at least 29 mineral commodities, including bauxite and aluminum, chromium, cobalt, iodine, manganese, nickel, platinum-group metals, potash, tantalum, tin, titanium metal, tungsten and zinc.

To avoid vulnerability to possible supply disruptions from political or military activity and unpredictable price fluctuations, the government needs to develop policies that encourage domestic mineral activity. The January 20, 2001 rule obviously would discourage mineral activity and likely further contribute to this nation's dependence on foreign supplies of certain minerals. The Forest Service must consider this country's mineral needs as it proceeds with this rulemaking. (Business or Association, Washington, DC - #A29622.65320)

#### **831. Public Concern: The Forest Service should consider the effects of its management decisions on the global economy.**

Speculating on Alaska's Forest Legacy, a land of immense forest, unsurpassed scenic splendor, and tremendous recreational opportunities, it seems easy to conclude that given the current relatively low level of harvesting and the large sustainable volumes of wood fiber that are available from both State and Federal lands, that this action will have far-ranging impacts on the management of forest plantations in other regions of the United States and in foreign countries. As the world demand for wood fiber and products continues to grow, forest management decisions in Alaska will have national implications for the cost and in some cases quality of wood products and homes both nationally and abroad. (Individual, Fairbanks, AK - #A15.75950)

#### **EXPORTING OUR NATURAL RESOURCES CONTINUES OUR DEPENDENCE ON FOREIGN SOURCES**

A great amount of lumber being taken from our forests is being sent overseas. This is what my relatives still in the business tell me. Its like the Prudhoe Bay oil . . . "too much sulphur to pay for refining it for our use," so it too goes to Japan. But we were assured that getting the oil would stop us from dependence upon the Arabs for gas. (Individual, Bismarck, ND - #A4194.75950)

**832. Public Concern: The Forest Service should provide a model for other countries on how to preserve national forests from short-term economic benefits.**

We must, as the most powerful and wealthy nation of the world and of history, take the responsibility of acknowledging that the forests of the world are in danger, and must be protected. Our protestations with respect to the brutalization of the rain forests fall on deaf ears when we use our forests for ever-increasing wealth, and expect nearly destitute people elsewhere to sacrifice short-term gain for the benefit of the planet. Let us be the models we can and should be by acknowledging our responsibilities as custodians of this precious planet. Let us put wisdom and future generations ahead of short-term greed. (Individual, Lamont, FL - #A1307.70400)

## User Fees

### Summary

A small number of respondents discuss recreational user fees. These comments are usually directed at management of National Forest System lands generally, rather than management of roadless areas specifically. Some assert that recreational users should pay their way, that these additional funds are badly needed by the Forest Service, and that this income will help broaden support for management direction that favors recreational over commodity uses. Some suggest that this fee structure be based on relative environmental impact of a particular use. Others ask that user fees, including the Fee Demonstration Project, be terminated. They believe that the fee demo program is discriminatory, violates the intent of the creation of public lands, is a double taxation, and promotes commercialization of the national forest. These respondents state that fees are unfair due to continued commercial user subsidies and disproportional impacts to low-income people.

**833. Public Concern: The Forest Service should raise funds through user fees.**

Fee-for-use can help defer costs tremendously. Build recreational areas to MAKE MONEY. (Individual, Humboldt, TN - #A464.17120)

Money is usually the issue and I would be in favor of "tolls" for wilderness access in order to assure proper enforcement of regulations in order to avoid closures. (Individual, Lake Havasu City, AZ - #A735.17120)

I also think the user fees the forest service charges are reasonable. I appreciate that you allow me to write a check and pay for my campground. (Individual, Paducah, KY - #A1693.17120)

As the population of Arizona (and other areas in the world from which tourists come) increases, the demand for uses of the roadless areas will increase.

This demand will require that the Forest Service request (or promulgate) clear policies and rules to deal with this increasing demand.

Enforcement of new policies and rules that are handed down or are promulgated by the Forest Service will usually require additional resources.

These resources can come from appropriations or sharing of resources by would-be users. The Forest Service might be well advised to ask users to pay for use at a rate that will meet the incremental management and maintenance costs. (Individual, Cottonwood, AZ - #A26396.17120)

**FROM TIMBER REMOVAL AND ROAD USAGE**

Management of FS lands in the future should be partly funded by drastically increasing the cost of lumber leases and by changing fees for road usage, as is done by many leases and by charging fees for road usage, as is done by many logging companies now to people who use their roads for recreation. (Individual, Winthrop, MA - #A19642.17100)

**834. Public Concern: The Forest Service should implement a user fee system based upon relative impact.**

**TO HELP DEFRAY THE EXPENSES OF ROAD AND TRAIL MAINTENANCE AND LAW ENFORCEMENT**

My property adjoins a portion of the Shawnee National Forest in Southern Illinois, and I have had the opportunity to observe the effects of various logging techniques and recreational vehicles over the years. From my observations, I have come to believe that the Shawnee Forest has been overdeveloped in terms of road access, and that maintenance of these roads has been sporadic and inadequate. Furthermore, a small but active group of recreational vehicle users has created significant erosion on the forest property for illegal activities (poaching, trespassing, theft, cropland damage). I therefore attended meetings last year to voice my support for designating Roadless areas, and implementing a user fee system based upon relative impact to help defray the expenses of road/trail maintenance and law enforcement on Forest Service property. (Individual, Cape Girardeau, MO - #A1674.45100)

The issue of FEES and the value of a LACK OF FEES when possible, should be addressed. When negative impacts are caused, then fees sufficient to rectify such impacts should be imposed. Otherwise, there should be no fees. (Charge what DESTROYS, not who ENJOYS!) (Individual, Bishop, CA - #A20954.17120)

**835. Public Concern: The Forest Service should not charge user fees for recreational use of national forests.**

Immediately banish the fees program as it is discriminatory, violates the intent of the creation of public lands and promotes commercialization of our natural lands. (Individual, Olympia, WA - #A20844.17120)

Additional examples of non-resident, but local increasingly restrictive forest access policy abound. One is the increased use of "fee" areas, another restrictions and paid parking at trail heads, another time limitations on camping and escalating fees in day use areas, once free. The FS feels sufficient consultation and public notice to comply with all governing regulations is made. The fact that subsequent actions ignore the public comment and notice does not seem a primary concern of the local FS. These fees have adverse and disparate impact on homeless, low income and local individuals, homeless being the least consulted group. Residents are probably the second least consulting group although not hard to find for comment. (Individual, Prescott, AZ - #A28094.17120)

**BECAUSE THEY ARE UNFAIR TO LOW-INCOME FAMILIES**

It is the public's right to enjoy all of the public lands their taxes pay for - and without extra park fees which stop poor families from exposing their children to the wonders of nature. (Individual, Phoenix, AZ - #A7809.70700)

**BECAUSE CONSUMPTIVE USERS DO NOT PAY THEIR FAIR SHARE**

The Forest Service has made a number of concessions to the logging industry. Roads have been built to facilitate the harvesting of timber, timber which is sold at a mere fraction of its value. On the other hand, recreational users like myself are expected to pay a user fee just to hike or engage in other non-destructive activities in our national forest. This is extremely unfair. (Individual, Philadelphia, PA - #A1623.75600)

**836. Public Concern: The Forest Service should end the fee demonstration project.**

Please end the Fee Demonstration Project now. With all of the money you are receiving from timber and mining interests, there should be no excuse for your mismanagement of funds. (Individual, Seattle, WA - #A7758.17120)

I hope that you will oppose all efforts to impose "Recreation Fees" by supporting permanent implementation of the Fee Demo program. If this program is allowed to continue, our forests will be developed for revenue intense recreation at the expense of simple activities such as hiking, study, education, or solitude. The Fee Demo program, written and supported by the ARC (American Recreation Coalition), is an attempt to undermine public will by imposing fees that demonstrate popular support for industrial recreation. Our forests should remain wild and free if this country is to remain so. Please support an end to this insidious program. (Individual, Boise, ID - #A12034.17120)

The real economic value of national forests comes from recreation and environmental quality of life, which the Roadless Area Conservation Rule carefully preserves. Approximately 85 percent of the revenue generated from America's national forests comes from recreational activities, more than five times the amount generated by logging. This fact, however does not justify or condone the imposition of an unfair user fee: the Fee Demo Program. (Individual, Las Vegas, NV - #A5989.75400)

**837. Public Concern: The Forest Service should consider the economic impacts of user fees.**

If fees are proposed or imposed, any impacts on the poor relative to the rich should be addressed. The poor often visit or even choose to live near roadless and wilderness areas because, unlike the rich, who can take a cruise, or vacation in Tahiti "to get away from it all," they often can only afford to hike or bike in wilderness or quasi-wilderness type areas "to get away from it all"! No provisions should be enacted which grant an advantage to the rich, as against the poor, in the ability to enjoy unroaded natural areas in a non-injurious manner. (Individual, Bishop, CA - #A20954.17120)

**838. Public Concern: The Forest Service should ensure equal hunting and fishing fees in all states.**

I also want to comment that all public lands should be accessible to all the public! Hunters and fishermen should not have to pay extremely high fees and licenses should be available for hunting and fishing for the same price for anyone from any state because it is federal public land. There should be a standard license fee set up and all states would charge the same for hunting or fishing on federal public lands. Lets equalize the fees so some states cannot gouge the public when they use the federal public lands. (Individual, Bellingham, MN - #A7339.17120)

## **Subsidies and Agency Expenditures**

### **Summary**

The topic of subsidies and agency expenditures generates a great deal of comment related to the economic effects of roadless area conservation. A number of respondents discuss the issue of subsidies for commodity users across National Forest System lands generally, and state that these subsidies also drive timber removal in roadless areas that would otherwise be uneconomical. Overall, respondents assert that private industries should not be subsidized to remove natural resources from public lands. They state that environmental degradation, restoration efforts, and deferred maintenance costs only add to direct subsidies, resulting in even greater losses to taxpayers. Such subsidies on the Tongass National Forest are a particular topic of comment to respondents, who often cite multimillion dollar annual losses to the U.S. Treasury as ample

reason to extend a national roadless rule to this national forest (see also Chapter 5: Designating Areas (Question 8): Inclusion/Exclusion of Specific Areas from a National Roadless Rule: *Inclusion*). Some respondents ask that any remaining long-term contracts be immediately cancelled. Others assert that subsidies are unfair competition with their own businesses, whether harvesting timber from private lands or producing recycled products as an alternative to virgin lumber. Several respondents suggest that, rather than allowing below-cost timber sales, the Forest Service should disburse subsidies directly to timber workers.

A number of respondents call for the Forest Service to end all below-cost sales, and to account for all costs in these calculations, including non-market costs. Some request that the true market demand for Tongass timber be recalculated to include the incentives to over-consume based on artificially low prices due to subsidies. Others ask that a more careful study of economic factors be carried out when making any timber sale decisions in roadless areas; such factors, people say, should include increasing agency losses in the timber program and rapidly increasing costs of road rebuilding and maintenance.

Some request that the Forest Service hold timber companies more fiscally accountable for the effects of their actions. Suggestions from the public include requiring companies to post bonds to cover the cost of restoring any damage to ecosystems, requiring companies to remove slash and to pay for all road-related costs, and deferring payments or credits until full stand replacement is verified. Some state that the agency should regulate timber companies as monopolies, with fixed rates of return and careful oversight.

Others assert that entrenched subsidy and personnel advancement policies within the Forest Service create incentives for employees to continue to support an otherwise unjustifiable timber program. According to one individual, the Forest Service should reform its financial incentive system that promotes active management in roadless areas and removal of old-growth timber, which this person believes ignores long-term ecological considerations necessary to ensure healthy, diverse ecosystems. This individual also writes that the Agency should no longer use Timber sales as employee incentives, bonus programs, or determining factors in funding jobs and programs. As an alternative to timber subsidies, some respondents ask that the Forest Service redirect these funds to ecosystem restoration efforts, sustainable timber removal in roaded areas, or private tree farms. Several also request that the Agency end subsidies to ranchers with allotments on National Forest System lands.

### **839. Public Concern: The Forest Service should not subsidize extractive industries on public lands.**

More roads in such areas will remove more acres of land from production and threaten our water sheds, clean air, agricultural and recreation opportunities, and ultimately our local economy. Real costs can not be recovered by timber sales on public lands, and mining development usually results in costing more in local and federal clean-up and restoration expenses than it gains in tax revenue from the responsible companies. The price is too high for the taxpayer and the economy. (Individual, Bozeman, MT - #A6077.75600)

#### **BECAUSE THE REAL VALUE OF FOREST LANDS LIES IN THE ECOSYSTEM SERVICES THEY PROVIDE**

I think the economic value of logging has been overrated compared to the economic value of roadless areas, including tourism and local use related to fishing, hunting, rock climbing, backpacking, backcountry skiing, and wildlife/landscape viewing and photography. The economy of the Mountain West is in transition away from extractive resource-based industries, and resource management should recognize this. The economic future of the Mountain West will depend more and more on beauty,

recreation, and intact ecosystems. Let us not continue to subsidize destructive activities incompatible with the real value of this country. (Individual, Manhattan, MT - #A671.75310)

I am deeply concerned about the use of taxpayer dollars to subsidize the overuse and destruction of our publicly owned natural resources. This especially applies to roadbuilding in our National Forests. We must wisely use this land and I believe that the ecological service it provides will grow in importance as time goes on. Therefore, I urge you to let the roadless Area Conservation Rule stand as it is written in the January 2001 Record of Decision. (Individual, Fayetteville, AR - #A333.75600)

#### **BECAUSE SUBSIDIZATION AMOUNTS TO CORPORATE WELFARE**

Just like the guy who gets laid off from Motorola, so too must the logger/rancher adjust to the changing times? It is not the forest service's job to subsidize these industries with corporate welfare. (Individual, Wheaton, IL - #A52.75600)

It is apparent that our National Forests have historically been used as a corporate welfare program for the timber, mining, and oil industries. I believe that saving the last 30 percent of America's wild national forests from further corporate degradation is not only a reasonable compromise, but a critical step to take if we as a society hope to maintain wildlife habitat, protect water quality and preserve some of the last truly wild places. (Individual, Portland, OR - #A268.75600)

There is no value in a below-cost timber sale, but that is what we are being asked to support. This is corporate welfare at its worst, and don't think that millions of us Americans fail to make the connection between campaign contributions and losses to the treasury due to under cost timber sales. (Individual, Missoula, MT - #A1933.75610)

A key point U.S. Senator McCain makes repeatedly is that large corporations are the beneficiaries of large amounts of undue public largesse. The mining and timber industries are classic examples of this cronyism capitalism, something our country frowns upon when it happens in other nations. The Forest Service has a limited budget, and it cannot even afford the full costs of maintaining existing roads it built that give large mining and timber companies access to federal lands. Your departmental budget and that of every other federal department is likely to get even more limited, given other spending priorities and shrinking available taxpayer dollars. Much lip service is paid to cost-benefit analysis when it comes to environmental protection, but the same kind of cost-benefit study never seems to surface when it comes to the return on investment of taxpayer-subsidized environmental degradation. In our view, that was former Interior Secretary James Watt's greatest failure. We can respect, if not agree with, a position that all available natural resources are to be exploited in the name of free enterprise. However, there is no business case in any capitalist sense for unprofitable resource extraction. The only way it pays for mining and timber companies to exploit public lands is if they can externalize much of their true costs onto the backs of taxpayers, letting us foot the bill for the access roads and the cleanups. (Individual, Forest Hills, NY - #A6156.75600)

#### **BECAUSE IT IS UNFAIR COMPETITION WITH PRIVATE FOREST OWNERS**

Continuing to allow taxpayer subsidized harvesting is unwarranted competition or private forest owners. (Individual, Salem, OR - #A8263.75610)

As a private landowner (400 acres) of timberland, I ask that you not open the roadless areas to timber harvest. This puts the government in competition with woodland owners because of subsidies for roadbuilding. (Business, Portland, OR - #A37964.75600)

#### **BECAUSE IT IS UNFAIR COMPETITION WITH RECYCLED PRODUCTS**

Since the roads built through our Federal Forests (using tax dollars) often primarily serve private firms' needs to move timber, this rule is a critical step to reduce the subsidies for virgin materials that make it difficult for recycled products to compete. (Elected Official, Bronx Borough, NY - #A15554.75610)

When the government makes extractive resources cheaper—more available, it kills recycling—offices buy new paper because it is so cheap! Please help the market help the people and the future of our economy—don't weaken the Wild Forest Protection Plan! (Individual, No Address - #A1542.75000)

**840. Public Concern: The Forest Service should recognize that the value of removing timber is outweighed by the cost of mitigation measures made necessary by harvesting.**

When industry builds roads in the forests around the region I live in the government is required to build to a standard and to protect water quality from run off. The amount of personnel required to design and implement and the standard to which construction must be done makes the cost higher than the timber being harvested. (Individual, Lakeside, MT - #A5234.10111)

**841. Public Concern: The Forest Service should not allow below cost timber sales to occur.**

**ADD A DIRECTIVE THAT NO TIMBER SALES WILL BE ALLOWED WHEN FULL COSTS EXCEED RETURNS BY MORE THAN 10 PERCENT**

[Adopt] "No timber sales shall be made unless the benefits to the United States exceed the costs thereof, taking into consideration the costs of all payments to local governments (in lieu of taxes or otherwise), all credits against sales proceeds for road construction or other credits, costs of revegetation, and reasonably quantified costs to watersheds, watercourses, and commercial and game fish."

If possibly you feel that such a provision might be too strict, then please provide, instead, that those costs cannot exceed the sales proceeds (without credits) by more than ten percent. The Forest Service will be able to cost-out a timber sale to determine whether it is having a favorable financial impact. Therefore, it would appear in the great interest of the taxpayers that the Service adopt a regulation supplementing this rule or otherwise that, whenever a sale is shown likely to be unfavorable financially, then it [will] not be offered. We do not believe it is fair to the government's other efforts (such as defense, education and prescription drug benefits) or to the taxpayers that the costs of any sale should exceed the sale's proceeds by more than 10%; to do otherwise would be running too large a program deficit! (Organization, Birmingham, AL - #A21582.75610)

**BECAUSE IT IS UNFAIR TO TAXPAYERS**

The whole public owns the national forest; they're tired of having their tax dollars subsidize giant timber companies. The U.S. Forest Service loses hundreds of millions of dollars a year in below-cost-timber sales. (Individual, Lafayette, CO - #A807.75000)

I grew up in the Pacific Northwest. In my lifetime I watched clear-cut logging destroy our old growth forests in order to sell raw logs (with no value added quotient) to Japan. The taxpayer's subsidized this logging activity while the timber companies made all the profits. Next when the salmon runs were decimated from instream sedimentation, the taxpayer had to buy the fisherman's boats. Finally for the final fiscal insult the taxpayer paid to clean up small towns in W. Washington which were predictably flooded by spring run off coming unimpeded through the logged areas. (Individual, Bozeman, MT - #A7094.75600)

**BECAUSE THE U.S. IS FACING BUDGET DEFICITS**

Many of the roadless areas protected by the Conservation Rule would have been timbered if it were cost-effective to do so. However, many are too steep or too remote or, due to other factors, are not cost-effective to timber. It has been reported that the Forest Service, until recently, had lost between \$800,000 and \$1.2 billion every year on timbering in the national forests. In a recent year, \$29 million was lost in timber sales in the Pacific Northwest alone. Even though we are having some budgetary surpluses, it clearly appears that they are not as large as were anticipated and that we might be in a deficit position in the next few years. The nation, consequently, should not engage in subsidizing private interests when that is destructive of a natural resource. (Organization, Birmingham, AL - #A21582.75610)

**BECAUSE TAX DOLLARS ARE NEEDED FOR OTHER PROGRAMS**

If you do not wish to support the Roadless Area regulations (notwithstanding their support by the public), then please adopt fiscal directive prohibiting any sales that are not cost-effective to the government. In these days when the Administration has enacted a tax cut and also wishes to pay down the national debt and expand expenditures for defense, education and prescription drugs/Medicare benefits (all "big ticket" items), we just cannot afford any programs than lose substantial money! Therefore, in lieu of supporting the roadless area regulations and so as to save needed funds of the Forest Service, we urge you to adopt a fiscal directive that: "No timber sales shall be made unless benefits to the United States exceed the costs thereof, taking into consideration the costs of all payments to local governments (in lieu of taxes or otherwise), all credits against sales proceeds for road construction or other credits, costs of revegetation, And reasonably quantified costs to watersheds, watercourses and commercial and game fish." If you feel such a provision might be too strict, then please provide, instead, that those costs shall not exceed the sales proceeds (without credits) by MORE THAN 10%; to do otherwise would be running too large a program deficit! (Individual, Birmingham, AL - #A4991.75610)

**BECAUSE THEY PRODUCE ROADS THAT THE FOREST SERVICE LACKS THE FUNDING TO MAINTAIN**

Regarding economics, I hope it is more than obvious that no more below costs timber sales should occur. The roads we all end up paying for are not an asset when we have a huge backlog of needed repairs and maintenance on existing roads. (Individual, No Address - #A405.75610)

The federal government should NOT be subsidizing the forest products industry by building roads into these areas. Unfortunately there is a long and disgraceful history of the Forest Service building roads into these types of areas at the public expense to allow logging. In many, if not most, cases construction of the road network required to conduct the logging operations costs more than the value of the timber. This practice should not continue. (Individual, No Address - #A621.75600)

Economics alone should dictate that no new roads be constructed on public lands. We already have tens, if not hundreds of thousands of miles of roads, which have resulted in a maintenance backlog of billions of dollars. As a society, we cannot afford to maintain and monitor this sprawling network of roadways, nor should we desire to. In fact, I encourage the Forest Service to reclaim unnecessary roads wherever possible. The construction of new roads is certainly contrary to sound economic judgment. (Individual, Durango, CO - #A5420.75000)

Common sense (particularly the fiscal common sense touted by the Bush administration) should tell you that NOT building further roads into the backcountry represents a sound financial decision. Your own figures show the USDA Forest Service can't afford to maintain the roads already on the forest, much less allow for additional ones. (Individual, Atlanta, GA - #A26430.10150)

Protecting and preserving the remaining roadless areas on our public lands serves the public in many ways. The network of roads in the roaded portions of our public lands is already excessive and unmanageable. The U.S. Forest Service road maintenance program costs American taxpayers hundreds of millions of dollars per year and currently suffers a debit of hundreds of millions of dollars. U.S. Forest Service annual reports for every year since 1996 reveal further costs to the taxpayer in the form of heavily subsidized logging, mining, and grazing of our public lands all of which fail to return even the cost of administration. Yet these industries enjoy a second round of subsidies in the form of roads built across our public lands primarily to support extraction of natural resources with recreational access an afterthought often used [as] an excuse to perpetuate already heavily subsidized industrial use of our public lands. (Individual, Kennewick, WA - #A23359.75600)

**842. Public Concern: The Forest Service should revise funding and staffing incentive policies that allow timber management to dominate forest values.**

We think the agency lacks the incentive to balance the conflicting values of forest users. We think the incentives accrue to dominance and control on the side of timber management, rather than to balance,

because of fundamental flaws in the funding mechanisms. We have sat through too many interdisciplinary team meetings where the professional judgment of [wildlife] biologists is overridden by the dominance of the timber line officer; where the principles of watershed management offered by the hydrologists and geologists are squelched and censored by the dominance of the timber management staff; where scientific findings have been “reinvented” to satisfy the objectives of the timber management staff; where planning staffers, upon reaching consensus with conflicting interests, have expressed the frustration that we cannot implement the consensus because it will never be funded; where we have preferred trade-offs and bargained in “good faith” to achieve agreements with others, only to have reviewing officers accept our proffered by renegeing on the trade. We think these types of events transpire because funding allocations make timber management the dominating, controlling force in the agency. (Organization, Damascus, VA - #A17723.15122)

It is time for the Forest Service to reform its financial incentive system that promotes roadless area development and harvesting of old growth timber, causing your agency to ignore long-term ecological considerations necessary to ensure healthy, diverse ecosystems. Timber sales should no longer be used as employee incentives, bonus programs, or determining factors in funding jobs and programs within the agency. (Individual, No Address - #A15267.17100)

**843. Public Concern: The Forest Service should implement a national roadless rule.**

**TO COUNTERACT REVERSE ECONOMIC INCENTIVES AT THE LOCAL LEVEL**

We strongly oppose weakening nationwide protections for our remaining roadless areas through forest-by-forest decisions based on extraction rather than conservation. Extraction economics characterized by reverse incentives such as “purchaser road credits” and the Knutson-Vandenberg Act have undercut forest stewardship and imperiled our public lands through road building, logging, mining, and access by off-road vehicles. Please fully implement the January 2001 version of the final rule so enlightened management will finally prevail. (Individual, Oakland, CA - #A11880.75610)

**844. Public Concern: The Forest Service should eliminate below-cost timber sales and raw log exports on the Tongass National Forest.**

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. (Organization, Missoula, MT - #A17234.75610)

**845. Public Concern: The Forest Service should improve methods for calculating true market demand for Tongass timber.**

**INCLUDE THE COST OF SUBSIDIES**

The Forest Service has overestimated true market demand in the Tongass by failing to take into account the subsidies included in every Tongass timber sale. Market demand depends on many variables, especially the price of obtaining timber. However, the Forest Service definition of market demand relies heavily on mill capacity, with little regard for the price that the public landowner (the Forest Service) might find appropriate to charge for timber. The agency’s interpretation of “market demand” overlooks a fundamental fact: If the U.S. government gives the timber away for free, or charges nominal cost (as it currently does), demand will be substantially higher than if the government charges prices comparable to private suppliers. The Forest Service is under no legal obligation to supply timber to Alaska mills on environmental or financial terms that ensure the mills can make a profit.

The industry claims the lower prices paid for federal Tongass timber reflect government use restrictions (namely, local processing requirements) and higher environmental standards for logging. However, “market demand” for that private timber is reflecting its own implicit subsidies. The biggest subsidy is private landowners’ ability to shift the environmental costs of widespread, unsustainable clearcutting onto third parties (usually, the general public). If that implicit subsidy for environmental costs were removed and those costs were put back onto the landowner or timber buyer, the private owners would have to charge a higher sale price, which in turn would tend to decrease market demand. (Organization, Sitka, AK - #A30486.75600)

#### **846. Public Concern: The Forest Service should consider additional factors in timber sale decisions.**

##### **CONTINUAL AND GROWING CASH FLOW LOSSES**

In 1980 the Forest Service substituted the term “Suitable For Timber Production” for the long-used term “Commercial Forest Land” (CFL). To qualify as CFL forest land must be able to grow 20 cubic feet of industrial usable wood annually. As Forest Plans were approved, 30,480,000 former CFL acres were eliminated from the “Suitable” rating, at 40% drop from 77,752,000 acres to 47,272,000 acres in 1998. Most of this elimination of acres from the timber base was in the 1980s. There are 165 Proclaimed Forests organized as 109 Administrative Forests. Four of these Forests cut timber, but lack any land rated “Suitable”. 14 Forests list 4,824,000 acres as “Suitable”, but their average annual timber growth rating fails the 20 CF CFL test; it is only 16 cubic feet a year, 20% under the CFL minimum. Therefore only 91 Forests have only 42,448,000 timber acres that pass the 20 CF test. Actually, there also may be areas on the 91 Forests that fail the 20 CF test. The amount of timber that can be cut each decade fell even more. This is called the “Allowable Sale Quantity”, ASQ. Since 1980 the 15,064 MMBF ASQ, fell to 6,959 MMBF a reduction of 8.105 MMBF as 54% decline. Most of that drop was in the ‘80s as new Plans were approved. There was no outcry from the timber industry in the Reagan-Bush Administration similar to the current one. As a reality check, when the 14 Forests that fail the 20 CF test are removed, the ASQ falls to 6.694 bil. BF. Leaving aside for the moment, the pervasive timber sale cash flow financial losses, also a characteristic of these 18 Forests, there are only 91 Forests with 42,448,000 acres rated Suitable for Timber Production, with an annual ASQ of 6.694 bil. BF. Continual and growing cash flow losses are not factored in to decisions to sell timber. (Professional Society, Saint Leonard, MD - #A9040.65260)

##### **RAPIDLY INCREASING ROAD REBUILDING COSTS**

In 1998 to run timber sales nationally 11.3 miles of existing logging roads were rebuilt for every new mile. It doesn’t take a genius to figure out that the Forest Service has serious road problems. 92% of the miles of timber roads built-rebuilt were financed by reducing the price of the timber to compensate timber firms for the estimated cost to build these roads. In addition millions engineering and inspecting these roads. A mere 13% of the timber road miles are built with appropriated money. In 1998 the cut was only 3.3 billion BF logging 525,000 acres. The ratio of miles rebuilt to new miles has grown every year, despite the cut falling to 60% of the 1992 level. Viewed over the long term, road deterioration is a growing cancer affecting streams, watersheds, soils and fish. For example, on the money-losing Tongass the road cost runs at least \$75,000 per mile. (Professional Society, Saint Leonard, MD - #A9040.75610)

#### **847. Public Concern: The Forest Service should impose greater fiscal requirements on timber companies.**

##### **REQUIRE TIMBER COMPANIES TO COVER THE FULL COST OF ANY ROAD CONSTRUCTION, REMOVAL, OR RESTORATION**

Forest timber sales should be made only at prices that reflect both the true value of the products harvested at a fair market price. The logging companies should pay for the cost of any road construction—under strictly supervised and environmentally sensitive methods—and then pay for the cost of removing/restoring roads or other damage if deemed appropriate by an agency and citizen committee. (Individual, San Antonio, TX - #A428.75800)

All costs of maintaining present roads (logging) roads and all other forest service costs associated with logging, should be fully and directly charged to timber companies prorated in relation to the board feet each harvests out of the total harvest. (Individual, Scio, OR - #A14375.17000)

The cost of building and closing of these roads reclaiming and seeding of the harvested areas should be shared with the harvester. (Individual, Rock Springs, WY - #A5695.75600)

The only problem with the roadless initiative is that it has too many loopholes and not enough protection of forests and the public interest. If there are to be any changes, they should consist of strengthening it, such as: Loggers, miners, and other beneficiaries of past roadbuilding must be required to pay all costs of remediation of the erosion, sedimentation, water quality degradation, destruction of fish habitat, and other damages that have been caused by roads. (Individual, Oakland, CA - #A28134.75400)

#### **REQUIRE TIMBER COMPANIES TO POST BONDS FOR RESTORATION**

The only problem with the roadless initiative is that it has too many loopholes and not enough protection of forests and the public interest. If there are to be any changes, they should consist of strengthening it, such as: Require the posting of a bond sufficient in size to cover restoration costs over multiple generations. (Individual, Oakland, CA - #A28134.75400)

#### **REQUIRE TIMBER COMPANIES TO REMOVE SLASH AFTER LOGGING**

The Forest Service does not require the timber industry to clean up after logging, slash piles are left for the Forest Service to clean up and the service is not funded to do the job. (Individual, Mesa, AZ - #A99.30100)

#### **REQUIRE TIMBER COMPANIES TO ASSUME DIRECT FINANCIAL LIABILITY FOR ENVIRONMENTAL DAMAGE NOW AND IN THE FUTURE**

Companies working with our natural resources shall assume full liability for any damage, including that not discovered until future generations, with no possibility of bankruptcy, and no shield of liability for the managers or investors. If we as a society are putting our living priceless natural resources at risk, the very least a company and its people can do is place their monetary resources at risk. (Individual, Oakland, CA - #A28134.75400)

#### **PLACE ALL TIMBER CONTRACT PAYMENTS IN ESCROW UNTIL FULL STAND REPLACEMENT IS VERIFIED**

All revenues from extraction of natural resources are held in escrow until replacement of the natural resources is confirmed. In the case of trees, this would take a minimum of decades. In the case of old-growth, this would take a minimum of centuries. Loggers are fond of saying there's nothing wrong with their practices, it will all grow back. OK, let them put their money where their mouth is. If it does grow back, then they'll get paid. If it doesn't, they're the ones who should take the loss, not the public. Anything less than this is a subsidy—i.e. a welfare program. (Individual, Oakland, CA - #A28134.75400)

### **848. Public Concern: The Forest Service should ensure that sales of resources are competitive.**

#### **BY ELIMINATING LONG-TERM CONTRACTS**

I would like to preserve the logging industry, access to rock resources and other natural resources. Sales of resources and leases should be aggressive and competitive, with no long term agreement dates where values might change over time. (Individual, Lacey, WA - #A17762.15160)

### **849. Public Concern: The Forest Service should recognize the budgetary benefits of prohibiting timber removal and road building in roadless areas.**

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. (Individual, Staunton, VA - #A29325.17100)

**850. Public Concern: The Forest Service should regulate all commercial activities as monopolistic public utilities with fixed rates of fair return.**

COMMERCIAL ACTIVITIES and RESULTING PROFITS. Commercial activities allowed on public lands should be allowed, if at all, subject to a public sealed bidding process and a review to ensure profits are not unreasonable. Operations allowed in limited areas of public lands intrinsically enjoy a certain degree of monopolistic benefit. As such, they should be subject to public scrutiny and regulation (as are public utilities) designed to ensure that this monopolistic advantage does not result in "UNDUE PROFITS" at the cost of the public affected by their activities. I propose as a very important general principle that any NOT non-profit operation authorized in or affecting these public lands be restricted to receiving no more net profit than that which constitutes a "fair return" on time and investment, exactly as public utility companies have been for many years. These determinations should be subject to full disclosure and public review, and any excess profits which may occur should be returned, with interest, to the people overcharged or to the authorizing agency. (Individual, Bishop, CA - #A20954.75500)

**851. Public Concern: The Forest Service should disperse subsidies directly to local workers rather than remove unprofitable timber.**

Have you ever considered simply disbursing the dollars that you presently spend to log National Forests to the people who have traditionally earned a living from this? This would be very much like the farm subsidy system that is presently in place. This could be completely eliminated after one generation. (Individual, Asheville, NC - #A6246.75600)

**852. Public Concern: The Forest Service should buy back timber sale contracts.**

As an adjunct to the present administration you should be raising the necessary funds to "buy off" the timber interests, and let them out to pasture (those who have been habitually involved with timber and can live no other way, nor can they be retrained to function sanely in any other occupation, as their heart will just not be in such "retraining programs"). They need to be pensioned off, and fund-raising then needs to be conducted to develop and produce any and all alternative products to wooden construction. To fail to do this is surely to monkey seriously with the regard and REKNOWN with which present and future generations will view the likes of you! (Individual, Bellingham, WA - #A1928.17000)

**TO HELP COMMUNITIES ADAPT ECONOMICALLY**

[Manage] as naturally as possible. NO LOGGING of salvage timber. No timber sales of any kind. If necessary buy back the contracts that have already been sold and help communities economically so they can sustain the changes. (Individual, No Address - #A29275.30100)

**853. Public Concern: The Forest Service should provide economic incentives for responsible use of natural resources in roaded areas.**

Provide economic incentives to behave responsibly, and renew our resources. If logging groups truly do so, they should not have to keep expanding into new areas. Provide additional incentives to recycle forest-derived resources to companies and individuals to reduce the demand for these resources. This is going to HAVE to happen sometime-why not now, before the situation is desperate and logging companies log themselves out of business? (Individual, Arlington, MA - #A1152.75000)

**854. Public Concern: The Forest Service should subsidize commercial tree farming as an alternative to logging public lands.**

Commercial tree farming is one alternative to logging public lands. If the government can afford to subsidize tobacco growers, why not subsidize tree growers? (Individual, Killeen, TX - #A43260.75600)

**855. Public Concern: The Forest Service should devote more money and time to conservation.**

One of the worst things about my job (besides the paycheck) is the thought of what is happening to forests throughout the world . . . I'm sure some of the forest destruction is inevitable, so many countries having floundering economic bases but the US . . . look at this time of economic prosperity, you'd think there would be more money and time to devote to the conservation of nature. (Individual, Allston, MA - #A186.75950)

**856. Public Concern: The Forest Service should subsidize wildlands restoration.**

Restoration of wildlands will take taxpayer subsidies, but as a taxpayer, I prefer to subsidize restoration rather than below cost timber sales. I do not think our slow growing northern forests can sustain the level of harvest required to keep busy the increasingly mechanized timber industry. More and more jobs will need to come from restoration. Restoration jobs rebuild communities and souls as well as ecosystems. (Professional Society, Missoula, MT - #A17054.75610)

**857. Public Concern: The Forest Service should not subsidize ranching.**

Ranchers' cattle are hurting national forests and ranchers get too good a deal for the pasture land. They should be charged much more. I pay more for an out of state hunting license than they do for a whole herd of cattle grazing for a year. (Individual, No Address - #A417.75620)

Remember that its time to start charging accurate rates for the grazing done on public land. (Individual, Blue Springs, MO - #A7209.75600)

Grazing, also, must now pay fair market value for grazing AUMs. Public land AUMs cost well below private sector ones. In too many areas, especially riparian, the damage from cattle and sheep in already fragile areas, is irreversible. (Individual, Kemmerer, WY - #A8383.75620)

Perhaps grazing fees should be increased to reflect a more realistic market value of the land and its use. (Individual, No Address - #A29334.90110)

## Heritage Resources

This section includes one subsection: Heritage Resources General.

### Heritage Resources General

#### Summary

Some respondents assert that roadless areas themselves constitute our national heritage and can best be protected through a national rule. Others specifically mention the need to preserve cultural and heritage resources such as historic sites and structures. One organization writes in that they are concerned about the preservation of old mines, cabins, settlements, railroads and other features used by pioneers, homesteaders, loggers, settlers, and miners, many of which they believe are located in roadless areas. While some respondents assert that a national roadless rule will aid in conservation of these resources, another respondent suggests that such a rule will hinder access, maintenance, and protection of heritage resources. State representatives request a complete inventory of heritage and paleontological resources in Wyoming that may be affected by a national rule. They request consultation with state historic preservation offices, American Indian tribes, and the Advisory Council on Historic Preservation to facilitate this process.

#### **858. Public Concern: The Forest Service should preserve America's national heritage.**

##### **BY PROTECTING ROADLESS AREAS**

Our nation's remaining roadless wild-lands should be protected not only to preserve wildlife, water purity, clean air, recreation areas, scenic values, cultural and historic sites, etc., etc., etc., (I could go on!), but also, quite simply, because they are part of our national heritage. Our great American landscape—the Rocky Mountains, the forests of the Pacific Northwest and Alaska, the swamps of the South, the woods of New England, and the Desert Southwest are not only God's wonderful creations, but they also serve and have served as a glorious backdrop for the great events of American history. We would not be who we are without them. Please protect these lands and let the roadless rule stand. (Individual, Summit, NJ - #A608.50000)

I do not want to see our National Heritage wiped out because our lawmakers were too influenced by shortsighted capitalists. Consider the future, and support this important conservation effort. (Individual, Cambridge, MA - #A1244.80100)

The roadless area conservation measures that have been placed on National Forest Service (NFS) lands afford a level of protections to NFS cultural resources that have not existed previously. Our heritage resources are endangered by any changes that weaken or render ineffective the cultural resource protection and Enhancement of the Cultural Environment. Federal agencies have been inventorying historic and prehistoric sites located on lands they manage. The NFS has inventoried over 277,000 heritage sites since 1973, and this is estimated only to represent about 25% of all their lands. Mike Kaczor of the U.S. Department of Agriculture Forest Service therefore estimates that NFS lands may contain up to one million prehistoric and historical heritage sites. These sites contain irreplaceable information of scientific and cultural value and historic importance to our nation. Therefore we are officially opposed to any attempts to repeal the roadless area conservation measures presently in place. The laws, regulations and enforcement of them need instead to be strengthened to preserve our cultural resources, so that future generations can appreciate the full value of our heritage. (Organization, Middleboro, MA - #A23043.80110)

**BY PRESERVING HISTORIC STRUCTURES AND TRADITIONS IN ROADLESS AREAS**

We are concerned about the preservation of old mines, cabins, settlements, railroads and other features used by pioneers, homesteaders, loggers, settlers, and miners. Many of these are located in roadless areas. These are important cultural resources and should not be removed from the landscape. Western culture has been characterized by opportunities to work with the land and preservation of any remnants of this culture is important. Current land management practices are not adequately protecting these resources and western culture including the opportunity to work with the land. (Organization, Great Falls, MT - #A15315.80100)

**859. Public Concern: The Forest Service should identify historic properties which may be affected by a national roadless rule, and assess and resolve any adverse impacts.**

**IN CONSULTATION WITH STATE HISTORIC PRESERVATION OFFICES, AMERICAN INDIAN TRIBES, AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**

Management of cultural resources on U.S.D.A. Forest Service (USFS) projects is mandated by, and conducted in accordance with, Section 106 of the National Historic Preservation Act and advisory Council regulations 36 CFR Part 800. These regulations require the USFS to initiate the Section 106 process (36 CFR Part 800.3), identify historic properties which may be affected by the project (36 CFR Part 800.4), assess any adverse effects which may result from the project (36 CFR Part 800.5) and to resolve these adverse effects (36 CFR 800.6). These efforts must be conducted in consultation with the Wyoming State Historic Preservation Office and any interested publics, Native American Tribes, and the Advisory Council on Historic Preservation as appropriate. All documentation of these efforts must meet the Secretary of the Interior's Standards for Archaeology and Historic Preservation (48 FR 44716-42). Provided the USFS follows the procedures required by federal law and established in the regulations, we have no objections to the project. (State Agency, Cheyenne, WY - #A22609.20000)

**860. Public Concern: The Forest Service should preserve cultural resources.**

**BY PROTECTING ROADLESS AREAS**

Wilderness and roadless areas are where I (working as a Forest Service archaeologist) can locate historic and prehistoric cultural sites which have not been impacted by other recent development. Prehistoric use of high mountain lakes within some of our present designated wilderness areas, was as important to some people hundreds and thousands of years ago as it is for me and many others today. These remote areas support a variety of plants and animals not found where man dominates. (Individual, Troy, MT - #A1180.80100)

**BY PROHIBITING ROAD BUILDING IN THE TONGASS NATIONAL FOREST**

I oppose building new roads in the Tongass Nat'l Forest. I live in Tenakee Springs and feel some of my favorite places in this Inlet are in jeopardy if the ban on roads is lifted.

In Crab Bay there is a large and complicated petrograph that could be harmed by creation of road access. It would be a great loss to the early history of the area and perhaps to the native culture if these were exposed or harmed.

Please take steps to assure a no road policy in the Tongass Nat'l Forest. (Individual, Tenakee Springs, AK - #A5144.45623)

**861. Public Concern: The Forest Service should ensure motorized access to historic sites in roadless areas.**

We are concerned about the loss of access to historic sites that each closure may produce. That is an example of denying motorized visitors, handicapped, elderly, and physically impaired, access to the forest with out adequately addressing site specific and scientific reasons why. We request that the Forest Service analyze all the roads, trails, and features of interest that they provide access to in this area to determine the benefits of each route. These benefits must be carefully considered in the decision to keep a route open or to close it. (Organization, Great Falls, MT - #A15315.80000)

In addition to taking steps to protect our local western culture, federal agencies should implement a roadless rulemaking alternative that include these features [old mines, cabins, settlements, railroads and other features used by pioneers, homesteaders, loggers, settlers, and miners] as part of motorized interpretative destinations and loops. (Organization, Great Falls, MT - #A15315.80100)

**862. Public Concern: The Forest Service should provide a detailed analysis of paleontological resources in roadless areas covered by a national rule.**

**IN WYOMING**

We believe it is important that the following issues must be addressed in the underlying EIS, on a Wyoming-specific scale:

A detailed analysis of the paleontological resources that are present in the areas proposed for closure. (State Agency, Cheyenne, WY - #A22609.10135)



## Chapter 5

# Forest Management

This chapter includes four main sections: Forest Management, Activities (Question 7), Designating Areas (Question 8), and Agency Organization and Funding.

## Forest Management

This section includes three subsections: Forest Management General, Adequacy of Analysis, and Roadless Areas General.

### Forest Management General

#### Summary

A number of people comment about the Forest Service and its management of public lands generally, rather than its management of roadless areas. Some members of the public state that the Forest Service should shift toward a more balanced management strategy that focuses on recreational uses rather than commodity extraction. Others assert that the Agency has shifted too far toward environmental protection and needs to reemphasize traditional multiple use strategies which include commodity extraction and motorized recreational uses. (See also Chapter 1: National Roadless Protection – General Remarks: Need for a National Roadless Rule General and Need for the Roadless Area Conservation Rule.)

A few individuals suggest new approaches to timber and forest health management, calling for a new ethic of stewardship and ecosystem restoration among land managers. Suggestions include allowing local residents to conduct small-scale restorative logging and to help with controlled burns and fuels reduction, and agency support for the generational land steward program. These respondents state that non-traditional agreements are needed as a substitute for large-scale commercial contracts in order to support local economies and restore forest health. A few people suggest regional or local forest planning processes that should serve as models for the Forest Service as a whole or for its roadless area management, such as the Sierra Nevada Ecosystem Project and the Black Hills Forest Plan.

Others discuss organizational structure and the administrative framework of the Forest Service. Some comment that the Forest Service at the national level should ensure consistent decision-making at the local level; this assertion is echoed in comments which request implementation of a national rule. Some believe that the current agency structure is too complex, and that forests should be consolidated for more efficient management. A few individuals say they are dissatisfied with present Forest Service management and suggest that all roadless areas be turned over to the U.S. Department of Interior or the Park Service if traditional multiple use management is no longer practiced. Others suggest that National Forest System lands be privatized or turned over to local government control.

**863. Public Concern: The Forest Service Chief should guide the Agency in the direction of balanced management.**

**EMPHASIZING RECREATIONAL IMPROVEMENTS RATHER THAN TRADITIONAL EXTRACTIVE USES**

I still am in favor of roadless areas and wilderness! I hope to God, Mr. Bosworth, that you have the guts it will take to face off with the President and the lumber lobby, the mining for the past 30 years—preserve our wilderness and roadless lands! Your 2nd big challenge will be to turn the Forest Service around to an agency interested in helping the public—not restricting it! I have watched for years now as you have spent my hard earned tax dollars blocking me from admission to the forest system. It is an affront I can hardly begin to describe! Go back to the days of well-maintained trails, good forest campgrounds, cable cars across streams, and the green truck the sign of a friend coming to help. You have inherited an agency at the bottom of its historical abyss—you can either turn it around into the proud agency it once was—or you can continue on the present path until some visionary president disbands the agency and replaces it with something new. Barring huge change—I would vote for immediate dismantlement—you are currently doing no one any good, and you cost a hell of a lot of money. Not much of a bargain in my book. (Individual, Missoula, MT - #A5.12120)

**864. Public Concern: The Forest Service should manage National Forest System lands for a wide variety of uses.**

I would say the highest good is the public usage of the land—that means recreation, the national economy and the local businesses. I do not believe using it solely for timber production is correct, but neither is using it solely as a wildlife preserve (for wolves, grizzlies, or owls), nor as a botany preserve (for the old growth), nor as a nostalgic attempt to recreate the west as it was before the white man arrived (or for that matter, before the Indians arrived—after all, they did burn the forest regularly and they did leave a mark on this Eden as some seem to think primitive America was). (Individual, Bozeman, MT - #A59.50200)

**BECAUSE TAXPAYERS HAVE A RIGHT TO USE PUBLIC LAND**

The world is made up of opinions, some of these get more attention due to the size of their budget not by their educated fairness! Too many people throw money at organizations which benefit nothing. The Earth is a fragile, yet not so fragile thing, it has survived many years of changes, many of which our species would not have survived. With that in mind, this land is here to use and use for all. The consideration needs to be given so that the people that fund this land (taxpayers) have rights within these lands. (Individual, No Address - #A426.15100)

These are public lands. Each taxpayer's tax payments bought and maintains these lands. They are not owned by the Forest Service. They should be enjoyed by all. The Forest Service are employees of the public and need to respect our wishes on how to both protect wildlife and utilize these assets. (Individual, No Address - #A457.15110)

**865. Public Concern: The Forest Service should assure consistent decisionmaking for all national forests.**

**BECAUSE THEY ARE ALL A PART OF THE NATIONAL FOREST SYSTEM**

In exercising our stewardship over these forest resources and as supported by the many commenting interests representing all states, we should have a consistent basic regulation for all the national forests. It should not be easier to timber a national forest in Montana than one in Colorado or New York. Those living near a national forest in one state should be entitled to have it protected just as much as those living near another forest in another state. It is only fair and equitable that there should be a “level playing field” so that there will not be any discrimination among the forests. After all, they are all in the same national forest system. (Organization, Birmingham, AL - #A21582.13100)

**866. Public Concern: The Forest Service should use the Sierra Nevada Framework policy as a model for management of the entire public lands system.**

**UNTIL ACTIVE MANAGEMENT IS PROHIBITED**

Again, all of the so called “threats” to our forests have been used as a smoke screen to promote more logging. Why don’t you admit it—government studies have shown logging is the number one activity which increases wildfire danger? Let’s talk about hazardous fuels. What about the thousands of gallons of diesel fuel and atrazine that’s regularly applied to clearcut land throughout the west. Sure that’s on private lands, but what we’re dealing with is this same mentality. If it can be mined, logged, grazed, roaded, or destroyed [then] it must be? The USFS actually has done something positive in the last 100 years, it’s called the Sierra Nevada Framework. This policy should not be undermined as we know is in the works, it should be the model for the entire public lands system. At least until we finally wake up and stop all commercial exploitation of our national forests and public lands. (Organization, Santa Cruz, CA - #A29160.30100)

**867. Public Concern: The Forest Service should adopt a management approach similar to that used to delineate and manage wetlands.**

The Forest Service must adopt an approach similar to that used to delineate and manage wetlands of the United States. The Forest Service must start with clear and up-to-date criteria for the delineation of roadless areas. These criteria should include forest health, wildlife habitat, water quality, scenic values, access to non-federal land, and a variety of recreation opportunities. Once established, these criteria must be applied consistently to all forested lands while balancing the economic and social relationships that directly impact working families and local communities. (Individual, Hibbing, MN - #A21366.13200)

**868. Public Concern: The Forest Service should employ a new “wilderness ethic.”**

**BY EMPHASIZING A LIGHT RESTORATIVE APPROACH TO SUSTAINABLE MANAGEMENT BASED ON INDIGENOUS PRACTICES**

It is time that Americans let go of the Daniel Boone/Davy Crockett/Boy Scout approach of believing our American forest resources are limitless and our divine right to use and abuse. Our “wilderness” ethic needs to be replaced with a new “wilderness ethic” of a light restorative approach to sustainable management based on Return to the Natives (indigenous ways combined with modern science and technology in a ‘light restorative approach using the proper balance of native species and educated human use and appreciation of these areas). (Individual, Watsonville, CA - #A6767.30100)

The Indigenous Americans harvested forest resources and used controlled burns in a sustainable way for thousands of years and created balance with a light human touch. I truly believe that their ancestral history, knowledge and culture can provide “light touch” integrated approach (scientific observation, soft engineering/technology, restorative use, art and spiritual connectivity to the land and lifeblood waters) to management of our national forests. By returning to the Natives (our indigenous cultures and our own ancestral roots) and using native plants and animals in restoration management, we can empower and employ indigenous people and have a sustainable American landscape that President Bush and future Administrations can be proud of and set a world leadership example, so that developing nations do not repeat our same mistakes. (Individual, Watsonville, CA - #A6767.15162)

**869. Public Concern: The Forest Service should be flexible in its management.**

**TO REFLECT CHANGING NEEDS**

The history of the national forests clearly shows continuing change in economic and social needs, objectives, and opportunities, which calls for continuing flexibility in management. There is no reason to

think that we can better predict the future now than we did in times past. (Individual, Olympia, WA - #A811.15100)

**870. Public Concern: The Forest Service should afford local citizens the opportunity to carry out land management activities.**

**BY ALLOWING THEM TO HELP WITH CONTROLLED BURNS AND SALVAGE OPERATIONS**

Controlled burns are a good tool, but only along with free and easy access by caring people. After the fire in Los Alamos in the mid 70s that almost got the labs, the areas opened up to the population for gathering (before rot and insects got in) and there was a wonderful community experience involved and clearing the area of burnt but not destroyed trees. Why did we not do this again. It suggests that we have "Dogs in the Manger" behavior that needs to be stopped. Controlled burns need to be controlled by people with deep intuitive, spiritual, scientific and training in weather, forest behavior, etc. This is where you could have people of exceptional love for the forest caring for it. Not managers and people who just have a job to do. This is so much more important than that! (Individual, No Address - #A5360.30200)

**BY ALLOWING CAREFULLY MANAGED PERSONAL USE TIMBER AND FIREWOOD REMOVAL**

My belief is that, as now, we have to pay \$10 per cord to go into the forest to collect firewood, for instance. The collector can drive up to the biggest pinon tree he sees, stand in front of it and cut it off over two feet from the ground and fell this glorious tree right next to a road. Then the limbs are hacked off, the green tree is cut into big splittable lengths and loaded into the truck, leaving the limbs right there and also the garbage and the bad attitude towards the forest. It is not unusual for me to go up there and have to clean up this spiritual assault, aesthetic assault and very uncool behavior. The people with the permit are not distinguished as to whether they are commercial or not and the forest is not cared for. Let the little guy go in there and be in there with some guidelines that encourage him to take the burden out, not just the big hunks. Then make it easier for him to take that wood home and build something out of it, to use it, to heat his home with it, etc. When we begin this process of everyone tending the forest and not feeling like it is private property, then we make progress. The roads are only bad because of the type of roads we want to avoid. Don't make it so that no roads exist in an area that needs to be tended, and accessed by careful, deliberate, environmentally concerned citizens and caretakers. (Individual, No Address - #A5360.30200)

**871. Public Concern: The Forest Service should enter into non-traditional forms of management agreements.**

**TO BENEFIT LOCAL ECONOMIES AND FOREST HEALTH**

The USFS should enter into non-traditional forms of management agreements. For example, a community manages a forest area in agreement with the USFS; a preservation group pays for the privilege to manage a wilderness area; a forest products company manages a portion of forest land in cooperation with the USFS; the respective state forest departments manage portions of the National Forest, etc. We need more joint ventures based on sound business principles and active stewardship management of the forest resource to create a wealth in the local economies while building a healthy forest environment. We must have both man and forest benefiting. (Individual, Libby, MT - #A10531.15100)

**872. Public Concern: The Forest Service should support the Generational Land Stewards.**

The best way to protect what you term "roadless values" is to not interrupt the Generational Land Stewards from their good works in maintaining that critical standard of diversity of tangible commodities and societal values. Keeping Generational Land Stewards, would also be economically prudent; for to seek out, train, tool up and pay new folks, to attempt doing what a GLS now does for free, would be a huge waste of our dollars! If you have a desire to preserve something really precious, and of real value, I urge you to preserve the Generational Land Stewards! (Individual, La Salle, CO - #A1103.70000)

**873. Public Concern: The Forest Service should pursue tree-planting restoration projects in old neighborhoods.**

When will we start using common sense with Mother Nature? We strip wooded areas to develop neighborhoods and leave old neighborhoods in shambles. Why don't we clear some of these old places and replant trees? (Individual, San Antonio, TX - #A1185.70110)

**874. Public Concern: The Forest Service should consolidate national forests.****SO THAT AREAS OF SIMILAR ECONOMIC, SOCIAL, GEOGRAPHIC, AND VEGETATIVE SYSTEMS ARE ADMINISTERED TOGETHER**

Consolidate national forests so that areas of similar economic, social, geography and vegetative systems are administered by one National Forest headquarters. (Individual, No Address - #A26264.13200)

**875. Public Concern: The Forest Service should either actively manage public lands or relinquish its authority.**

We are disappointed with what we see as an attempt by the USFS to refrain from managing our forests through the increasing creation of land designations that minimize or eliminate management. Perhaps we no longer need a USFS. Our local police could accomplish the goal toward which the USFS is working: lock it up and keep people out. (Individual, Cedaredge, CO - #A10364.12120)

**876. Public Concern: The Forest Service should consider privatization of public lands.**

Privatization of land is key. It results in stewardship and effective management. (Individual, Saint Paul, MN - #A11544.12000)

**AUCTION TO THE HIGHEST BIDDER**

I am opposed to the federal government building roads for private industry to exploit national natural resources, such as forests, mineral deposits, and oil reserves. Why not just liquidate the forest (or other inventory) that the government doesn't want to maintain, by selling it to the highest bidder. Let the winner of the bid build, maintain, and upgrade the roads as they see fit?. Then they will have to maintain their own property, and the government can tax them on it! (Individual, West Lebanon, NH - #A3812.15122)

## Adequacy of Analysis

### Summary

Some respondents assert that the Forest Service did not fully analyze the consequences of the Roadless Area Conservation Rule, and make specific suggestions for additional analysis needed during the current review process. Respondents state that forest health risks associated with eliminating commercial timber removal were not adequately considered. A similar assertion is echoed by others, who assert that the Rule deprives managers of tools that may be appropriate to improve forest health or function in specific places. These respondents state that analysis should be conducted for each roadless area to determine the best management approach. Others suggest that a regional-level analysis is the proper scale on which to evaluate roadless areas. Several respondents believe that potential increases in agency costs for firefighting were not properly evaluated.

**877. Public Concern: The Forest Service should analyze the risks of eliminating timber removal and roading as management tools in roadless areas.**

It is essential that roadless areas be accurately mapped, including those areas at risk of wildfire and insects and disease so that management options can be accurately assessed. In our opinion, the draft environmental impact statement for the previous rule did not adequately address wildfire risk. **(It is imperative that the Forest Service require that the risks and impacts of “doing nothing” be provided as well as an analysis of the risks or impact of roading or other management activities. In the final decision, the standards for no management on federal forest lands should be as any standard for management activities.)** (Association, Fernandina Beach, FL - #A15466.10135)

**878. Public Concern: The Forest Service should compare the value of management activities versus the value of leaving areas roadless.**

**BY USING THE “CHOOSING BY ADVANTAGES” METHOD**

What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates inventoried roadless areas?

First and foremost is a definition of what is worth saving through management and what is classified as worthless and should be left to nature. Roadless areas have little social and economic value to the nation unless they are open to all the nation to use. Preservation is such a false word when defining these lands taken out of production. Preserving what for whom? Again, if you decide that this public land has no value, then keep it roadless. If it has value and is worth saving, then take it out of the roadless areas and manage it for multiple use!!!! (Individual, Montrose, CO - #A370.45100)

Roadless Areas are a conglomerate of lands designated TO NOT BE ROADED. They are not intended, nor for the most part fit in the Wilderness classification. Each Roadless Area needs local review to consider their value and reclassification (in partials) as to those values. When this is done appropriately some areas (within each) may fold out as Wilderness, other areas may prove roadable. From our window, a majority of these areas would remain under Roadless status, but certainly be available for some economical logging. (Individual, Forks, WA - #A877.45100)

Any description of values should attempt to balance characteristics that are enhanced by maintaining an area in a roadless state against: (1) the values that could be achieved through active management, and (2) the risks associated with maintenance of the area in a roadless state. There are any number of instances where construction of a road through a roadless area would result in a net gain to the environment.

For example, if an existing road is located in a sensitive riparian zone, it may be beneficial to relocate such a road to a ridgeline, even if the ridgeline is within the boundaries of an inventoried roadless area. Or, there may be instances where the risk of catastrophic wildfire is high enough that the benefits to be derived from construction of roads necessary to reduce the fuel load and restore the stand to historic conditions will outweigh any impacts caused by road construction. (Governor, State of Idaho - #A20141.45000)

**ON A ROADLESS AREA-BY-ROADLESS AREA BASIS**

We believe public input will identify the important values to be considered when evaluating inventoried roadless areas. Those values are too numerous to list here, but run the gamut from do-nothing to intensive management. The important point is those values will vary from forest to forest and between roadless areas within the same forest. The Forests need only listen closely to the various interests to see what those values are, and keep an open mind by not eliminating those values the Forest does not agree with. WE believe the end result will be that some roadless areas will remain roadless and others will be developed. This analysis must be done on a specific roadless area by roadless area basis, not a top-down, government-knows-best basis. (Elected Official, Saint Anthony ID - #A4942.45100)

**879. Public Concern: The Forest Service should use large scale analysis to provide guidelines in establishing the role of national forests.**

Large scale analysis (such as the ICBEMP), national and regional strategic plans, or a revitalized RPA are appropriate to establish the National Forests' role in providing commodity and non-commodity goods and services. This is valuable input to the individual National Forest planning process; however, these broad scale analysis and/or strategies should never be direction, only guidelines. (Individual, Colfax, WA - #A5421.16000)

**880. Public Concern: The Forest Service should evaluate the impacts of land management decisions with respect to impacts on other public lands in the area.**

Opinions from all concerned individuals and affected government agencies should be solicited and considered in land management decisions, and the consideration of impact should not be limited to the land parcels under review. The impact of land management decisions on any section of Forest Service land must be evaluated with respect to the impact on other public lands in the area. The potential negative impact from overuse of other public lands, especially other USFS and NPS lands, should always be considered before placing additional restrictions on access to public lands in the national forests. (Individual, Crystal River, FL - #A6257.12300)

**881. Public Concern: The Forest Service should consider that reduced road access would increase costs of forest management.**

The costs of fighting wild fires are higher where no roads are available to move men and equipment closer to battle the blazes. (Individual, Rogue River, OR - #A4802.17000)

Areas designated as "roadless" in terms in government expenditure can not be managed for fire and disease except at very high cost, which cost may include the safety of firefighters or the sustainability of growth. If for no other reasons, this proposal should be dropped. (Individual, Salt Lake City, UT - #A806.17100)

## Roadless Areas Management General

### Summary

**General Comments** – Some respondents question the terminology used to distinguish between types of roadless areas, and request that the Forest Service better explain the term "uninventoried." Some assert that this means that these areas have not been evaluated at all, in which case the rationale for including management direction for them in the final rule is illogical.

Among others, a common refrain is that the current review of the Rule is the result of political interference from the new Administration. These respondents specifically ask the Forest Service to base its decisions about the fate of the Rule on science rather than political expediency. There are people who assert that the last Administration was bowing to political pressure in formulating the rule in the first place and say the current review process is appropriate. (See also Chapter 3: Informed Decisionmaking (Question 1): Decisionmaking Authority: *Trust and Integrity*, as well as the discussion of trust and integrity in the Executive Summary.)

**Authority for Roadless Area Management** – A number of respondents question whether or not the Forest Service has statutory authority to manage roadless areas as such under a national rule. These people assert that the Wilderness Act makes no provision for such a de facto wilderness category (see also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Wilderness Acts*, and Chapter 5: Designating Areas (Question 8): *Wilderness*)

Recommendations). Others state that a separate roadless management strategy creates illegal buffer zones around wilderness areas. Some respondents maintain that the Forest Service does have the statutory authority to manage roadless areas to maintain their unroaded character. Some respondents request that as the public debate continues over roadless area management, Congress be left out of the fray to avoid further politicization.

**General Direction of Roadless Area Management** – Citing the prohibition on most timber removal in the Roadless Area Conservation Rule, some respondents ask the Forest Service to cancel all existing timber sale contracts in inventoried roadless areas. There are others who believe that by focusing on road-related issues and prohibiting roadbuilding, the Agency is implicitly rejecting active forest management activities in roadless areas, which may ultimately prove detrimental to forest health. (See also Chapter 6: Protecting Forests (Question 3).)

**882. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule without political interference.**

Citizens have overwhelmingly spoken our wish to keep our roadless areas roadless. Implementation should be the responsibility of professional foresters, acting without the political interference that has characterized this issue from the beginning. (Individual, Lolo, MT - #A111.10160)

I very much hope that you will let stand the Roadless policy it was written in the January 2001 Record of Decision. I hope you will realize that the previous decision itself is a compromise, far from a radical policy. Please do not cave in to political pressures to further develop the current roadless areas. (Individual, Lansdale, PA - #A611.10160)

**BASE MANAGEMENT DECISIONS ONLY ON SCIENCE**

The advent of the George W. Bush administration, with its generally anti-regulatory stance, may indeed be giving the Forest Service some second thoughts about how strong the proposed regulations should be, but science should decide this issue. The recommendations are based on years of thorough study. Court actions by resource extraction corporations are meant only to weaken the protection to public property that is offered by the Rule. This is the reason that our group will tolerate no exemptions or exclusions created to undermine or weaken the Roadless Area Conservation Rule. (Individual, Chico, CA - #A915.10150)

**883. Public Concern: The Forest Service should explain why there are provisions for managing uninventoried roadless areas.**

**BECAUSE IF AREAS ARE UNINVENTORIED, GROUND CONDITIONS AND NEEDED MANAGEMENT IS UNKNOWN**

Why is there a provision for managing “uninventoried roadless areas”? If it is in fact “uninventoried,” then the actual on-the-ground conditions are an unknown and therefore the type of management is also an unknown. Yet under the guidelines there is a broad definition of provision to manage these areas. (Organization, Orofino, ID - #A8393.45420)

*Authority for Roadless Area Management*

**884. Public Concern: The Forest Service should consider that there is no statutory direction for managing areas as roadless.**

The roadless issue started with the Wilderness Act in 1964. The intent of Congress in requesting the inventory is clearly spelled out in Sec. 3(b) of the Act. The values and characteristics to be considered are well defined in Sec. 2(c) of the act. These values have already been well defined by RARE I, RARE II and subsequent Forest Plans. It was the intent of Congress for the inventory to provide recommendations for Wilderness classification by Congress. There is no statutory direction for the

Forest Service to manage areas as roadless. It was not the intent of Congress as expressed in the 1964 act for the inventory to establish special classified areas without management direction. (Individual, Moscow, ID - #A5380.20206)

“Areas without roads have inherent values and characteristics that are becoming scarce in an increasingly developed landscape. While National Forest System inventoried roadless areas represent only about 2 percent of the total landbase of the United States, they provide significant opportunities for dispersed recreation, clean, clear sources of public drinking water, and large undisturbed landscapes that provide privacy and seclusion. In addition, these areas serve as bulwarks against the spread of invasive species and often provide important habitat for rare plant and animal species, support the diversity of native species, and provide opportunities for monitoring and research.” (Forest Service Roadless Web Page, Questions and Answers 2000).

Given such statements, it is difficult to discern how the protected roadless areas created by the January 12 rule would differ in any significant manner from wilderness areas established under the Wilderness Act of 1964. The Forest Service must respect the fact that the overwhelming majority of the roadless areas that are the subject of the ANPR and the January 12 rule were expressly rejected by Congress for Wilderness designation during consideration and passage of 19 separate pieces of legislation. In fact, virtually all areas targeted by this proposed action were specifically left open to mineral location under the Mining Law of 1872, leasing under the Mineral Leasing Act of 1920, mineral material sales, as well as for other multiple-uses, when Congress decided against wilderness designations for these areas pursuant to the Wilderness Act of 1964. Thus, “wilderness values” cannot be applied wholesale and without specific authorization from Congress. (Association, Spokane, WA - #A17351.25100)

#### **BECAUSE IT IS PROHIBITED BY LAW FROM CREATING BUFFER ZONES AROUND WILDERNESS**

In pursuing the ANPR process, the Forest Service must understand that a “national roadless rule” is unnecessary (and probably unlawful) given the existence of the Wilderness Act of 1964. Congress passed the Wilderness Act to establish a National Wilderness Preservation System because several decades of management of the public lands by administrative agencies through designation as “roadless,” “primitive,” “canoe,” “wild,” or “wilderness” areas, resulted in a patchwork administrative scheme for setting aside “wilderness areas” for special protection from multiple-uses. As the House Report accompanying the Act explained:

“A statutory framework for the preservation of wilderness would permit long-range planning and assure that no future administrator could arbitrarily or capriciously either abolish wilderness areas that should be retained or *make wholesale designations of additional areas in which use would be limited*. This committee accordingly endorses the concept of a legislatively authorized wilderness preservation system.” House Report (Interior and Insular Affairs Committee) No. 15338, July 2, 1964, at 3616-17 (emphasis added). . . . Through its express decision not to create buffer zones and instead limiting the special protection for wilderness areas to that area within carefully drawn boundaries, Congress made clear that the remaining lands not designated wilderness were to remain open to multiple uses. (Association, Spokane, WA - #A17351.25100)

The Forest Service traditionally has respected congressional will in regard to management of non-wilderness areas. For example, 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 2320.3(5). The Forest Service must refrain from attempting to create the functional equivalent of congressionally designated wilderness areas in this roadless proposal. In the rulemaking process leading up to the January 12 rule, the Forest Service failed to do this by implicitly incorporating “wilderness values” to create unlawful buffer zones by informally extending congressionally authorized Wilderness Areas. (Association, Spokane, WA - #A17351.25100)

The process of creating “roadless” areas should not be used as an administrative method to circumvent issues with which Congress has dealt but may not have resolved. Congress created the Wilderness Act of 1964 to preserve areas of the country with unique value from man’s impact. Since the date 106 million acres of lands in the U.S. have been designated as “wilderness” by numerous acts of Congress. Congress

did not see fit to create “protected border areas” around or adjacent to the wilderness. The “roadless area conservation” program should not be used to create additional “protected” areas in addition to existing “wilderness areas”. Only Congress should exercise such authority where it deems necessary. (Association, Novato, CA - #A17652.25100)

**885. Public Concern: The Forest Service should clarify that there is statutory direction for managing areas as roadless.**

**THROUGH THE FOREST PLANNING PROCESS**

By law, national forest plans have to evaluate the wilderness potential of roadless areas and make wilderness recommendations to Congress. The Rule would not change that. Regardless of recommendations for wilderness, National Forest plans can also designate roadless areas for continued management as roadless areas. (Individual, Fort Thomas, KY - #A11699.25000)

**886. Public Concern: The Forest Service should not involve Congress in management of roadless areas.**

**BECAUSE INVOLVING CONGRESS POLITICIZES MANAGEMENT**

Based on what I know now, I would avoid the Congress in any way possible. Going to Congress will only serve to remove the management from professionals and make it political. (Individual, Hudsonville, MI - #A4928.25000)

**BECAUSE CONGRESS IS UNABLE TO IDENTIFY WITH THOSE MOST AFFECTED BY ROADLESS DESIGNATIONS**

Local forests should be empowered to close any sections of forest they deem fragile if overuse or abuse occurs. Congress should not be involved in “roadless” areas at all . . . they are unable to experience or interact with the people who are directly affected by such mindless designations as “roadless.” Remember, these forests are maintained by taxes. (Individual, Three Forks, MT - #A697.25120)

*General Direction of Roadless Area Management*

**887. Public Concern: The Forest Service should immediately cancel all planned active management projects in roadless areas.**

American Lands is not confident that these areas will be adequately protected by the Chief’s July directive or through the forest planning process. Nor is it likely that Congress will pass legislation in the very near future to protect all roadless areas as wilderness. With that in mind, the Forest Service should immediately protect all remaining roadless areas under its final rule. All development projects, including timber sales, off road vehicle trails, oil and gas drilling, and other schemes should be immediately cancelled. (Organization, Nevada City, CA - #A4941.25120)

**888. Public Concern: The Forest Service should consider that forest management activities can take place in roadless areas while still preserving roadless area characteristics and values.**

Oil and gas can be extracted from a roadless area in a pipeline and still keep the roadless character of the area if that was determined to be worth the cost. On the forest health side we feel very strongly that we keep the ability to carry out active management and then do just that. If keeping the roadless character of the area is an important value then we certainly have the equipment, expertise, and history to carry out tree removal from roadless areas. Throughout the West helicopters have been used to remove dead and dying trees from roadless areas for 40 years. Almost all of these areas are still roadless, but they are in much better shape than if nothing had been done. The Silver complex fire in Southern Oregon, the Foothills fire in Southern Idaho, and the hundreds of thousands of acres of mountain pine beetle salvage in the California Sierras are prime examples. And the beauty of how this was done is that great social and economic values were realized by doing the right thing for the environment. Today and under

Clinton/Gore rules none of this would be possible and we are a poorer people because of it. So we suggest the USFS go back to true multiple use where environmental, social, and economic values are all considered. We have been stuck on exclusively environmental values for so long we are about to destroy what we all would like to see remain for future generations. (Business, Portland, OR - #A10558.45100)

Roadless areas should not be automatically perceived as a “special place” or even a place with out roads. A major concern is that there is a perception that areas without roads are by definition, wild or wilderness and thus, should not be managed at all. The facts are that many of the inventoried roadless areas actually have roads in them. By focusing solely on the issues of roads or lack of thereof, we are missing the opportunity to consider the potential values of an area that the public may want such as healthy forests and wildlife habitat. These values are attainable through specific activities (management). Determining values desired, therefore becomes important. What is it, exactly that the public wants? It may not be areas totally off limits, but rather areas that provide primitive recreation, semi-primitive recreation, wildlife attributes and healthy forests. Local forest planning can best help to describe the values desired and the activities, which can be used to achieve such values within a specific area. (Association, Atlanta, GA - #A17805.45100)

The ecological, physical, and biological attributes present in a particular place best define the values of the national forests. Roads, trails, or other improvements can improve or maintain these values. In many cases, these facilities are necessary if the values are to persist over time, such as in the case of maintaining certain wildlife habitat or access to reduce hazardous fuels. In addition, many of the inventoried roadless areas are not roadless. They have roads, water developments, transmission lines, and in some cases have been previously agricultural land. (Association, No Address - #A22978.45100)

**889. Public Concern: The Forest Service should use the Black Hills National Forest as a model for managing roadless areas.**

I call your attention to the fine job your agency has done for the last 100 years in the Black Hills National Forest as proof that roads, logging, recreation, wildlife etc. are compatible. Since the first ever U.S.F.S. timber sale there in 1899 when the inventory was 1.5 billion board feet there have been 5 billion board feet harvested and over 5 billion board feet are still standing. An article in the January 2000 Journal Of Forestry reports the forest “now also supporting increased recreation, wildlife, water and other uses”. I have heard of no catastrophic fires on this forest. I challenge you to use this as a model for planning the future of the “roadless areas.” (Individual, Springfield, OR - #A21815.30520)

**890. Public Concern: The Forest Service should not manage roadless areas as if it were the National Park Service.**

The courts have separated the sustained yield and multiple-use mandate of national forests from other Congressional mandates, such as national park management, and have clearly distinguished national forests as being not wholly dedicated to recreational and environmental values. The roadless rule contemplates management akin to that of the National Park Service and has been created from a political basis, rather than by Congressional mandate or, more importantly, scientific necessity. (Professional Society, Anchorage, AK - #A21707.10130)

**891. Public Concern: The Forest Service should turn protection of roadless areas over to the U.S. Department of the Interior.**

I would even ask you to take this action one step further and turn these areas over to the protection of the Interior Department and someday make these areas a “National Wilderness” similar in concept to our National Parks which are so heavily overburdened at this point. (Individual, Estes Park, CO - #A3970.25200)

## Activities (Question 7)

### **Question 7: Describing Activities. Are there specific activities that should be expressly prohibited or expressly allowed for inventoried roadless areas through Forest Plan revisions or amendments?**

This section includes 24 subsections: Activities General; Travel Management General; Road/Trail Construction; Road/Trail/Maintenance/Reconstruction; Road/Trail Closure/Obliteration/Restoration; Natural Resources General; Timber Harvest; Mining, Oil, and Gas Development; Grazing; Utilities; Other Natural Resource Concerns; Recreation General; Motorized Recreation; Motorized Recreation – Off-Road Vehicles; Motorized Recreation – Snowmobiles; Non-Motorized Recreation; Mechanized Recreation; Ski Area Development; Hunting and Fishing; Outfitter-Guides; Equestrian Use; Camping/Shelters/Accommodations/etc.; Special Use Permits; and Other Recreation Concerns.

### **Activities General**

#### **Summary**

**General Comments** – Respondents suggest that the Forest Service manage activities on National Forest System lands by seeking public input regarding which activities should be allowed or prohibited. Other suggestions include using the National Environmental Policy Act process, using existing individual forest plans, and using the Roadless Area Conservation Rule to govern activities in the national forests.

**Adequacy of Analysis** – One respondent recommends specific readings for the Forest Service to research in directing resource management: *Travel Management*, *Bringing People and Places Together* and *The Outdoor Recreation in American Life, A National Assessment of Demand and Supply Trends*.

**Activities** – A number of respondents comment on what activities they say should or should not be allowed in roadless areas. Comment on specific activities are included in the sections to follow. People comment, in general, that the same activities should be permitted in roadless areas that are currently permitted in other areas of National Forest System lands, at least to the extent that current forest management plans allow. Others say the Forest Service should allow currently permitted activities in roadless areas to continue. Some state that a wide variety of activities should be allowed—in designated areas, according to the condition and features of the land, and unless the activities in question are causing environmental damage. Other respondents list a wide array of activities they say should be prohibited or restricted in roadless areas—activities that are harmful to the environment or that present a liability concern, activities that require roads, and activities that cause excessive noise.

## Activity Management General

### **892. Public Concern: The Forest Service should seek public input regarding activities that should be allowed or prohibited.**

The public will identify the activities that should, or should not, occur in roadless areas. Some roadless areas should allow timber harvest and motorized use and others should not. There will not be agreement on all, or possibly any, activities that may occur in a particular roadless area. The agency's job is to provide a fair and balanced apportionment of activities among the different roadless areas on the forest, not an all-one-way approach as the Wasatch-Cache proposes. In other words, some roadless areas will become roaded with a variety of activities consistent with that form of management, while other roadless areas will remain without roads and with activities appropriate for that kind of management. Look to the various publics for input on where those uses should occur and then use common sense to provide some balance of those uses on the forest. (Elected Official, Saint Anthony, ID - #A4942.90000)

### **893. Public Concern: The Forest Service should govern activities through the National Environmental Policy Act process.**

OHV use, mining, grazing, and other special uses should be managed through the normal NEPA process. (Organization, Placerville, CA - #A22653.90000)

### **894. Public Concern: The Forest Service should allow existing individual forest plans to govern activities in roadless areas.**

#### **UNTIL THESE PLANS HAVE BEEN AMENDED OR REVISED**

Specific activities, prohibited or allowed, can only be determined after the determination is made on what the future management will be for the roadless area. This determination has already been made in the existing Forest Plans and this implementation should continue until that planning is amended or revised. Under the existing Forest Plans, roadless area management direction is given, including specific activities that are allowed or prohibited. We cannot see any reason to change this current direction until these plans have been amended or revised under the current NFMA regulations or under the revised NFMA regulations. (Business, Colville, WA - #A3362.90000)

### **895. Public Concern: The Forest Service should use the Roadless Area Conservation Rule to govern which activities should be permitted.**

Describing Activities—The current rule covers this very well and should not be changed. (Individual, Peck, ID - #A1109.90000)

Now, the Bush Administration is moving to stop the rule and its protections. They have asked for public comments regarding their intention to weaken the rule, so harmful activities, such as logging and new coal, gas, oil and other mineral development, could proceed in roadless areas that were protected by the January rule. (Individual, Austin, TX - #A1125.90000)

The rule represents a balanced approach to forest conservation, saving the last 30% of America's wild national forests from logging, mining, and drilling—activities already allowed on most national forest lands. As written, it also adequately addresses issues of fire management, forest health, access, and local input. (Individual, John Day, OR - #A1126.90000)

### **896. Public Concern: The Forest Service should consider the current and historic uses of roadless areas.**

When evaluating Roadless Areas, the Forest Service should consider:

The current and historic uses of the area (is the area used for canoeing, hiking, camping, cross-country skiing, OHV use, etc.). (Individual, Des Moines, IA - #A12587.45500)

Traditional use should score highest in evaluation. (Individual, No address - #A57.70200)

The description of values needs improvement

Land use history should be noted. Some “roadless” areas have roads, some were logged or farmed during the last 200 years, and some have been developed during the last 30 years. Land use history needs to be documented. Roadless is more of a historical designation than an ecological designation. (Individual, No Address - #A17292.45000)

Local planning should use historic usage (past 100 years) as the baseline. . . . If the forest has not been significantly damaged over the past century, the forest should be deemed robust enough to allow the current usage patterns to continue. (Individual, Tustin, CA - #A20777.30110)

### **897. Public Concern: The Forest Service should base land management activities on several established systems.**

#### **RECREATION OPPORTUNITY SPECTRUM, VISUAL QUALITY OBJECTIVES, AND THE ECOLOGICAL CAPACITY OF THE LAND**

Land management activities should be based on established systems: Recreation Opportunity Spectrum, Visual Quality Objectives, and the ecological capacity of the land. (Individual, No Address - #A17292.90000)

### *Adequacy of Analysis*

### **898. Public Concern: The Forest Service should research references about management of resources and public uses.**

#### **TRAVEL MANAGEMENT BRINGING PEOPLE AND PLACES TOGETHER AND THE OUTDOOR RECREATION IN AMERICAN LIFE, A NATIONAL ASSESSMENT OF DEMAND AND SUPPLY TRENDS**

To some degree many of these issues/concerns have been discussed in the past, albeit, with the nuances of nomenclature being used to set the tone in addressing ongoing and future direction of resource management and meeting the needs of the public. Two significant examples of reference recommended for your research are: TRAVEL MANAGEMENT BRINGING PEOPLE AND PLACES TOGETHER, Report of the National Access and Travel Management Strategy Team January, 1992; and the Outdoor Recreation in American Life, A National Assessment of Demand and Supply Trends. (Individual, Evansville, IN - #A19627.90000)

### *Allow Activities*

### **899. Public Concern: The Forest Service should permit a variety of activities in roadless areas.**

Any activities should be permitted in the area that are not specifically prohibited in the document establishing the roadless areas. (Individual, Olympia, WA - #A278.90000)

We support the changes that reduce restrictions on the forests. We would like to see plans that allow more heliskiing, snowmobiling, cross country skiing, and other activities in the same areas. Obviously some areas should be restricted from motorized vehicles but common sense must prevail. (Individual, No Address - #A733.90000)

For all inventoried roadless areas, forest plan revisions or amendments should consider a full range of management alternatives, from active management to wilderness recommendations. If the decision for an areas is to remain roadless, permitted activities should include forest health treatments, watershed

improvement activities, motorized and non-motorized recreation, wildfire suppression, insect and disease treatments, and some improvements not requiring permanent road access. (Association, Concord, NH - #A1050.90000)

#### **IN DESIGNATED AREAS**

All activities should be allowed at some location. This does not mean that ALL activities should be allowed at ALL locations. Smart land management will need to be applied to make the designations. Unique natural beauty sites such as vistas or waterfalls should not be logged and, at the same time, highly productive timber sites should be logged. When there is a conflict over the same site, then some knowledgeable decisions will need to be made and not just blanket designations. Knowledgeable managers are going to have to have some backbone and stick to their decisions. This has not been the case in the past. (Individual, Corvallis, OR - #A1132.90000)

In Southern Oregon, access to BLM and Forest Service lands range from multiple use roads and trails, to areas exclusive to OHV use, to the famous Pacific Crest Trail (hikers-only). This approach has worked very well. As you develop policies in this area, I ask that you would keep all interests in mind. Many OHV enthusiasts are responsible with the outdoors (myself included), and it would be a shame to outright ban this kind of access. For example, my ability to enjoy the outdoors is often limited by my work schedule; my half-day motorcycle rides into the backcountry allow me to enjoy absolutely beautiful landscapes that may take 1-2 days of hiking. This is a precious privilege to me! (Individual, Talent, OR - #A1160.90000)

The full array of recreation opportunities needs to be provided for through differing levels of roads, trails, uses managed for etc. It was apparent under past management trends the NF would be largely made up of areas designated as wilderness and areas consisting of roads and cutover forests. The great challenge and opportunity is to maintain areas in between these 2 extremes. More acres without roads (acres that will continue to be without roads), where non-wilderness types of recreation activities can take place are needed. Uses such as mountain biking, hiking, motorcycling, ATVing, etc should be provided for in settings other than roaded timber producing areas. Describing this in terms of the Recreation Opportunity Spectrum (ROS), more areas of SPNM and SPM need to be protected and managed as such for the long term. The ROS designations need to be allocated in Forest Plans rather than being simply an inventory of current conditions. Designation of the majority of remaining roadless will provide a proper mix of ROS designations on NFs. (Individual, No Address - #A1702.90000)

#### **IN AREAS APROPRIATE TO THE ACTIVITIES**

In general, there shouldn't be any overall forbidden activities, but certainly some limitations based on locale may be appropriate. For example, if an area has dangerous cliffs, then permitting rock-climbing might be reasonable, but having hiking trails or snowmobile trails might pose a threat to human safety. Horses and ORV's should not use areas where there is sandy subsoil in steeply sloping terrain, which might cause undue erosion. Camping or campfires shouldn't be permitted during an especially dry or windy season of the year. Common sense should be the best guide in this part of planning. (Individual, Nashville, TN - #A874.90000)

#### **UNLESS THE ACTIVITIES ARE DAMAGING AN AREA**

There should be no activity out right banned unless it is illegal. I love to sing, you may not like my voice, should I be banned form singing? All activities can usually be allowed if properly managed. Each activity should be fairly evaluated and all attempts should be made to manage each activity with proper design and maintenance. If an acceptable result is not achieved, activity should be stopped and re-evaluated for a reasonable amount of time (6 months or so). Experts should be consulted and advice sought. (Individual, No Address - #A57.90000)

Growth in consumption and population make it inevitable that humankind will increasingly face limits with regard to material uses of natural resources and manipulation of ecosystems, so strong preference should be placed on human desires and activities that minimize our per capita ecological footprint on

wild lands. On all public lands, but especially in remaining roadless areas, ecological footprint analysis should be used to determine which activities have the least environmental impact and most social benefits, with market economic benefits placed secondary to water quality, air quality, wildlife habitat and high quality human powered recreation experiences. (Individual, Corvallis, OR - #A650.90000)

There are no activities that should be prohibited unless that activity can be proven to cause MAJOR damage. (Individual, Mount Hood Parkdale, OR - #A1084.90000)

**900. Public Concern: The Forest Service should not exempt activities listed in a Schedule of Proposed Actions.**

All Projects Must be Reevaluated. Exempting work that is “listed in a schedule of proposed actions” is unacceptable and undermines the policy’s intent. (Organization, Arcata, CA - #A1778.45620)

**901. Public Concern: The Forest Service should permit the same activities in roadless areas that are currently allowed in other areas of National Forest System lands.**

**TO THE EXTENT THAT CURRENT FOREST MANAGEMENT PLANS ALLOW**

“Roadless” areas should be managed no differently than any other area of the forest that is not designated by the Congress as Wilderness. There is absolutely no reason to make the FS manage roadless areas as de facto wilderness or any other special designation. All activities that are permitted within the forest should be allowed within “roadless” areas to the extent that current forest management plans allow. If a concession must be made and the agency is compelled to add yet another restrictive management prescription then prohibit the building of new paved or other all weather roads or upgrading of the primitive roads. Allow the primitive, or “jeep” roads to evolve as use and weather dictate (assuming that there is no significant resource damage as a result). (Individual, El Dorado, KS - #A5117.90100)

**902. Public Concern: The Forest Service should permit currently allowed activities in roadless areas to continue.**

In general, use of the roadless areas should be a continuation of existing use. That is, if grazing is an existing use, it should continue as before and under the same environmental controls. This is a case where “sustainability” should be the guideline. Even limited logging might be considered if it can be done by air and without roads. One use that should not be allowed is mineral extraction since it requires roads and this is not an existing use in a roadless area. The USGS has stated that roadless areas have a small fraction of one per cent of the mineral resources of the country so this is no loss to the country. (Individual, Boulder, CO - #A5250.90110)

**903. Public Concern: The Forest Service should protect local communities from sudden restrictions and bans from activities that had previously been legal.**

What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates inventoried roadless areas? The local community should be protected from sudden restrictions and bans on activities that have previously been legal. (Individual, No Address - #A850.45611)

**904. Public Concern: The Forest Service should allow some people to live by themselves, in roadless areas.**

**IN SMALL NUMBERS**

Human woods-dwellers and squatters must be treated with tolerance. However, if large groups of people begin perpetually inhabiting roadless areas, they must be approached calmly and asked to leave. Hermits and solitude-seekers should not be disturbed, however. (Individual, Olympia, WA - #A25533.90000)

## *Do Not Allow/Restrict Activities*

### **905. Public Concern: The Forest Service should prohibit certain activities in roadless areas.**

Activities that should be prohibited in roadless areas through Forest Plan revisions or amendments are clear cutting, mining, grazing and recreation/resort development. Those activities that should be allowed are low impact, non-motorized recreation. (Individual, Boise, ID - #A674.90000)

Activities prohibited in Roadless Areas should include mining, logging, drilling of any kind, and the increasing threat of ORV traffic. Motorized use for rescue would be ok. (Individual, Memphis, TN - #A1032.90000)

No road building, or off road vehicle travel, logging or mining should be allowed in the roadless areas. (Individual, Elk City, ID - #A1064.90000)

#### **ACTIVITIES THAT ARE HARMFUL TO THE ENVIRONMENT OR THAT PRESENT A LIABILITY CONCERN**

If we allow activities that are inconsistent with the landscape, we will be sacrificing our resources and those of every generation to come for short-term greed. The long-term health of a system is more important than having to deal with a lawsuit from the Snowmobiling Association of America. If you have a sound biological basis for denying an activity, you should not lose in court. Similarly, if you have a solid liability issue for denying an activity, you should not lose in court. For example, if many people using jet skis on public land (water) get hurt and sue the Forest Service, the activity presents a liability concern. Allowing the activity isn't worth accepting the liability attached to it. (Individual, No Address - #A29243.90000)

#### **ACTIVITIES THAT REQUIRE ROADS**

It is pretty clear that activities that do not need a road should be allowed and those that need roads or create roads should be banned. Even administrative use of roads in roadless areas is silly as these areas have been maintained for years before vehicles. (Individual, No Address - #A472.90000)

#### **ACTIVITIES THAT CAUSE EXCESSIVE NOISE**

Roadless areas because of their roadless status, have "managed" themselves quite successfully through natural selection processes which operate independently of human agency. The only management they require is protection from human-introduced degrading influences, such as motorized vehicles, logging, fire, mining and noise or other encroachment. (Individual, Port Angeles, WA - #A6179.30100)

#### **DRUG RELATED ACTIVITIES**

In distinction to many of the radical environmentalists, some of whom are involved with illicit drug cash crops, I believe that illicit drug cash crops should be withheld from these roadless areas. (Individual, Klamath Falls, OR - #A6931.90110)

Excessive amounts of land deemed "roadless" will not be able to be used by most law abiding people but may actually get a lot of usage from illegal aliens, drug smugglers, and in some cases, drug farmers. (Individual, No Address - #A931.90000)

METH labs and dope farms should be prohibited on federal Forestland as it is in all other places. (Individual, Orofino, ID - #A17317.90110)

#### **MILITARY TRAINING**

We feel that the following activities should be expressly prohibited in all roadless areas on FS land: livestock grazing, road building, road maintenance, motorized recreational vehicle use, military leases for training, trapping, commercial mining and herbicide use. (Individual, Nine Mile Falls, WA - #A15241.90110)

### MILITARY TESTING

Activities prohibited: . . . Military bombing ranges. (Individual, No Address - #A28602.90110)

#### 906. Public Concern: The Forest Service should not allow individual forest plans to make exceptions for specific activities.

Although I myself ride an off-road motorcycle, the use of motorcycles should be prohibited in almost all areas except those specifically designated as such. Motorcycles, the two-wheel variety, are never ridden with care and/or consideration for the land or the environment. They leave ruts in the trails, which cause erosion, and the riders have a tendency to make their own trails without any consideration for anything. (Individual, Maricopa, CA - #A3732.90110)

I am writing because I am against any change to the Roadless Area Conservation Rule. The current rule strikes a balance between preserving our remaining wild lands and accommodating competing uses; there is no good reason to change the rule. I particularly oppose allowing individual national forests to opt out of the rule and decide to go back to logging, building roads in, or otherwise developing these pristine wild areas, above all those in Alaska's Tongass rainforest. (Individual, Cleveland, OH - #A4484.90110)

## Travel Management General

### Summary

**Access** – A number of respondents assert that the Forest Service should provide access to roadless areas. One Organization remarks that Forest Service rulemaking must not restrict public access to narrow corridors along a few major roads. They believe this is the current trend and are concerned that forest users will be impacting areas because access is not distributed better. Some state that the Forest Service should not allow the presence of an endangered species to block access to lands; others request that the Agency not penalize the whole population because of the irresponsible actions of a few.

Other respondents assert that the Roadless Area Conservation Rule would have no effect on access. One individual declares that there are so many existing roads to travel, that he does not believe will be closed in the future, that no one should be concerned about be locked out of the forest.

**Adequacy of Analysis** – A number of respondents suggest that the Forest Service should carefully examine and evaluate the entire road system. Specifically, people ask the Agency to evaluate the use of each road to determine which existing roads are needed for effective long-term management, what new roads should be built, and which roads should be obliterated. As part of this analysis, one organization suggests the Forest Service document visitor usage on all forest travelways, and that it use the FS-643 Roads Analysis publication to determine the specific values of each motorized road and trail.

One point of disagreement among respondents is the adequacy of the evaluation of road impacts presented in the Roadless Area Conservation Rule EIS. According to one state agency, that evaluation is flawed inasmuch as most roads in inventoried roadless areas are temporary roads and “the ecological impact of temporary roads or roads closed to the public is significantly different than those used to describe and justify the conclusions reached in the evaluation.” Another respondent states, however, that the original EIS described the impact roads have on the landscape and it is this person's opinion that no one has proven otherwise.

**Funding** – A few individuals discuss funding as it applies to travelways in general. These respondents suggest that the Forest Service increase the budget to fix the road system, allocate funds according to specific road priority, not charge fees for road use, and request funding to support trail programs.

**Travelways** – Some respondents say the Forest Service should remember the purpose of the national forest transportation system—that is, to “support management activities and access needs into the foreseeable future.” One Organization states that the Agency should base road management decisions on the individual merits of each travelway inasmuch as “the cumulative effect of not analyzing each road and trail segment is tremendous.” This same organization also recommends that the Forest Service establish a multiple use review board to guide travel management decisions. On the other hand, at least one individual asserts that dirt roads and trails should be allowed “without the government being involved with or being held accountable in any way shape or form.”

**Roads** – A number of respondents state that the Forest Service should work with states and respect their authority with regard to road management decisions. One state agency, for example, states that the Forest Service should incorporate management direction for public roads which are under the jurisdiction of local governments. According to others—the Forest Service should give due consideration to the position of local authorities regarding road rights; should respect states’ section line laws; should address roads which appear on older system maps, roads which are of local importance, and Revised Statute 2477 rights of way (see also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Revised Statute 2477*); and should acknowledge the existence of every access road. An Organization states that the Forest Service should not imply there are more roads than there actually are.

Other respondents think that the Forest Service should acknowledge that the Roadless Area Conservation Rule would not close roads or prevent the construction of new roads in already roaded areas; should approve the location of roads at the national level following proposals from local authorities; and should place the burden of proof for justifying road construction on those proposing roads.

**Trails** – General comments regarding trails include the request that the Forest Service explain how trail rules work with a roadless designation; the suggestion to rotate trails in roadless areas in order to prevent resource damage; and the claim that the Agency should stop turning existing trails into roads inasmuch as “roadless national forest trails should be restored to their traditional uses and purposes as foot and horse trails, not motor vehicle speedways.” One respondent suggests eliminating specific trail width rules, while others suggest that the width rules protect trails from off-road vehicle damage. Finally, one Organization asks the Forest Service to recognize that trails which are not authorized through a public planning process are illegal.

## Access

### **907. Public Concern: The Forest Service should provide access to roadless areas.**

#### **BEYOND NARROW CORRIDORS ALONG A FEW MAJOR ROADS**

Forest Service rulemaking must avoid restricting public access to narrow corridors along a few major roads. The current trend to restrict public access to narrow corridors in the forest will concentrate over 90% of the forest visitors to less than 10% of the forest area. This trend is occurring in all of our

National Forests. The cumulative impact from concentrating forest visitors to narrow corridors is not reasonable management of our public lands and access to our public lands. The document must evaluate the cumulative impacts from management goals that concentrate visitors and eliminate dispersed recreation opportunities including, impacts to quality of recreation, diversity of recreation, equal allocation of recreation opportunities, wildlife, trails, erosion, vegetation, and reduced recreation opportunities for motorized visitors. (Organization, Helena, MT - #A13226.90000)

#### TO THE BOUNDARIES OF ROADLESS AREAS

Please provide public access TO THE BOUNDARIES of roadless areas at about 5-mile intervals. (Individual, Billings, MT - #A7295.91110)

### 908. Public Concern: The Forest Service should not allow the presence of an endangered species to block access to lands.

If GAG [Green Advocacy Group] determines that a 5000-acre parcel of land contains some variant of plant/animal sub-species classified or “classifiable” and “endangered” by the ESA, the 5000-acre number meets the requirements for a wilderness designation. But let’s also say that there is a road running through the center of the parcel leading to something like a privately owned camp. By the presence of supposedly endangered sub-species, the green groups can effectively close off access to the road by claiming that the presence of the road and the traffic it generates are a threat to the plant/animal in question. Once the ESA has been used to close the road and deny access to the private property, the greens can then lobby to have the area declared a “Wilderness Area.” Since the road no longer technically “exists,” it and the land surrounding it are permanently taken out of any meaningful public usage. By the time all the complaints are filed, lawsuits are prepared, pickets are organized, and propaganda is distributed, nearly everyone involved will have forgotten one very important point. It was the ESA that effectively “created” the endangered sub-species where none existed before. This led to the loss of access to both private and public property, and the ultimate designation of a wilderness area that would not have met the requirements for such on its own merits. (Individual, Jefferson, OR - #A775.25100)

By eliminating vast areas from public access to purportedly protect some endangered species is just a subterfuge for controlling and re-engineering citizens’ life styles. This goal of the radical environmentalists disregards the rights of the individual which is an American tradition. (Individual, Crescent City, CA - #A6097.50000)

### 909. Public Concern: The Forest Service should prohibit new road construction and regulate commercial ventures, but continue to allow access on existing routes.

What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates inventoried roadless areas?

Roadless should mean the desire to keep an area free from roads, not a goal to remove roads from an area that already has them. I see no conflict with public access for recreational purposes and wilderness designations, even if the access includes motorized vehicles. I frequent routes in our National Forests that have been in place in excess of 125 years (I have adopted such a route, 3N02, Burnt Flats Trail, in the San Bernardino National Forest in California) and there is no indication of habitat destruction, let alone damage to the habitat, as a result of vehicular access to these routes. If an area is defined as Roadless, yet there are already routes established, then the Roadless Designation should mean that no new routes be established, and heightened regulation of commercial ventures should take place. But, in no case should recreational access be restricted from existing routes in our National Forests and Parks. (Individual, Murrieta, CA - #A367.45523)

**910. Public Concern: The Forest Service should not penalize the whole population because of the irresponsible actions of a few.**

There are a small handful of people who deliberately destroy public property and lands. Please don't penalize all of us for their actions. Let the fines be steep for those who leave designated trails and unattended fires or destroy habitat. We have gotten completely out of control by allowing people to shrug off responsibility. Make people responsible for their own actions. If the coffee is hot and it burns the person who bought it, it is an accident not a liability. Please do not restrict access to our mountains. They are our backyards. There are millions of acres that are inaccessible to motorized vehicles. These areas have no roads and no sign of human intervention. It is impossible for anyone to access these areas. (Individual, Spring City, UT - #A833.10130)

**911. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule does not affect access.**

I certainly will not have time to travel the existing system of roads during my lifetime. None of these existing roads would be closed as a result of the Roadless Rule, and Coloradoans would continue to have access to these lands as well as access to private and State-owned lands. (Individual, Aspen, CO - #A5119.10111)

I ride an off-road motorcycle and enjoy hiking. I would like to see the government maintain roadless areas. I believe we have enough areas for public access where we can ride, walk, etc. (Individual, No Address - #A796.10150)

There are already enough millions of miles of access roads in our National Forests. Please do all that you can to maintain the Roadless Area Conservation Rule. It is the best thing for our country now and into the future. (Individual, Bayside, CA - #A12071.10111)

**TO ALASKA'S NATIONAL FORESTS, BECAUSE THERE IS UNIQUE MARINE ACCESS**

Some critics of applying the roadless policy to Alaska's forests have suggested this will prevent public access to forest resources for recreation and tourism. Both of Alaska's national forests, however, encompass an unusual system of coastal islands and fiords that provide unique marine access ranging from kayaks and small boats to the Alaskan ferries and major cruise ships. The Seward Scenic Byway and Alaska Railroad bisect the Chugach National Forest and provide additional access for many different activities. With marine access, including the Alaska Marine Highway System, and the existing highways, roads, railroad, and trail system, both of Alaska's national forests offer substantial access for recreation, tourism, and local resource users, including subsistence. Not only does this provide reasonable access, it offers unique opportunities that will attract national and international visitors to our state for experiences that are becoming increasingly rare elsewhere throughout the world. (Organization, Anchorage, AK - #A22992.40000)

***Adequacy of Analysis*****912. Public Concern: The Forest Service should document visitor usage on forest travelways.**

Comments and concerns expressed by motorized visitors indicate that the current allocation of recreation opportunities is not balanced. During the preparation of the environmental document, the Forest Service must count and classify visitors using the forest travelways. Our observations show that these travelways are frequently visited by hundreds of motorized visitors. We see very few non-motorized recreationists on multiple-use lands. We see very few vehicles parked at hiking trailheads leading to thousands of acres closed to motorized visitors.

The Forest Service must also interview motorized visitors on these travelways. Interviews will document that these travelways are very important to motorized visitors and that these visitors are concerned about

the declining availability of motorized recreation and access opportunities in the National Forest. (Organization, Helena, MT - #A13226.15152)

**913. Public Concern: The Forest Service should use the FS-643 Roads Analysis publication.**

**TO DETERMINE THE SPECIFIC VALUES OF EACH MOTORIZED ROAD AND TRAIL**

A science-based approach to the analysis of forest roads is presented in the Forest Service publication FS-643 Roads Analysis which was published in August 1999. This document must be used in this evaluation to determine the specific values of each motorized road and trail. This document includes a comprehensive overview of considerations and issues, suggested informational needs and sources, and analytical tools that must be evaluated during the analysis of forest roads. Many of the considerations and issues presented in FS-643, if evaluated adequately and fairly, would support keeping primitive roads and trails in the project area open for motorized recreation, handicapped, elderly, and physically impaired.

The rulemaking process must make full use of FS-643 Roads Analysis Manual in order to properly account for the social, economic, cultural, and traditional values that motorized roads and trails provide to the public. FS-643 must be used on every road and trail segment in order to properly identify and evaluate the needs of motorized visitors and in order to avoid contributing to additional cumulative impacts to motorized visitors. (Organization, Helena, MT - #A13226.16110)

**914. Public Concern: The Forest Service should consider the impacts of roads described in "Conservation Biology."**

As you consider the Rule, I urge you to read about impacts of roads described by Trombulak et al. 2000 in *Conservation Biology*. (Individual, Bellingham, WA - #A16218.14500)

**915. Public Concern: The Forest Service should carefully examine and evaluate the entire road system.**

**FOR EFFECTIVE LONG-TERM MANAGEMENT**

Obviously there are roads that serve no purpose. Modern logging equipment, for example, doesn't require the road densities that older equipment did. We would hope that you would carefully examine and evaluate the entire road system and determine what existing roads are needed for effective long-term management. What new roads should be built and what roads should be obliterated. Now would seem a prudent time to do that in conjunction with roadless area disposition decisions. (Individual, Lewiston, ID - #A2872.45100)

**BY EVALUATING THE USE OF EACH ROAD**

It is WRONG to evaluate roadless areas, as no National Forests are without roads. It should be thought of from a new direction: Where there is some distance between roads (this will vary from place to place), what will best benefit the nation? Will utilizing the resource be it? If so, more roads may be absolutely necessary. However, all roads do not have to be open for all people at all times. Use whatever roads that are necessary to manage the area. Roads may in fact not be needed until some point in the distant future. (Individual, Aloha, OR - #A3675.45000)

**TO DETERMINE WHICH EXISTING ROADS ARE NEEDED FOR EFFECTIVE LONG-TERM MANAGEMENT, WHAT NEW ROADS SHOULD BE BUILT, AND WHICH ROADS SHOULD BE OBLITERATED**

Roads that compose the National Forest transportation system were built and placed to support management activities and access needs into the foreseeable future. They represent a tremendous investment and serve us well. However, it seems that Forest Service leadership has forgotten the purpose of this system. The past Assistant Secretary of Agriculture, when asked by a reporter why all these roads had been built, said he had no idea. He then cited irrelevant comparisons of the mileage of national forest roads and the interstate system. Soon after the interview the agency embarked on an aggressive program to obliterate and decommission as many miles of road as they could in the time left for the

administration. Timber sales at one time maintained the lion's share of these roads, but when these disappeared funding was not requested to take up the slack. The lack of funding was then cited as the reason for obliterating the roads.

Obviously there are roads that serve no purpose. Modern logging equipment, for example, doesn't require the road densities that older equipment did. We would hope that you would carefully examine and evaluate the entire road system and determine what existing roads are needed for effective long-term management, what new roads should be built and what roads should be obliterated. Now would seem a prudent time to do that in conjunction with roadless area disposition decisions. (Individual, Cloquet, MN - #A8272.45500)

#### **TO DETERMINE THE ENVIRONMENTAL EFFECTS OF THE ROUTES IN THEIR CURRENT CONDITIONS**

Require an analysis of all existing routes to determine the environmental effects of the routes in their current conditions.

Once the inventory discussed above is completed, it will be necessary to evaluate the existing routes to ensure compliance with environmental laws and regulations. In some cases, routes that exist and are being used are resulting in unacceptable environmental impacts. These routes will need to be relocated or repaired to ensure that the impacts are reduced to an acceptable level. This evaluation would identify the actions that are necessary to accomplish this objective. (Organization, Salt Lake City, UT - #A12009.45524)

#### **THROUGH INDIVIDUAL FOREST PLANS**

Every forest has a plan. This should describe the project roading during the plan's life and reveal the total road system projected, including roads into unroaded parts of the forest. If it doesn't, that's a plan flaw that needs correction. (Professional Society, Saint Leonard, MD - #A9040.90000)

#### **IN NORTH DAKOTA**

One of the major issues regarding proposed wilderness and now roadless conservation areas in North Dakota is the fact that these areas have extensive road systems. This fact was acknowledged in the 1987 Custer Forest Plan. *See* Custer FEIS, Appendix C. The 1999 draft plan revision, which preceded the roadless rulemaking by a few months, omits any enumeration of roads, although these roads still exist. The 2001 DPG FEIS does not address the specific comments made about each unit, especially the roads found throughout these units. The Forest Service only counted state highways and forest development roads, thus omitting the roads under dispute as well as private easements.

The ANPR does not correct this failure because it assumes that all of these roadless conservation areas are in fact roadless. Unless and until the Forest Service addresses this issue, no amount of process will undo the harm to North Dakota communities and governmental interests. (Organization, Denver, CO - #A21358.45520)

### **916. Public Concern: The Forest Service should recognize that the evaluation of road impacts in the Roadless Area Conservation Rule is flawed.**

#### **BECAUSE MOST ROADS IN ROADLESS AREAS ARE TEMPORARY ROADS**

The Environmental Impact Statement (EIS) developed for this proposal is flawed in its evaluation of road impacts. In most cases the roads identified as having significant impacts are unrestricted access permanent year-round graveled or paved roads. However, most of the roads currently found in Inventoried Roadless Areas (IRA), particularly in the Lake States National Forests, are temporary and/or closed to public access. The ecological impact of temporary roads or roads closed to the public is significantly different than those used to describe and justify the conclusions reached in the evaluation. (State Agency Madison, WI - #A28775.90120)

### **917. Public Concern: The Forest Service should consider that the analysis on road impacts in the Roadless Area Conservation Rule is adequate.**

The original EIS thoroughly described the impact roads have on the landscape in its broadest sense. To my knowledge, no one has shown serious flaws in the analysis. Those impacts will not change just

because the timber and mining industries want to continue business as usual. The Forest Service has a duty to protect the land and water for a variety of uses. The original Roadless Rule did just that. The government should implement the rule without delay. (Individual, Marquette, MI - #A22634.10150)

**918. Public Concern: The Forest Service should compare the effects of roads with other less intrusive access and recognize the basic principles of ecology.**

Arguments for reopening the Roadless rule have complained about the limited management practices for improving forest health (fire suppression, pest infestations, etc). This argument neglects to compare the effects of roads with other less intrusive access and fails to recognize basic principles of ecology. Roads do not improve the health of ecosystems. The existing Roadless Rule Policy should not be altered. The existing rule should be implemented immediately. (Individual, Juneau, AK - #A11676.10150)

**919. Public Concern: The Forest Service should address benefits to the Appalachian National Scenic Trail.**

**FOR ROADLESS AREAS IN THE VICINITY OF THE TRAIL**

Direct and indirect benefits to the Appalachian National Scenic Trail should be addressed for those roadless areas in the vicinity of the Trail. (Organization, Harpers Ferry, WV - #A21737.45621)

**920. Public Concern: The Forest Service should ensure that if an illegally created route is to be reclassified as a trail, it must first undergo site-specific, National Environmental Policy Act analysis.**

**TO GAIN CLASSIFIED STATUS UNDER THE TRAIL SYSTEM**

. . . if the person mapping classified and unclassified travelways as part of the Road Management Strategy determines that the route should be reclassified as a trail (motorized or non-motorized), and if that travelway has been illegally constructed or maintained, it still must go through site-specific NEPA analysis to gain "classified" status under the trail system. While construction and reconstruction of trails is listed as a categorical exclusion, user-created travelways violate 36 CFR 261.10(a) as stated above, because they have gone through no planning, making them technically illegal. (Organization, Missoula, MT - #A21359.90420)

## *Funding*

**921. Public Concern: The Forest Service should increase the budget to fix the road system, restore degraded areas, and impose much stricter standards on any new road construction in the Tongass National Forest.**

**IF THE TONGASS NATIONAL FOREST IS EXEMPTED FROM A NATIONAL ROADLESS RULE**

Southeast Alaska stands to benefit the least from continued entry into roadless areas and benefit the most from a permanent suspension of road building. Saving the roadless areas on the Tongass will result in preserving the best lands this country has left. If our powerful Congressional delegation wins out for a few special interests and the Tongass is exempted, the budget to fix the road system and restore degraded areas should be increased dramatically and much stricter standards imposed on any new road building. (Individual, Juneau, AK - #A23242.45623)

**922. Public Concern: The Forest Service should allocate funds according to specific road priority.**

I think that the Forest Service budget should prioritize roads that need maintenance first, then decommissioning unneeded roads (without limiting access in the future), and then if funds are available, build new roads. (Individual, North Bend, OR - #A30657.17240)

**923. Public Concern: The Forest Service should not charge fees for road use.**

Do not charge for road use. (Individual, Cody, WY - #A18367.90110)

**924. Public Concern: The Forest Service should request funding to support trail programs.**

Please ask for funds to adequately support the Forest Service's recreation and trail programs. For many years the Forest Service has said they support recreation but they have NOT asked for the appropriated monies to do so. "On the ground monies" have decreased for the last 3 years, while money for various other plans has increased! Please ASK for more money for field level staff and projects. (Individual, Livermore, CA - #A23445.91211)

### *Travelways*

**925. Public Concern: The Forest Service should remember the purpose of the national forest transportation system.****TO SUPPORT MANAGEMENT ACTIVITIES AND ACCESS NEEDS INTO THE FORESEEABLE FUTURE**

Roads that compose the National Forest transportation system were built and placed to support management activities and access needs into the foreseeable future. They represent a tremendous investment and serve us well. However, it seems that Forest Service leadership has forgotten the purpose of this system. The past Assistant Secretary of Agriculture, when asked by a reporter why all these roads had been built, said he had no idea. He then cited irrelevant comparisons of the mileage of national forest roads and the interstate system. Soon after the interview the agency embarked on an aggressive program to obliterate and decommission as many miles of road as they could in the time left for the administration. Timber sales at one time maintained the lion's share of these roads, but when these disappeared funding was not requested to take up the slack. The lack of funding was then cited as the reason for obliterating the roads. (Individual, Boise, ID - #A5165.16110)

**926. Public Concern: The Forest Service should base road management decisions on the individual merits of each travelway.****BECAUSE THE CUMULATIVE EFFECTS OF NOT ANALYZING EACH ROAD AND TRAIL ARE SIGNIFICANT**

We are concerned about the way that area closure is approached during the planning process. Past actions have closed many roads and trails to motorized recreation and access without addressing the merits of each one. Justification has included reasons such as ghost roads, user created roads etc. that are not site specific and do not amount to adequate justification. The fact is that many forest roads and trails in use today have been created by forest users going back to the early days of history when all of the forest was "open" to motorized access. The Forest Service cannot select which roads are useful to keep and which are not without a site-specific analysis. The cumulative effect of not analyzing each road and trail segment is tremendous. The decision-making must be based on the individual merits of each travelway. (Organization, Helena, MT - #A13226.45440)

**927. Public Concern: The Forest Service should establish a multiple use review board to guide travel management decisions.**

Motorized recreationists are concerned that a reasonable alternative will not be adequately addressed in the environmental document and decision-making. To prevent this from happening, we request a Multiple-Use Review Board be established to assure that the decision-making reflects the multiple-use management goals and the needs of the public. We request that a Multiple-Use Review Board look into all past travel management decisions in the National Forest to determine whether all decisions have adequately considered the needs of multiple-use and motorized recreationists. Where decisions have not adequately considered the needs of multiple-use and motorized recreationists, we request that the reasons be identified and that corrective actions be taken. (Organization, Helena, MT - #A13226.50200)

**928. Public Concern: The Forest Service should allow only temporary access ways in roadless areas.**

**WHICH ARE OBLITERATED WITHIN A YEAR OF CONSTRUCTION**

No developed roads should be allowed in any roadless area for any reason. Temporary access ways, obliterated within the year, would be permissible when created for certain limited purposes. Activities dependent upon road building would be consequently, prohibited. (Individual, Pendleton, OR - #A30482.90110)

**929. Public Concern: The Forest Service should not be responsible for road and trail management.**

I do not believe in keeping the roadless areas roadless. I believe in dirt roads and trails without the government being involved with or being held accountable in any way shape or form. (Individual, Pittsgrove, NJ - #A8198.90410)

**930. Public Concern: The Forest Service should make parking areas available.**

Make parking areas available. (Individual, Carlisle, PA - #A11410.90000)

*Roads*

**931. Public Concern: The Forest Service should incorporate management directions for public roads which are under the jurisdiction of local governments.**

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 Attorney, Grant County, OR - #A17667.45512)

**932. Public Concern: The Forest Service should give due consideration to the position of local authorities regarding road rights.**

As the comments filed with respect to the Draft Plan Revision and the roadless regulations show, the Forest Service needs to accept information instead of discarding it because it is contrary to policy or the Forest Service “disagrees.” In the context of the road issue, the Forest Service represents these areas as roadless on the basis that the agency does not agree with the position of the state of North Dakota that the section line laws and pre-existing easements must be acknowledged. Absent a court determination, the North Dakota Attorney General opinion is entitled to far greater deference than a Forest Service letter saying the agency does not agree. The Forest Service is not authorized to adjudicate road rights. (Organization, Denver, CO - #A21358.10135)

**933. Public Concern: The Forest Service should respect states’ section line laws.**

**NORTH DAKOTA’S LAWS**

At the beginning of the North Dakota forest plan revision process; the Forest Service presented the North Dakota counties with a “demand” for all roads and easements claimed by the counties. This demand was not only unreasonable and expensive but ran counter to the presumptions in North Dakota law that the counties need not prove existing public roads. The counties declined to spend scarce county funds on a massive title search but invited the Forest Service to conduct its own search. To date, the Forest Service has not done so, implicitly admitting that the undertaking is expensive and time-consuming.

The problem was only exacerbated by the Forest Service moratorium on R.S. 2477 roads and its official position that the North Dakota Section line law does not apply to lands owned by the United States. The problem reached the point where McKenzie County state's Attorney asked for an opinion from the state attorney general on this issue. The Attorney General concluded that North Dakota Section Line law does apply and further that the case law incorporating R.S. 2477 principles also extends those rights-of-way to the National Grasslands. The Forest Service has chosen to "disagree" and uses its disagreement to ignore all of the county public roads, especially in the context of the roadless issue.

Thus, the Forest Service approach polarizes the issue and excludes valuable information from its internal record. (Elected Official, Watford City, ND - #A27737.45400)

**934. Public Concern: The Forest Service should address roads which appear on older system maps, roads which are of local importance, and Revised Statute 2477 rights-of-way.**

Roadless proposal ignores roadless definition of 1964 wilderness Act and RS2477 rights-of-ways. The USFS administration interpretation of roadless areas as it has been used to identify "roadless areas" is contrary to the 1964 definition of a road and RS2477 rights-of-ways. This definition will perhaps one day be the subject of a case the Supreme Court may hear. USFS personnel in public informational meetings frequently define many existing roads in "roadless" areas as "illegal" or "unauthorized" roads. Some of the roads are recent and unauthorized, but many of these roads have existed for several decades and some predated the creation of the national forest system. We suggest that the real roadless areas are much less than those presently identified. True roadless areas are generally well deserving of the name and should be designated as such, but much of the so called "roadless areas" have significant roaded areas that don't appear on recent USFS "systems" maps. Roads appearing on older system maps, those of local importance and RD2477 rights of ways issues are yet to be resolved. It is not appropriate for the roadless proposal to ignore these outstanding issues. (Professional Society, No Address - #A27584.20200)

**935. Public Concern: The Forest Service should acknowledge the existence of every access road.**

The "Roadless initiative" does not even acknowledge the existence of more than 70% of existing access roads thereby eliminating them. (Individual, Reno, NV - #A1108.45100)

**936. Public Concern: The Forest Service should not imply there are more roads than there are.**

The agency must make a commitment to the public to be unbiased in its decision making and reporting.

Example (1): Under the former administration the Forest Service wrote, "The current national forest road system includes 380,000 miles of road, enough road to circle the globe more than 15 time" [Footnote 18: 64 Fed. Reg. 56306] (making it sound like there is an extraordinarily amount of roads). However, the agency failed to make their balancing statements such as, "roads comprise less than 2% of the total National Forest System [Footnote 19: 1 mile = 5,280 feet x 100 feet (width of impact) = 528,000 square feet. 528,000 sq. feet divided by 43,560 sq. feet (1 acre) = 12.12 acres. Therefore, 1 mile of 100-foot wide road impacts 12.12 acres of land. There are 380,000 miles of roads in the National Forest System (see 64 Fed. Reg. 56306). 380,000 miles of roads impact 4.6 million acres (380,000 x 12.12 = 4.6 million). There are a total of 192 million acres in the National Forest System (See Roadless Area Conservation FEIS, p. A4). 4.6 million acres divided by 192 million acres = 2.19% 625 miles of roads could be maintained as Level 2, high-clearance roads, for 834 years for the same cost of fighting wildfires for one year! [Footnote 27: Coghlan, G.; Sowa, R. 1998. National Forest Road System Use (draft). Engineering staff, USDA Forest Service, p. 13. Average cost to maintain a Level 2 road is \$100.00/mile/year. [www.fs.fed.us/new/roads/roadsummary.pdf](http://www.fs.fed.us/new/roads/roadsummary.pdf) 625 miles of road x \$100.00 x 834 years = \$52.125 million]. (Organization, Chesapeake, VA - #A11804.10141)

**937. Public Concern: The Forest Service should consider temporary/short-term roads for non-timber management objectives.**

**SUCH AS WILDLIFE HABITAT IMPROVEMENT PROJECTS, FUEL TREATMENTS, PREVENTATIVE TREATMENTS FOR INSECT AND DISEASE PROBLEMS, ETC.**

A piece that was sorely missing from the previous effort was options that included temporary/short-term roads for non-timber management objectives, such as wildlife habitat improvement projects, fuel treatments, preventative treatments for insect and disease problems, etc. These kinds of considerations are very difficult to address at a national level. (Individual, Missoula, MT - #A28297.13213)

**938. Public Concern: The Forest Service should acknowledge that the Roadless Area Conservation Rule does not close roads or prevent the construction of new roads in already roaded areas.**

This policy actually has a bigger bark than bite, as it will not entail the closure of existing roads or prevent the construction of new roads in already roaded areas. Most eastern forests will be virtually unaffected. Unfortunately, the small minority of Americans opposed to this plan are misstating the issues. (Individual, Syracuse, NY - #A1333.45100)

**939. Public Concern: The Forest Service should approve the location of roads at the national level.**

**FOLLOWING PROPOSALS FROM LOCAL AUTHORITIES**

Ultimately the location of roads will be proposed by local authorities and approved at the national level. This allows for the views of the States, tribes, local communities, and other organizations to be heard. This also disallows for bias at the local level. For example, if the local communities are primarily loggers, then the local authorities cannot be paid off to fight for the loggers' views. Although their views will be heard, the final decision will not be made at the local level. The checks and balances system will be implemented. (Individual, No Address - #A28579.13130)

**940. Public Concern: The Forest Service should place the burden of proof on those proposing roads as roadless areas are evaluated.**

As roadless areas are evaluated, the burden of proof should be on these proposing roads—established as the default as opposed to, for example, wilderness designation where the burden of proof is on the wilderness advocates and non-wilderness the default. (Individual, Spokane, WA - #A20648.45100)

*Trails*

**941. Public Concern: The Forest Service should explain how trail rules work with roadless designation.**

I'd like to see more focus on trails within Roadless areas, and how the Trails rules work with Roadless. (Individual, Meridian, ID - #A1683.45500)

**942. Public Concern: The Forest Service should rotate trails in roadless areas.**

**TO PREVENT RESOURCE DAMAGE**

Trails in roadless areas should be rotated. Much has been said about resource damage due to trails but I view trails as I view a living document. Its course and path should change gradually over time. This gives the trail time to heal and attain different qualities. (Individual, Palmer Lake, CO - #A23361.90410)

**943. Public Concern: The Forest Service should stop turning existing trails into roads.**

**TO RESTORE TRADITIONAL USES**

Forest planning should fulfill the agency's long-neglected duties under 36 CFR 295 to determine which specific areas or trails are appropriate, if any, for off-road vehicle traffic. To this end, MWA members [suggest]:

Stop churning trails into roads. Roadless national forest trails should be restored to their traditional uses and purposes as foot and horse trails, not motor vehicle speedways. (Organization, Helena, MT - #A21370.90421)

**944. Public Concern: The Forest Service should eliminate the 50-inch trail rule.**

We think the roadless rule should be implemented with the elimination of the so-called 50-inch trail rule. . . . (Organization, Brookport, IL - #A30260.91221)

**945. Public Concern: The Forest Service should reconsider its elimination of the 40-inch rule.**

**AND RESTORE TRADITIONAL TRAILS THAT HAVE BEEN DAMAGED BY OFF-ROAD VEHICLES**

Page 3 of the ANPR erroneously states that:

“Previously, the long-standing process employed by the Forest Service for all resource management decisions relied on amendments and revisions to the forest plans, governed by the National Forest Management Act. This is a highly collaborative process involving local regional and national interests.”

This is not true. On June 25, 1990, the USDA-Forest Service published a federal register notice eliminating the long-standing “forty-inch rule” which protected national forest trails by prohibiting vehicles wider than 40 inches—such as ATVs—from driving on all national forest trails. This rule was considered crucial by field staff to maintain the distinction between roads and trails.

It was eliminated without amending forest plans, at the behest of ATV manufacturers wishing to expand sales of ATVs by selling them as “trail vehicles.”

The administrative record shows this change was vigorously opposed by USFS field staff that correctly predicted disastrous consequences from opening trails up to ATVs. No effort was made to involve the public in the three page EA which supposedly justified this national mistake, nor is there any evidence that a single non-motorized, hunting, hiking, horseback or outdoor club was ever contacted before this change was foisted on the American people.

The U.S. Forest Service should clean up this mess and restore traditional trails that have been subsequently damaged by ATV traffic. (Organization, Helena, MT - #A21370.91221)

**946. Public Concern: The Forest Service should recognize that trails which are not authorized through a public planning process are illegal.**

Forest planning should fulfill the agency's long-neglected duties under 36 CFR 295 to determine which specific areas or trails are appropriate, if any, for off-road vehicle traffic. To this end, MWA members [suggest]:

Vehicle routes that were never authorized through a public planning process should be recognized for what they are: illegal scars and vandalism. (Organization, Helena, MT - #A21370.45500)

## Road/Trail Construction

### Summary

**General Comments** – The most common general comment regarding road/trail construction is that the Forest Service should construct and maintain an adequate system of roads and trails—as required by the Multiple Use and Sustained Yield Act (see also Chapter 2: Other Legal

Concerns: Federal Laws, Acts, and Policies: *Multiple Use and Sustained Yield Act*, and Chapter 4: Environmental Values: Management: *Multiple Use Management, Allow Multiple Use Management, and Do Not Allow/Reconsider Multiple Use Management*).

**Funding** – Some individuals state that the Forest Service has not been forthcoming regarding the availability of funds for road construction, and say the Agency should acknowledge that it has turned down money offered by Congress for road construction. Other suggestions include revising the way the accounting department handles road construction by calculating depreciation over the life of the road; shifting funding priority to trail construction and maintenance; and dividing Green Sticker and gasoline tax funds equally between management costs and new trail costs.

**Road Construction** – General comments regarding road construction include the suggestion that needed road construction should be determined at the local level based on situation and need; or that it be determined on a case-by-case basis by ecologists unassociated with the Forest Service or extractive interests. One respondent remarks that the Forest Service should complete a management plan for existing roads before banning new road construction. Another suggests the Agency revise its discussion of roads in the Roadless Area Conservation Rule Draft EIS to reflect current improvements in road construction and maintenance. According to this respondent its not a matter of building roads or not building roads, but simply a matter of doing it right.

A number of respondents assert that the Forest Service should allow road construction in roadless areas—to provide access to users; to disperse recreation users; under specific exceptions; or when needed for public safety. Respondents say that the Forest Service should not use the maintenance backlog as an excuse to forego road construction. One organization points out that given the size of land mass managed by the Forest Service, that some maintenance backlog should be expected and considers the existing backlog relatively minor, so consequently should not prevent moving forward with an active roads management plan.

Others assert that the Forest Service should prohibit road construction in roadless areas—because roads lead to increased active management; increased natural resource removal; increased motorized use; increased illegal activity and abusive human behavior; and increased need for rescue operations. Some individuals state that roads contribute to trail destruction and to landslide danger. Others say that the difficult terrain in most roadless areas makes road construction difficult anyway. According to one elected official, “if there had been any real significant timber value or mineral value on those lands, the roads would have been built long ago.” One common assertion, however, is that the Forest Service should prohibit more road construction because it lacks the funding to maintain existing roads; thus some say new construction should not proceed until the backlog has been taken care of.

**Trail Construction** – Some respondents say trail construction should be allowed to continue. According to individuals and organizations, the Forest Service should construct more recreational trails, turn unneeded roads into less damaging trails, reroute “problem” trails rather than close them, establish connector trails, and construct hiking paths and trail shelters. A few respondents say the Forest Service should engage other groups in trail construction. According to one individual, the Agency should allow trail users to construct trails because it is unable to construct them efficiently itself. According to another, the Agency should work with off-road vehicle users in constructing trails to ensure environmentally responsible usage and rider safety and satisfaction.

## Road/Trail Construction General

### 947. Public Concern: The Forest Service should construct and maintain an adequate system of roads and trails.

#### AS REQUIRED BY THE MULTIPLE USE AND SUSTAINED YIELD ACT.

. . . the congressional findings and declarations section of MUSYA states:

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 and other lands administered by the Forest Service is essential if increasing demands for timber, recreation and other uses of such lands are to be met; that the existence of such a system would have the effect, among other things, of increasing the value of timber and other resources tributary to such roads; and that such a system is essential to enable the Secretary of Agriculture (hereinafter called the Secretary) to provide for intensive use, protection, development, and management of the lands under principles of multiple use and sustained yield of products and services. 16 U.S.C. [section] 532. (Business or Association, Washington, DC - #A29622.20202)

## Funding

### 948. Public Concern: The Forest Service should tell the truth regarding the availability of funds for road construction.

I've been told over and over that there isn't the money to do this or that or build trails and roads, and guess what? The USFS has been turning down money for roadbuilding for years. I'm told Congress won't give you money, but the fact is that Congress has been offering money and Dombeck has been turning it down! I was told this by a staff member on the committee for forests and forest health. So, the lie is told to the field people, and now the agency looks like a bunch of liars with an agenda. Can you dispute this? Can you prove me wrong? So go ahead and side with those so-called green groups and in a few years if you feel at a distance with the public, you will know why; the public will come to resent you all for keeping us off our public land. And don't be surprised if the public cares not a whit about stewardship because making a mess for a bunch of tyrants is a lot of fun. (Individual, Burbank, CA - #A18027.15121)

### 949. Public Concern: The Forest Service should revise the way the accounting department handles road construction.

#### BY CALCULATING DEPRECIATION OVER THE LIFE OF THE ROAD

Change the way the accounting department handles road construction. Depreciation should be over the life of the road, which, if maintained correctly, should last a very long time. (Individual, Princeton, WV - #A18086.90120)

### 950. Public Concern: The Forest Service should shift funding priority to trail construction and maintenance.

Because of the obvious desire and need for more hiking opportunities on National Forest land, funding priority should shift to trail construction and maintenance, not taxpayer funded road building that loses millions of dollars and leaves public lands denuded and useless to all.

My family and I visit roadless areas regularly. Having hiked the Boulder Ridge trail in the Mt. Baker National Forest (and then in the Sliver that's Mt. Baker Wilderness Area) just yesterday, I found it disturbing that the trail was posted as unmaintained this year due to budget and staffing concerns. Note I had a \$30 trail-park pass on my windshield as I clambored over blow-down and bushwhacked through partially bushed trail. At the top of the ridge, the view of roads and clear-cuts crisscrossing entire mountains from top to bottom was especially galling. (Individual, Seattle, WA - #A4885.17120)

**951. Public Concern: The Forest Service should divide Green Sticker and gasoline tax funds equally between management costs and new trail costs.**

Green Sticker \$ and gasoline tax should be divided equally between management costs and improvement/new trails costs. Do not spend most of the money on closures (i.e., management by laying new fences, road gates, signs stating trail closed)! (Individual, Thousand Oaks, CA - #A891.17130)

*Road Construction*

**952. Public Concern: The Forest Service should determine needed road construction at the local level.**

**BASED ON SITUATION AND NEED**

The roadless areas should be maintained with a status quo with the local ability to build or not to build roads based upon the situation and the need. (Individual, Maricopa, CA - #A3732.25000)

**953. Public Concern: The Forest Service should examine the need for new road construction on a case-by-case basis.**

**BY ECOLOGISTS UNASSOCIATED WITH THE AGENCY OR COMMODITY INTERESTS**

The need for new road construction to facilitate management activities for forest health reasons, and/or to bring wildlands back within their natural range of ecological variability should be examined on a case by case basis, with the burden of proof falling on ecologists that are independent of, and shielded from, extractive interests within and outside the agency. (Individual, Corvallis, OR - #A650.30200)

**954. Public Concern: The Forest Service should specify whether road construction and reconstruction in other unroaded areas is to be under the jurisdiction of local land managers.**

The original proposed rule discussed the prohibition on road construction and reconstruction in the inventoried roadless areas, but did not provide any guidance relative to the other unroaded areas. If it is the intent that road maintenance, reconstruction and construction are management decisions left to the local land managers' discretion, then to avoid confusion and more gridlock, we recommend that the rules clearly indicate this intent. (Elected Official, Roseburg, OR - #A11811.45420)

**955. Public Concern: The Forest Service should complete a management plan for existing roads before banning new road construction.**

The current situation relative to roads on USFS land is a question of management. Roads are needed to properly manage land. The issue is how they are managed once their original objective for development has been met. Roads properly designed, properly maintained and properly used are not evil, as some citizens believe. We think before any long-term decisions are made relative to road building bans a management plan for existing roads should be completed. (Organization, Flagstaff, AZ - #A6011.15100)

**956. Public Concern: The Forest Service should revise its discussion of roads in the Roadless Area Conservation Rule Draft EIS to reflect current improvements in road construction and maintenance.**

Roads in the forest are not like freeways (as the Administration has often compared them to in other documents). Considering the little use and low density of Forest roads, their contribution to "atmospheric emission" and "volatile organic compounds" (S-36), is minuscule and such claims are silly to be included in the DEIS, while other larger aspects of the issues are ignored.

The adverse environmental impacts that the DEIS [attributes] to roads is cloaked in terms like "potential" and "can." And nowhere in the DEIS are there any statements about how these impacts can be eliminated and/or are being mitigated. You don't have to stop building roads; you just have to do it

right. This is not to say that the DEIS is totally wrong in saying that roads can impact the environment, but road building by the Forest Service has changed a lot and the DEIS does not acknowledge that. Past mistakes have been corrected, roads are no longer put where they shouldn't be, roads are being removed that were incorrectly built, and forest engineers and hydrologists have been extensively trained in cutting edge, low impact road building and maintenance.

The DEIS mixes up generic philosophical opposition to all road and technology with specific, current, legitimate environmental concerns of road impacts. (Union, No Address - #A28881.90120)

### **957. Public Concern: The Forest Service should protect roadless areas.**

#### **TO REDUCE THE BACKLOG OF IMPROPERLY CONSTRUCTED ROADS**

The current local land management planning and scoping for individual NEPA actions works fine. However, a national policy to protect roadless areas and to reduce the backlog of improperly constructed roads is sorely needed. (Individual, Juneau, AK - #A23242.13100)

### *Allow Road Construction*

### **958. Public Concern: The Forest Service should allow road construction and maintenance in roadless areas.**

We believe that forest roads and trails, properly constructed and maintained, are an investment and a critical part of forest management, emergency response and recreation use. These same roads, whether classified or not under USFS rules, are an increasingly important part of the rural transportation and recreation system. Roads and recreation trails should be maintained to the appropriate standards for expected use; and, maintained in an environmentally sound manner following standards, laws and regulations. With the exception of Wilderness established under United States Law, forest roads and trails are an extremely important public asset in all forest ownerships, including the national forests, and must be treated as a significant capital investment. (Organization, Los Gatos, CA - #A1062.90120)

You might want to consider building roads into these areas so that the public can use them too. Roads are not evil. They serve many good purposes. (Individual, Portland, OR - #A1110.90120)

#### **TO PROVIDE ACCESS TO USERS**

Roads into many of the mountain areas need to be maintained and open to the public. There are ENOUGH wilderness areas that need to remain so. The public has a right into mountain/forest areas. As they have the right to see they are cared for and not abuse this right of being on forest/mountain lands. OPPOSED TO THIS ROADLESS CONSERVATION RULE!!!!!!!!!! (Individual, Florence, CO - #A985.90120)

#### **TO DISPERSE RECREATION USERS**

The forest needs to be kept open to the public. The new policy of destroying existing roads in the name of watershed protection and habitat management leaves the average public locked out of the woods. Building new roads to give new access points for public recreation is important because many areas are already over used. Dispersing usage to new areas would be wise rather than shrinking the areas available to use. (Individual, Bozeman, MT - #A59.90120)

#### **TO SPARE LOCAL GOVERNMENTS THE COST OF REPAIRS TO MAINTAIN NEEDED ACCESS TO UTILITY SITES**

By not allowing the construction of new roads or repair of damaged ones, the health of the forest would be greatly in danger as the accumulation of dead, unharvested timber would cause a severe fire hazard and the continued infestation of the bark beetle. The only way to protect against a catastrophic fire and manage the forest's health is to maintain the forest through responsible logging and the thinning of hazardous vegetation. In addition, if a road were washed out on public lands, local governments would have unnecessary costs and red tape to follow to get a road repaired to access their water system. (Individual, Mayfield, UT - #A6629.30100)

### **TO PROVIDE ACCESS FOR NON-TIMBER FOREST PRODUCT GATHERING**

My concern is that a major stakeholder is mostly left out of the road building deliberations the Forest Service is currently undertaking. The stakeholders 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, and 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 be carried out on less than 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. (Individual, Portland, OR - #A22188.65290)

### **WHEN NEEDED TO ADD TO THE TRANSPORTATION INFRASTRUCTURE THAT IS ESSENTIAL TO THE SECURITY AND ECONOMIC HEALTH OF THE NATION**

The roadless rule is an example of unnecessary government micro-management and a very extravagant use of public funds. Current roadless areas must never be considered off-limits for building new roads if they are needed to add to the transportation infrastructure that is essential to the security and economic health of the nation. Over the last few years there have been more than an adequate number of wilderness areas preserved to accommodate the environmental groups that are so vocal, and that caused this hurried and flawed approach to conservation. Long-term conservation means that we must have a policy that allows placing roads such that they reduce the miles between cities, towns, and recreational areas. As an example: For me to drive to Roosevelt Lake in Arizona, a very popular recreational spot for those in the Phoenix area, I must drive about 180 miles, round trip. It could be less than half that with a new road that was placed properly. This kind of conservation is just as important as improving vehicle fuel efficiency and emissions controls for long term environmental preservation. (Individual, Fountain Hills, AZ - #A5990.10112)

### **UNDER SPECIFIC EXCEPTIONS**

The exceptions for road construction include the following; (1) 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.

(2) A road is needed to conduct a response under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or to conduct a natural resource restoration under CERCLA, Section 311 of the Clean Water Act, or Oil Pollution Act. (3) A road is needed pursuant to reserved or outstanding rights, or as provided for by statute or treaty. (4) Road realignment is needed to prevent irreparable resource damage that arises from the design, location, use, or deterioration of a classified road and that cannot be mitigated by road maintenance. Road realignment may occur under this paragraph only if the road is deemed essential for public or private access, natural resource management, or public health and safety. (5) Road construction is needed to implement a road safety improvement project on a classified road determined to be hazardous on the basis of accident experience or accident potential on that road. (6) The Secretary of Agriculture determines that a Federal Aid Highway project, authorized pursuant to Title 23 of the United States Code, is in the public interest or is consistent with purposes for which the land was reserved or acquired and no other reasonable and

prudent alternative exists; or (7) A road is needed in conjunction with the continuation, extension, or renewal of mineral lease on lands that are under lease by the Secretary of Interior. (Individual, Asheville, NC - #A22623.90130)

#### **BOTH PERMANENT AND TEMPORARY ROADS**

Providing sustainable healthy forests should be the goal of all management. Our western forests are disturbance dependent, therefore plans for all Roadless areas must include descriptions of how such disturbance may be allowed or purposefully carried out. Such disturbances will logically favor orderly timber harvest and subsequent post-harvest measures—slash disposal, site preparation, reforestation, and stand stocking control. Road access may be provided by some permanent roads as well as temporary ‘roll-up roads’. (Individual, Evergreen, CO - #A19178.30100)

It is important to note that in many cases the removal of small-diameter trees is used as an excuse for logging groups to implement roads that are later used as justification for further logging. This should be addressed directly in a way that would allow roads to be “expired” after a short time period after their initial use has been satisfied. (Individual, Rochester, NY - #A8831.30100)

#### **TWO-TRACK ROADS**

I am totally opposed to the Clinton-Gore Roadless plan. We must have our two track roads in Nevada if we are able to use the Forest for grazing, mining, recreation and hunting. (Individual, Park Valley, UT - #A15252.10130)

#### **WHEN NEEDED FOR PUBLIC SAFETY**

I believe the entire area immediately East of Ogden, Utah has been inaccurately inventoried as Roadless. There are a number of current and future roads that are now, or soon will need to be, located in this area.

Even if boundary adjustments could be made to exclude these existing and future roads from what is being called the Burch Creek Roadless Area, I believe the resulting area, (sandwiched by private mountain land on the North, developed ski resort land on the East, Ogden City on the West, and Interstate 84 on the South,) is too small to have the characteristics that are desirable in a roadless area. With roads, mountain bike trails, ski runs, ski race buildings and mountain restaurants at the upper fringes of the Burch, Beus, Strongs, Malans and Taylor drainages and with city streets and homes less than 3 miles away on the lower fringes, a roadless designation seems to invite unnecessary conflicts with the adjoining high-density recreation and urban uses. To effectively administer this land, I believe the Ogden Ranger District should have at its disposal the full range of National Forest uses without the strictures imposed by a roadless designation.

Current roads in the inventoried Burch Creek roadless area, as mapped on the FS website:

- 1) The road to the Mt. Ogden Telecommunications site in Section 6 of Township 5 North, Range 1 East, Salt Lake Base and Meridian.
- 2) The road and ski run at the top of Burch Bowl between DeMoisy Peak and Strawberry Peak in Section 8 of Township 5 North, Range 1 East, Salt Lake Base and Meridian.

New road needed in the inventoried roadless area:

- 1) A skier trail from the top of Snowbasin Resort’s Strawberry Gondola north into Middle bowl. This skier road will improve skier egress from Strawberry Bowl at the end of the day, and when this road is built, it will allow the current, above ground high voltage electric line (from the top of the Mid Bowl Gondola to the top of the Strawberry Gondola) to be buried. This path is now used extensively by skiers taking the shortcut from Strawberry to Middle Bowl, resulting in a hazard as metal ski and snowboard edges cut through the insulation on the high-voltage line. A bigger hazard of not having this road (and accompanying underground power line) is that avalanche control charges are exploded in close proximity to the surface-power line. An unlucky avalanche charge could cut off power to the Strawberry Gondola for weeks if not months.

Given the two existing roads in this “roadless” area, and the need for a third, I respectfully request that the Burch Creek Roadless area near Ogden, Utah be deleted from the map of inventoried roadless areas. (Individual, Ogden, UT - #A30540.45510)

### IN CENTRAL UTAH

In the Central Utah area where I live, there has been considerable road development in the mountains along the Skyline Drive. Today this beautiful area is enjoyed by thousands of camper, hikers and fishermen every weekend. Deer and Elk are abundant and unharmed by the people using the resource. If the Forest Service's rule is put into place, the only way to get into many of those places will be by foot or horseback. A fact that will deny me and thousands of others access to the public lands their taxes pay for. (Individual, Mount Pleasant, UT - #A26116.90000)

#### **959. Public Concern: The Forest Service should not use the maintenance backlog as an excuse to forego road construction.**

Much has been made of there being a **\$8 billion total** maintenance backlog on forest roads, but the DEIS fails totally to explain that this is the result of three circumstances: 1) a severe underfunding and downsizing of the Agency for the last eight years; 2) a result of new, important environmental standards that the Forest Service now has for its roads; and 3) normal degradation as a result of time and use.

To put this in another perspective, the annual cost of maintaining *other* public highways is about \$150 billion *per year* plus another \$100 billion *per year* is needed for rebuilding (Civil Engineering, May 2000) plus an unknown amount for private roads. And in 1998, the American Society of Civil Engineers estimated that the repair and renewal of America's infrastructure would take **\$1.3 trillion**. The Forest Service's \$8 billion road need is a minuscule part of that total. The Forest Service also has \$5 billion maintenance backlog on Forest facilities, but no one (rightly so) is using that as a justification for advocating closing campgrounds and visitor centers.

The DEIS should point out that the Forest Service is the 2nd largest landowner in the United States (next to the BLM). So the Forest Service's facilities and road maintenance backlogs are a very small, and an expected, part of our country's normal infrastructure needs. We shouldn't stop our roads program, we should start taking proper care of our road systems. And that should mean that the Forest Service should do **appropriate** planning—as compared to no planning as in IRAs, or making blanket road closure statements. (Union, No Address - #A28881.17240)

### *Do Not Allow/Restrict Road Construction*

#### **960. Public Concern: The Forest Service should prohibit road construction in roadless areas.**

I do not wish to see any new roads established in either national or state parks. These resources are precious and should remain pristine and free from development of any kind. (Individual, Los Angeles, CA - #A42.90130)

I am in favor of keeping all currently roadless areas in their roadless condition. The majority of public land already has roads, and I, for one, would like to preserve the few roadless areas we still have for backpacking, hiking, and enjoying nature without the disturbances associated with roads. I support a ban on all further road building in roadless areas. (Individual, Reno, NV - #A149.90130)

The Best way to manage roadless areas in order to maintain forest health is to keep these areas ROADLESS and inaccessible to perturbations such as logging and non-point pollution caused by roads. Using roads to enable fire suppression only allows for buildup of forest debris that eventually results in catastrophic fires. Maintaining these areas in a roadless condition allows historic low intensity uses such as hunting. Construction of roads opens these areas up to high intensity use, which can result in stresses to the ecological system. (Individual, No Address - #A621.90130)

I am well aware of how little territory in America is actually "roadless" I put that in quotation marks because even so-called "roadless" areas are riddled with access to vehicles and other. I support any laws that prevent the building of new roads in Public lands or closes already existing roads to vehicle travel. (Individual, Sheffield, MA - #A4297.90130)

**BECAUSE ROADS LEAD TO INCREASED ACTIVE MANAGEMENT**

Roads lead to development. In a recent trip my wife and I took to the Sequoia National Park, I noted that a development company that has received a contract from the Federal Government has displaced the existing small businesses (condemned as “ecologically unsound” by the Federal EPA) and is in the process of developing a huge hotel complex with a convention center, restaurant, and gift shop. This development is apparently inevitable (and aided by the Federal Government) even in a National Park. The only defense is to not allow commercial development, and this includes roads. (Individual, Santa Barbara, CA - #A504.90220)

**BECAUSE ROADS LEAD TO INCREASED NATURAL RESOURCE USE**

The public property of the United States has been exploited enough by PRIVATE corporations. Opening the roads will only lead to increased logging and oil drilling—something that court designated president Bush would like. However, the majority of Americans surveyed support the protection of our national resources, and road building is a direct assault on the protection. (Individual, Albuquerque, NM - #A34.90130)

Unless, of course, you are talking about timber, energy and mining companies (TEM) which is a different type of situation from a private landowner. The traffic from the TEM entities would disrupt the wilderness areas and provide access to areas they do not own, but could exploit by virtue of a road being present. I say they give up the land within these areas for the common good, since they get enough tax credits from their other activities. (Individual, Ogden, UT - #A1166.90130)

**BECAUSE ROADS LEAD TO EXCESSIVE GATHERING**

It is best not to build roads in these places, to leave them remote and not easily accessed. If gathering is allowed in these places on a more primitive level, the resources will not be endangered. For example, when I hike into DNR land with permission to gather bark from Western Red Cedars that have been sold by the DNR to perhaps a shingle or fencing company, I am limited by what I myself can carry out on my own back. This limitation keeps me from gathering in an exploitative manner, selling for profit the raw resource of inner bark. Instead it encourages the value added by my practicing an ancient craft, keeping alive traditional technologies, which have historical and cultural importance. (Individual, Indianola, WA - #A25409.90130)

**BECAUSE ROADS LEAD TO INCREASED MOTORIZED USE**

Forest roads have proven to be almost worse than over cutting. The best way to ruin an area is to build a road into it. Roads only attract people with their ATVs and 4 X 4s who drive off-road, litter, start fires, spread noxious weeds, and otherwise damage the environment. Roads are also associated with landslides. (Individual, Missoula, MT - #A90.90130)

Roads in our national forests have been extremely harmful to the health of these forests. We don't need ORVs and ATVs chewing up our forests. (Individual, Anderson, CA - #A717.90130)

**BECAUSE ROADS LEAD TO INCREASED ILLEGAL ACTIVITY**

Roads cause erosion, encourage out-of-season hunting and other illegal activities (including meth labs and marijuana cultivation.) (Individual, No Address - #A470.90130)

Allowing roads to be put in National Forests would just be an invitation to poach. (Individual, Charleston, SC - #A3611.90130)

**BECAUSE ROADS PROVIDE AN AVENUE FOR ABUSIVE HUMAN BEHAVIOR**

By putting roads into roadless areas is to invite litter, toxic dumping, and trash, from uncaring and/or unthinking people. I am sure the forest rangers, park rangers etc. have seen this all too often. (Individual, Buffalo, NY - #A11029.10110)

Roadless areas make sense. Many roads are maintained at cost and little used, and hardship of access eliminates shooters, beer cans, plastic waterbottles, whatever litter, and firebugs. The ills of maintenance, cut branches, dirt, and rock shoved downhill, soiling watersheds, stop. The immediate environment gains. (Individual, No Address - #A5286.10111)

I wish to voice my support of the National Forest Roadless Area Conservation Rule. There is so precious little “backcountry” left. I live near a national forest—some years ago the Forest Service put culverts in and a primitive road into a pristine area where I used to hike. Now I have seen trash dumped here (old stoves, mattresses), garbage, evidence of a “hill climb” with automobiles, and once even a burning pallet. Keep the roads out! (Individual, Bozeman, MT - #A8188.10111)

Count me in to save the Forest system. I can’t believe the way the campers are taking over the land we use to hunt on they go in there set up their tents they leave their trash they put used tires in to the streams they leave their body waste and toilet paper laying around so people step in it and I’m sure the animals don’t like it either. (Individual, Lincolnton, NC - #A7407.10000)

I commented extensively on the Roadless Policy over the past three years and wish to see the January 5, 2001 rule implemented. Roding areas brings in invasive species, trash fire hazard (smoking, campfires etc.), and causes erosion which damages riparian areas. Roding areas fragments wildlife habitat and destroys it, and facilitates uses which are detrimental to wildlife (off-road vehicle use and illegal firearm use). Roding areas represents a loss of taxpayer dollars and impairs critical watersheds, as occurred in 1995-96 and loads in the Santain River due to roads [and] logging. In the Willamette National Forest lands closest to Salmon are roded, so I don’t go there—the trash, vandalism, noise and firearm use disgust me. I have hiked in to Mt. Jefferson Wilderness and Opal creek Wilderness and the difference in abundance of wildlife, quiet, beauty, and lack of trash is dramatic and makes the recreational experience worthwhile. Once areas are roded, the Forest Service must spend even more money maintaining them by trash removal and enforcement of safety laws. (Individual, Salem, OR - #A14529.30100)

#### **BECAUSE INCREASED ACCESS WILL LEAD TO INCREASED NEED FOR RESCUE OPERATIONS**

Some examples of problems caused by roads are:

Increased opportunities for violation of forest protective measures (e.g. poaching, illicit logging) with more human ingress into formerly inaccessible areas and increased need for air or ground human rescue operations which may negatively impact natural areas. (Organization, Pritchett, CO - #A21442.50500)

#### **BECAUSE ROADS CONTRIBUTE TO TRAIL DESTRUCTION**

Roads destroy more primitive transportation routes—our trail system. Trails are important to animals and humans in remote areas. Our trail system is part of our national heritage—in many cases these trails were developed by the C.C.C.s [Civilian Conservation Corp] and in some cases animals and prehistoric humans actually developed the trail routes. (Individual, Troy, MT - #A1180.90410)

#### **BECAUSE ROADS CONTRIBUTE TO LANDSLIDE DANGER**

Roads have also contributed significantly to landslides, endangering person and property. (Individual, Davis, CA - #A6615.90130)

I’ve seen neighbors swept to their deaths by mudslides due to clear-cuts approved by professional loggers. (Individual, Roseburg, OR - #A4788.90520)

#### **BECAUSE THE DIFFICULT TERRAIN IN MOST ROADLESS AREAS IMPEDES ROAD CONSTRUCTION**

Why are the areas that are proposed as roadless areas roadless? If there had been any real significant timber value or mineral value on those lands, the roads would have been built long ago. The simple truth is that those areas where roads have yet to be built are roadless because it was simply too costly and difficult to get roads into those areas. It makes little sense to build expensive roads into areas that are hard to reach when the Forest Service is unable to maintain or repair thousands of miles of failing roads.

I am very familiar with several of the proposed roadless areas in Washington, Idaho and Montana. I have done extensive geologic mapping in several of them as a researcher and under contract with state

governments. It would be a remarkable engineering feat to get a road into some of those areas. Certainly that is the case for the proposed roadless areas in Whatcom County. (Elected Official, Bellingham, WA - #A4955.90130)

#### **BECAUSE THE FOREST SERVICE LACKS THE FUNDING TO MAINTAIN EXISTING ROADS**

Roads have a profound effect on the natural landscape and once built interfere with the local ecology indefinitely. As the Forest Service well knows, maintenance costs are huge and the backlog of such costs on existing roads will never be met. It is unwise to build new roads on lands currently designated as roadless. (Individual, Olympia, WA - #A510.90130)

Note that roads are expensive to build and that taxpayers are rarely reimbursed for the many Forest Service roads built for the de facto exclusive purposes of private logging and mining firms. Road maintenance and erosion control measures add to the cost of these roads. Additional helicopters and hiring of pedestrian forest management personnel could be had for similar cost to road construction. (Individual, No Address - #A117.90130)

I am concerned, as a tax payer and voter, that building additional roads into these areas would be primarily at the tax payers expense for the benefit of a few special interests, such as the subsidized timber and mining interests who do not bear the appropriate share of the costs in building, maintenance, and cleanup. The forest service cannot afford to keep most existing roads properly maintained. (Individual, Gallatin Gateway, MT - #A17684.75600)

Protecting and preserving the remaining roadless areas on our public lands serves the public in many ways. The network of roads in the roaded portions of our public lands is already excessive and unmanageable. The U.S. Forest Service road maintenance program costs American taxpayers hundreds of millions of dollars per year and currently suffers a debit of hundreds of millions of dollars. U.S. Forest Service annual reports for every year since 1996 reveal further costs to the taxpayer in the form of heavily subsidized logging, mining, and grazing of our public lands all of which fail to return even the cost of administration. Yet these industries enjoy a second round of subsidies in the form of roads built across our public lands primarily to support extraction of natural resources with recreational access an afterthought often used [as] an excuse to perpetuate already heavily subsidized industrial use of our public lands. (Individual, Kennewick, WA - #A23359.75600)

There are already more roads on the national forest system than can be cared for.

The Department is concerned about building new roads in inventoried roadless areas, when there presently exists a backlog of about \$8.4 billion in deferred maintenance and reconstruction on the more than 386,000-miles of roads in the Forest Transportation System. The agency estimates that at least 60,000 miles of additional unauthorized roads exist across National Forest System lands. The agency receives less than 20% of the funds needed annually to maintain the existing road infrastructure. As funding needs remain unmet, the cost of fixing deteriorating roads increases exponentially every year. Failure to maintain existing roads can also lead to erosion and water quality degradation and other environmental problems and potential threats to human safety. It makes little fiscal or environmental sense to build additional roads in inventoried roadless areas that have irretrievable values at risk when the agency is stragglng to maintain its existing extensive road system. (Organization, Denver, CO - #A12008.17100)

National forests in Colorado have a multi-million dollar backlog in road maintenance. Where the agency cannot keep its current "assets" in good repair, it makes little sense to permit new road construction in the most remote areas, where road construction is the most expensive. (Organization, Boulder, CO - #A13463.17240)

### IN SENSITIVE AREAS

All sensitive areas must be off limits to roads. Some areas (e.g. riparian areas, unstable slopes, and sensitive and degraded watersheds) are simply unsuitable for roads. The needs of disturbance-sensitive species must inform road construction, maintenance and use. (Organization, Arcata, CA - #A1778.45100)

### NEAR WILDERNESS AREAS

Roadways near wilderness areas (BWCA) effectively reduce the size of the wilderness even if the roads don't enter the BWCA because they allow faster entry into wilderness which already suffers from heavy use. (Individual, Clear Lake, IA - #A8886.90000)

### ONCE INVENTORIED AREAS ARE MAPPED ACCURATELY

Once inventoried roadless areas are mapped accurately, with those areas with roads deleted from the inventory, permanent roads should be prohibited. (Individual, Longview, WA - #A18940.90130)

### UNTIL NEW FOREST PLANS ARE IN PLACE

There are over 60,000 of the acres in the GMNF that demand protection. There is a need to be a moratorium on any road building or resource extraction in these areas until the new forest plan is re-written. (Business, Bristol, VT - #A8734.12440)

### UNTIL THE AGENCY IS ABLE TO BETTER MANAGE THE EXISTING ROAD NETWORK

At the very least, we should continue a moratorium on all new roads until we do a better job of managing the Forest Service's existing road network. (Individual, Arlington, MA - #A7703.12440)

## *Allow Trail Construction*

### **961. Public Concern: The Forest Service should construct more recreational trails.**

Encourage and build more recreational trails. Trails provide natural barriers and they provide a mechanism to get at a problem area quickly. (Individual, Fraser, CO - #A30203.30000)

### **962. Public Concern: The Forest Service should allow trail construction.**

#### RATHER THAN ROAD CONSTRUCTION

The best and only acceptable compromise are trails—NOT ROADS! Perhaps, provisions can be allowed for ATVs and horse trails; but nothing more; and, the law does not need to be interpreted for more. (Individual, Geneva, NE - #A15512.90410)

#### LESS THAN SIX FEET WIDE

Access can be attained with trails less than six feet wide. (Individual, Ketchikan, AK - #A13522.90510)

### **963. Public Concern: The Forest Service should turn unneeded roads into less damaging trails.**

I am writing to urge your support of the protection of roadless areas in our National Forests. From personal experience, there are very few areas in Virginia's National Forests that are not crisscrossed by dirt roads, which specifically erode sediment into streams, badly damaging them as native brook trout habitat. It is a rare mountain hollow in Virginia's National Forests that does not have a dirt road running along next to the stream. Please help protect the remaining roadless areas in my state and turn the unneeded roads into less damaging trails. (Individual, Richmond, VA - #A888.10111)

**964. Public Concern: The Forest Service should reroute “problem” trails rather than close them.**

With education, local OHV enthusiast partners can identify and help correct problematic routes. To encourage users to be “part of the solution” the Forest Service should be creative in its remedy for troubled areas or trails in roadless and unroaded areas. If it is not possible to “fix” a trail/area problem, then rerouting should be considered a preferred alternative to simply closing the route or area. (Individual, Victoria, KS - #A2874.90000)

**965. Public Concern: The Forest Service should establish connector trails.****TO AVOID DEAD-END TRAILS**

Connector trails should be constructed to avoid dead-end trails. These systems could provide recreation opportunities for a variety of skill levels. The document and alternative formulation should evaluate all of these sorts of opportunities. (Organization, Helena, MT - #A13226.91211)

**966. Public Concern: The Forest Service should construct hiking paths and trail shelters.****RATHER THAN ROADS**

It is critical that we prevent more logging roads into our national and state forests and wilderness areas. Our populace is already jammed into overdeveloped urban infrastructures that have decimated local wildlife and fauna. Our national forests need to be preserved for future generations and the existing ecological balances left alone. Road building will lead inexorably to logging and mining these areas. Instead work on developing hiking paths and trail shelters for easier exploration of these wild areas. (Individual, Fort Wayne, IN - #A479.10111)

**967. Public Concern: The Forest Service should allow trail users to construct trails.****BECAUSE THE FOREST SERVICE IS UNABLE TO CONSTRUCT THEM EFFICIENTLY**

The USFS should stay away from the trail making business. They don’t make good trails and their cost is prohibitive. There is no reason trails should be expensive to make—it’s the process that’s the problem. Let the people that use them make them—they know what they want and they’ll do it for 1/10th the price. (Individual, Palmer Lake, CO - #A23361.90420)

**968. Public Concern: The Forest Service should work with off-road vehicle users in developing and maintaining trails.****TO ENSURE ENVIRONMENTALLY RESPONSIBLE USAGE AND RIDER SAFETY AND SATISFACTION**

Working with OHV enthusiasts the Forest Service can develop long, well-marked, challenging, and aesthetically rewarding trail systems that will hedge route proliferation and trespassing. These trails can be managed and maintained to ensure environmental responsibility as well as rider safety and satisfaction. (Individual, Lawrenceville, GA - #A6172.30200)

## Road/Trail Maintenance/Reconstruction

### Summary

**General Comments** – One general comment regarding road/trail maintenance/reconstruction is that the Forest Service should establish a uniform checklist and a clearly defined process to govern road and trail maintenance. According to one Organization, this would allow consistent, scientific direction that could be followed by all partners such as local governments, tribes, communities and forest planning officials.

**Funding** – A number of respondents say the Forest Service should provide adequate funding for road maintenance; some suggest this could be accomplished by using national highway gas tax funds. Others assert that the Forest Service should eliminate all road maintenance backlogs—by reprioritizing funding or by considering cost-saving measures for maintenance. Some respondents ask the Forest Service to justify its claim that there is an \$8.6 billion road maintenance backlog, while others suggest that the Agency tie adequate road maintenance funding to best management practices for timber removal, and that it seek funding for trail maintenance from states.

**Road Maintenance/Reconstruction** – General comments regarding road maintenance/reconstruction include the request that the Forest Service provide new direction for road maintenance in the Forest Service Manual; that it clarify what road restoration activities will be allowed under the Roadless Area Conservation Rule for roads significantly damaged by natural hazards; that it address road maintenance needs in the Tongass National Forest; and that it sign unmaintained roads indicating user liability. Beyond these more general comments, a number of respondents urge the Forest Service to maintain existing roads—by rerouting roads that are causing damage, by waterproofing needed roads, or by bringing roads up to standard. Some suggest that the Forest Service allow off-highway clubs to maintain roads that counties and states cannot, and that it assist Permit Holders in road maintenance.

**Trail Maintenance/Reconstruction** – A few respondents offer comment specifically on trail maintenance/reconstruction. Some suggest that the Forest Service should maintain all existing trails in the trail inventory. According to one individual, there should be an on-going trail maintenance program rather than the hit-and-miss funding that seems to have occurred in the past. An Organization suggests that the Agency clear trails early in the year “to ensure maximum availability and reduction of diversion damage caused by routing around obstacles.”

### *Road/Trail Maintenance/Reconstruction General*

#### **969. Public Concern: The Forest Service should establish a uniform checklist and a clearly defined process to govern road and trail maintenance.**

ABATE of Illinois believes that trail, road, and cross-country health of the forest should be based on standard criteria using a uniform checklist and a clearly defined process that would minimize personal interpretation.

This, along with directives to provide for all types of recreation, would allow strong leadership from local forest planning officials, local governments, communities, tribes and organizations in the design of the forest as well as the application of scientific criteria. (Organization, Naperville, IL - #A20342.13110)

### *Funding*

#### **970. Public Concern: The Forest Service should provide adequate funding for road maintenance.**

We strongly feel that the first priority should be given to maintaining existing roads, together with adequate funding for all associated costs connected with allowing access to these roads, such as clean up of illegal dumping and adjacent off road vehicle damage, as well as actual road maintenance and repair.

We are strongly opposed to the building of any new roads in currently roadless areas. Any new road building should be focused in areas previously accessed for logging, etc. As you know, the existing undisturbed forested land that is still available represents only a fragment of what once was. (Individual, Selma, OR - #A1594.45500)

**BY USING NATIONAL HIGHWAY GAS TAX FUNDS**

I support the proposed use of some National Highway gas tax funds to maintain and upgrade the forest roads. Primary paved existing roads should be brought up to minimum safety standards based upon the road, number of vehicles, terrain, etc. If a condition of receiving the funds is that they can only be used to bring all forest roads up to “common public highway standards”, then I oppose the receipt of the funds. I believe this requirement could be used as a way to remove significant roads from the overall system as many of them can’t meet the national standards due to narrow width, etc. (Individual, North Bend, WA - #A27321.17110)

**971. Public Concern: The Forest Service should eliminate all road maintenance backlogs.****BY REPRIORITIZING FUNDING**

The Forest Service should require sufficient maintenance of existing roads and reprioritize funding until all maintenance backlogs are eliminated. New direction for proper maintenance of roads should be detailed in the Forest Service Manual. New roads, both within inventoried roadless areas and in other portions of the national forests, will be needed in the future to accommodate management activities and the needs of society. When carefully designed and maintained on a forest-by-forest level, the benefits of roads will far exceed costs to both the natural resources and the public. (Professional Society, Anchorage, AK - #A21707.17240)

**BY CONSIDERING COST-SAVING MEASURES FOR MAINTENANCE**

Reducing and eventually eliminating the \$8.4 billion debt accrued for national forest road repair should be a major consideration. If the Roadless Rule is amended, the Forest Service might consider cost-saving measures for maintenance such as closing unneeded non-system roads that may exist in the Roadless area in favor of constructing new roads deemed necessary and approved, e.g., for firefighting especially near home sites, fuel removal, and insect control. Also, the Forest Service might consider an exemption for realigning or reconstructing necessary roads in roadless areas if the outcome is less damaging to the environment in the long run. (Federal Agency, Washington, DC - #A28843.17240)

**972. Public Concern: The Forest Service should tie adequate road maintenance funding to best management practices for timber removal.**

Continue to practice stringent road building standards to maintain wildlife corridors, high quality fish and wildlife habitat and the biodiversity of the forests. The current funding of immediate road maintenance needs identified for repairs is a step in good faith, but annual funding earmarked to road maintenance is an essential component for best management practices. Provide funding that is linked to any timber sale plan to safeguard stricter logging standards set for road building. (Individual, Pelican, AK - #A26552.75600)

**973. Public Concern: The Forest Service should justify its claim that there is an \$8.6 billion road maintenance backlog.**

I find the claim of an \$8.6 billion road maintenance backlog to be beyond belief. (Individual, Fruitdale, SD - #A7638.12200)

The analysis needs to rationally explain, inventory, verify and document the so-called “eight billion dollar” road maintenance backlog and the so-called network of “ghost roads.” (Association, Salem, OR - #A21754.17240)

**974. Public Concern: The Forest Service should seek funding for trail maintenance from states.**

If more money is needed to maintain the existing trail system we suggest that you check with the various states affected by your proposal to see if trail maintenance funds are available. The off-road trail fund in Wisconsin has a very good level of funding for such purposes. Closing OHV and ATV trails because of

lack of funding for roads in an inappropriate response to a different problem. (Organization, Portage, WI - #A27773.17100)

## *Road Maintenance/Reconstruction*

### **975. Public Concern: The Forest Service should provide new direction for road maintenance.**

#### **IN THE FOREST SERVICE MANUAL**

The Forest Service should require sufficient maintenance of existing roads and reprioritize funding until all maintenance backlogs are eliminated. New direction for proper maintenance of roads should be detailed in the Forest Service Manual. New roads, both within inventoried roadless areas and in other portions of the national forests, will be needed in the future to accommodate management activities and the needs of society. When carefully designed and maintained on a forest-by-forest level, the benefits of roads will far exceed costs to both the natural resources and the public. (Professional Society, Anchorage, AK - #A21707.17240)

### **976. Public Concern: The Forest Service should clarify what road restoration activities will be allowed under the Roadless Area Conservation Rule.**

#### **FOR ROADS SIGNIFICANTLY DAMAGED BY NATURAL HAZARDS**

We noted that certain provisions and maps of the proposed rule were vague and required clarification. As an example, it was unclear in the definitions of **road maintenance** and **road reconstruction** if a road significantly damaged by a natural hazard such as an avalanche may be fully restored. Based upon the proposed rule's definitions, it appeared that only minor restoration might be permitted. The permissible activities allowed that are greater than "minor restoration" yet less than "reconstruction" were not clear. (Elected Official, Bridgeport, CA - #A18107.90210)

### **977. Public Concern: The Forest Service should address road maintenance needs in the Tongass National Forest.**

Maintain or eliminate and rehabilitate existing roads: The Forest Service should be focusing future management activities on maintaining the existing road system on the Tongass. Many of these road systems are in desperate need of attention. The countless miles of eroding roadbeds and hundreds of washed out culverts and bridges are causing lasting damaging impacts to our anadromous fish streams. As commercial fishing is the number 1 private employer in the region, I believe Forest Service efforts should focus on undoing the harm done to the resource on which this important industry depends. I don't believe the Forest Service should proceed with any road building at all. Instead roads that are unused or beyond hope of repair should be eliminated and rehabilitated. There is a sufficient backlog of road maintenance and rehab needs on the Forest to keep Forest Engineers busy into the foreseeable future. (Individual, Tenakee Springs, AK - #A1758.90210)

According to a Forest Service report, a serious problem exists with roaded crossing over Tongass fish streams. It revealed the failure of road culverts to allow the passage of juvenile fish (nearly 80% on the trout streams surveyed). The Forest Service is unable to maintain the thousands of miles of roads it has already allowed to be cut through the Tongass. It would make no sense to build more roads until the existing ones can be maintained or removed.

We request that St. James Bay and Pt. Couverden near Juneau receive protection if the Tongass is considered in the roadless policy. (Business, Juneau, AK - #A28683.45621)

**978. Public Concern: The Forest Service should sign unmaintained roads indicating user liability.**

I suggest as a compromise that road closures be prohibited but stop road maintenance. The roads will soon become impassable anyway, even if their users are allowed to roll off rocks etc. The "Road Closed" sign, which is really a bow to some insurance, a matter of liability, should be replaced by a sign laying liability squarely on the shoulders of the user. We are not children that have to be protected from their own actions. WE will find a way to get unstuck. (An afterthought: if driving over a middle strip of high dry grass represents a real fire danger, some roads may have to be closed after all. In that case it should be seasonal.) (Individual, No Address - #A5286.90000)

*Allow Road Maintenance/Reconstruction*

**979. Public Concern: The Forest Service should maintain existing roads.**

**BY REROUTING ROADS THAT ARE CAUSING DAMAGE**

Existing roads should be maintained to minimize impacts to watersheds. I would suggest that existing roads, where problems exist, that the first option is to reroute, repair, and or resolve the problems as the first priority. I would suggest that these roads be closed only AFTER all other means have been tried to resolve the problems. The roads should be reviewed on an individual basis by the local people. (Individual, Boise, ID - #A5362.90120)

**BY WATERPROOFING NEEDED ROADS**

Set a schedule to "waterproof" existing needed roads. (Professional Society, Saint Leonard, MD - #A9040.90120)

**BY BRINGING ROADS UP TO STANDARD**

When reconstructing roads as part of new timber sales make sure they are brought up to standard. (Professional Society, Saint Leonard, MD - #A9040.90120)

You have invited public comment on the proposal to maintain and upgrade current Forest Service roads. As you pointed out in your May 16, 2000, statement to the Senate Subcommittee on Energy and Natural Resources, forest roads, especially when poorly maintained, can have adverse impacts on watersheds. Few marks on the land are more lasting than roads, and many roads in the national forests do not meet current standards for safety and environmental protection. Many of the classified roads have not been properly maintained, and other roads are neither classified nor maintained. Some of them are simply cleared caterpillar tracks into logging areas. (Organization, Deerfield, IL - #A19049.50000)

**980. Public Concern: The Forest Service should maintain roads that charge special use fees.**

Where residents pay special uses fees for roads, the maintenance should be the responsibility of the Forest Service. (Individual, Marion, NC - #A4691.17120)

**981. Public Concern: The Forest Service should allow off-highway clubs to maintain roads that counties and states cannot.**

**BECAUSE TOO MUCH LAND AND ROADS HAVE BEEN TAKEN FROM THE PEOPLE**

There are many off highway clubs that would maintain roads that county and states can't, just for the fun of using. There's just been too much land and roads taken from the people. (Individual, No Address - #A742.45524)

**982. Public Concern: The Forest Service should assist Permit Holders in road maintenance.**

I think Permit Holders should have FS assistance, in maintaining roads and bridges where the Forest Service dictates the road and bridge design and requires upkeep for FS fire fighting equipment. (Individual, Marion, NC - #A4691.30200)

*Allow Trail Maintenance/Reconstruction*

**983. Public Concern: The Forest Service should maintain all existing trails in the Forest Service trail inventory.**

Maintain all existing trails on the forest service trail inventory. (Organization, Helena, MT - #A13226.45400)

**AS PART OF A CONSERVATION PROCESS**

Part of the “conservation” process can and should be an intensive, on-going trail maintenance program rather than the hit-and-miss funding that line item has received in the past. Statewide OHV programs have certainly proved they can provide a large measure of that stewardship. These programs are currently under-utilized due to political grandstanding and obstructionism by supporters of the Clinton land grabbers. The rule must be significantly revised to address recreation access and recognize all of the potential contributors to partnerships for forest health maintenance. (Individual, Bozeman, MT - #A19102.90410)

**984. Public Concern: The Forest Service should clear trails early in the year.**

**TO ENSURE MAXIMUM ACCESS AND REDUCTION OF DAMAGE**

Trails should be cleared early in the year to ensure maximum availability and reduction of diversion damage caused by routing around obstacles. (Organization, Helena, MT - #A13226.90411)

## Road/Trail Closure/Obliteration/Restoration

### Summary

**General Comments** – Comments regarding road/trail closure/obliteration/restoration include the suggestion that the Forest Service close all user-created routes until site-specific analysis can be completed to determine what status they should have; that it obliterate non-system roads and trails after they are adequately mapped and to avoid unintentional trespassing; that it work with off-road vehicle groups to avoid unnecessary road or trail closures; and that it provide adequate signs to indicate that a road or trail has been closed.

**Funding** – According to one individual, the Forest Service should not close roads that it does not have the funding to maintain. This person remarks, “Closures simply shouldn’t be an option for a lack of financial resources necessary to regulate proper use of the roads.”

**Road Closure/Obliteration/Restoration** – Respondents offer several different remarks regarding road closure/obliteration/restoration. One business asks the Forest Service to clarify the evaluation process for closing unclassified roads. Others say there should be public participation for the local communities to provide input before choosing which roads to close or obliterate. One association asserts that the Forest Service should not include roads associated with mining activities in the backlog of roads needing to be reclaimed as those are already mandated by other laws that the permittee is accountable for. Additionally, one elected official questions the adequacy of the statement made in the Advance Notice of Proposed Rulemaking

that the existing road system “was largely funded and constructed to develop areas for timber harvesting and the development of other resources.” According to this respondent, the Forest Service should recognize that, absent recreational needs, roads built for timber removal could be closed after logging, inasmuch as roads built solely for timber removal do not require the high construction standards necessary for roads which serve recreational purposes.

Beyond these general remarks, some respondents assert that the Forest Service should decommission existing roads. One individual believe that the goal should be to remove as many roads as possible. Another suggests eliminating from the travel plan all roads that are not currently shown on maps. An Organization suggests that the Forest Service clearly state in the Roadless Area Conservation Rule that any road constructed in compliance with the exceptions must be closed and rehabilitated as soon as possible.

Some respondents assert that the Forest Service should not decommission existing roads because access to large areas disperses impact. In particular, states one individual, roads which are main arteries to other areas should not be decommissioned. Moreover, say others, the Forest Service should not use the fact that roads are not maintained properly as an excuse to decommission them because “primitive tracks are more fun to drive than the high-speed routes.”

### *Road/Trail Closure/Obliteration/Restoration General*

#### **985. Public Concern: The Forest Service should close all user-created routes.**

##### **UNTIL SITE-SPECIFIC ANALYSIS CAN BE COMPLETED TO DETERMINE WHAT STATUS THEY SHOULD HAVE**

Further, all illegally-created unclassified routes in roadless areas must be closed until site-specific analysis can be completed to determine whether to remove or decommission the travelway, or to open and classify the travelway as a motorized route or non-motorized trail. 36 CFR 261.10(a) states that “constructing, placing, or maintaining any kind of road, trail . . . on National Forest System land or facilities without a special-use authorization, contract, or approved operating plan” is prohibited. In addition, illegally-created unclassified routes should not be allowed to remain open while that site specific analysis takes place since they were created illegally and are likely to be causing “adverse environmental impact” (NEPA 40 CFR 1506.1 (a)(1)). (Organization, Missoula, MT - #A21359.90420)

#### **986. Public Concern: The Forest Service should obliterate non-system roads and trails.**

##### **AFTER THEY ARE ADEQUATELY MAPPED**

Forest plans should address those activities not already regulated by the existing roadless rule, especially off-road vehicles. These should not be allowed cross-country access in roadless areas. In many cases, trails should also be closed to motorized vehicle use. Non-system roads should be mapped and obliterated. (Individual, Victor, ID - #A20625.90110)

##### **TO AVOID UNINTENTIONAL TRESPASSING**

To avoid unintentional trespass in the long run, it is necessary to obliterate all evidence of routes no longer open to OHV recreation. Additionally, it may be helpful to reroute those trails remaining open, to avoid intersections with the closed routes. (Individual, Arroyo Grande, CA - #A19060.90410)

**987. Public Concern: The Forest Service should work with off-road vehicle groups.**

**TO AVOID UNNECESSARY ROAD OR TRAIL CLOSURES**

Solutions to problems must be worked out jointly enabling land managers and all interested parties to understand each other's concerns and needs. Joint, multiple meetings would be most advantageous to all concerned. We do not want to see any loss of roads or trails. Land managers have a viable and willing volunteer working force at their disposal—Off-highway Vehicle Users! With Adopt-a-Road programs, Cooperative Management Agreements and Memorandums of Understanding we can, and have accomplished a great deal. As an example: GPSing, rebuilding trails, erecting fences, putting up signs, constructing water bars, water crossings and maintaining roads and trails. (Organization, Bullhead City, AZ - #A12066.15123)

**988. Public Concern: The Forest Service should provide adequate signs to indicate that a road or trail has been closed.**

If it is necessary to close a route, managers must help motorized recreationists avoid the prohibited trail. In the short-run, signs and notes maps can help users avoid areas newly closed to them. To avoid unintentional trespass in the long-run, it is necessary to obliterate all evidence of routes no longer open to OHV recreation. Additionally, it may be helpful to reroute those trails remaining open, to avoid intersections with the closed routes. (Individual, Victoria, KS - #A2874.90000)

**SIGNS SHOULD STATE A LEGITIMATE REASON FOR THE CLOSURE**

Utilize consistent trail signing and marking so that the public is not confused. Trails closed unless otherwise marked open are not reasonable. Trails, when closed, should be signed with an official, legitimate reason. (Organization, Helena, MT - #A13226.91110)

*Funding*

**989. Public Concern: The Forest Service should not close roads that it does not have the funding to maintain.**

Closures simply shouldn't be an option for a lack of financial resources necessary to regulate proper use of the roads. (Individual, Lake Havasu City, AZ - #A735.17100)

*Road Closure/Obliteration/Restoration*

**990. Public Concern: The Forest Service should clarify the evaluation process for closing unclassified roads.**

There is a confusing and at times conflicting issue that the FEIS identifies: Forest Service "classified", system roads vs. "unclassified", non-system roads. Classified, system roads may consist of 385,000 miles, but there are at least 2 to 3 times that many unclassified roads. On the INF there may be one classified road that has been constructed within the IRAs, but there are hundreds of miles of unclassified roads in IRAs. As best as the reader of the FEIS can tell from the maps provided, some of these roads are in areas identified as unroaded portions of IRAs. While the document boasts that "no roads or trails are going to be closed because of these prohibitions" for system, classified roads, that is not the case for non-system, unclassified roads. The document neglects to disclose that since there are many more miles of unclassified roads than classified, that while no roads or trails shall be closed immediately upon signing of this proposed rule, anytime a cause arises (washout, something as simple as a fallen tree, etc.), an unclassified road in an IRA will be evaluated using the criteria set forth in the rule. The criteria prohibit, but are not limited to, reconstruction that increases a road's capacity, service level, or original design function. There is no information provided as to how the baseline data are going to be obtained, how evaluations will occur, and how decisions will be implemented. (Business, Mammoth Lakes, CA - #A30296.45200)

**991. Public Concern: The Forest Service should consider public comment before closing roads.**

I feel that before any roads either classified or unclassified are closed there should be a period of comment for the local people to air their views and then the decision should be made based on the facts that are presented at these hearings. There have been too many roads closed that would better serve the sportsman if they were left open, and there would be very little adverse impact on the ecosystem if they were left open. Lets get the people who actually use the land involved instead of just the politicians. (Individual, Riverton, WY - #A4722.90120)

The obliteration of roads during “rehabilitation” must be based on local needs and input. (Individual, Oroville, CA - #A17888.15111)

**992. Public Concern: The Forest Service should not include roads associated with mining activities in the backlog of roads needing to be reclaimed.****DUE TO THE REQUIREMENTS FOR RECLAMATION UNDER FEDERAL AND STATE REGULATION**

Principle nine, “Competing Values and Limited Resources,” is very important in our view. Because (as we discuss in more detail in Attachments 4 and 5) mining activities on National Forest lands are required to be reclaimed pursuant to federal and state regulation, the burden of constructing, monitoring, and reclaiming roads on such mining operations is carried by the mine operator. The backlog of roads needing to be reclaimed in the nation’s forests, which was cited in the original proposal to justify the Roadless Rule, see, e.g., 66 Fed. Reg. at 3245-46, should not have included roads associated with coal or hard rock mining activities in light of the requirements for reclamation under applicable federal and state requirements as well as the need for the mine operator to post a financial warranty to guarantee reclamation in the event the operator is unable to complete the necessary reclamation task. As such, Forest Service funds need not be used for such roaded activities. Any new Roadless Rule should clearly and distinctly recognize this fact. Any new Rule should also recognize that, to the extent authorized by statute, the Forest Service can (and does) broker consensual agreements among diverse groups regarding mining on National Forest lands. (Association, Washington, DC - #A19636.65320)

Mining on National Forest lands requires compliance with all federal environmental protection statutes such as the Clean Air Act, the Clean Water Act, and the National Environmental Policy Act. In addition, however, coal-mining operations on National Forests lands must also meet the specific mining and reclamation requirements set forth in the Surface Mining Control and Reclamation Act of 1977 (“SMCRA”) and its implementing regulations.

SMCRA, itself, contains specific mining and reclamation performance requirements for roads, and SMCRA’s implementing regulations include extraordinarily detailed environmental protection performance and design standards for roads. Also, unless the Forest Service requests otherwise, coalmine roads on National Forest lands are not open to the public. Furthermore, costs of construction, reconstruction, maintenance, and reclamation of these roads are borne by the mine operator. Thus, from a Forest Service budget perspective, these roads do not add to the backlog of maintenance costs currently faced by the Agency. (Association, Washington, DC - #A19636.65370)

**993. Public Concern: The Forest Service should recognize that, absent recreational needs, roads built for timber removal could be closed after logging.****BECAUSE ROADS BUILT SOLELY FOR LOGGING DO NOT REQUIRE THE HIGH CONSTRUCTION STANDARDS NECESSARY FOR ROADS WHICH SERVE RECREATIONAL PURPOSES**

We note that in the Advance Notice of Proposed Rulemaking the statement that the existing road system on National Forest System lands “was largely funded and constructed to develop areas for timber harvesting and the development of other resources” (63 F.R. 4350-01, p.1). However, it is worth noting that these roads were most often built to a higher standard than necessary solely for timber harvesting.

As a result, the local counties' timber receipts were reduced while the Forest Service used these timber receipts to subsidize the other forest uses. To a large extent these forest roads were built to higher standards solely to accommodate recreational uses. Absent these recreational needs the roads would have or could have been closed after logging. (Elected Official, Roseburg, OR - #A11811.90000)

**994. Public Concern: The Forest Service should clarify whether certain roads will be closed due to their roadless designation.**

**THE ROAD NEAR SOUTHERN ARIZONA'S PENA BLANCA LAKE**

A small "roadless" dot near Southern Arizona's Pena Blanca Lake looked as though it covered a road below the dam that's popular with birders. When I asked the main Coronado National Forest office, they didn't even know there was a road there. Then I was told it did not impact the road. The Nogales office of the same forest said it thought that road would be closed because it was in a "designated roadless" area. Which is it? I would think Southern Arizona's birders need an answer before they can even submit a comment. (Individual, Tucson, AZ - #A5278.45100)

**995. Public Concern: The Forest Service should reconsider decisions that turned specific existing roads into trails.**

**TRAIL 67**

The nameless road to Walker has recently been designated a trail (Trail 67) by the Forest Service. Motorized travel is now prohibited. Hikers, mountain bikers and horses are allowed. This surely must be some kind of joke. First, that road (Trail 67) crosses my property and other private property, just a few hundred feet south of the northern end of the road. The Forest Service has never discussed this with me or any other property owners that I know of. What is even worse is the trail is blocked by a sturdy Forest Service barbed wire fence and locked gate. One certainly wonders how the hikers, mountain bikers and horses are to get to the trail. The Forest Service has indicated that the road may be used for emergencies, but any other motorized travel will result in a citation. I wonder how the Forest Service thinks someone in an emergency is going to get through the fence and locked gate. (Individual, Phoenix, AZ - #A29149.15111)

*Allow Road Closure/Obliteration/Restoration*

**996. Public Concern: The Forest Service should decommission existing roads.**

This is a precious resource that we should take extraordinary precautions to preserve, and unless absolutely compelling need arises, we must maintain the status quo. The goal should be to remove roads whenever possible, in an attempt to reclaim some of this precious heritage. (Individual, Santa Barbara, CA - #A504.90310)

Roadless Areas should be kept as is. Many spurs of logging roads ought to be decommissioned to increase wildlife corridors. This decommissioning process would employ locals, and would reduce the ecosystem [damage] done by constructing the roads in the first place. (Individual, Olympia, WA - #A614.90310)

The forest service has more roads that it can possibly maintain. If anything they should be spending their time closing roads not building them. Roads are a proven detriment to fish and wildlife; erosion from poorly maintained roads is one of the worst legacies the forest service has left us with. Will that situation be improved if we build more roads? (Individual, Amasa, MI - #A793.90310)

Gate and close more of the existing roads. (Individual, Corbett, OR - #A11196.90310)

**997. Public Concern: The Forest Service should eliminate from the travel plan roads that are not currently shown on maps.**

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 - #A5394.10155)

**998. Public Concern: The Forest Service should clearly state in the Roadless Area Conservation Rule that any road constructed in compliance with the exceptions must be closed and rehabilitated as soon as possible.**

As the rule currently stands, we request that clarifying language be added to the rule that states that any road constructed in compliance with the exceptions must be, as soon as practicable, closed, ripped, recontoured and rehabilitated. In addition, roads built in compliance with the exceptions shall not be used to preclude a roadless area from consideration for Wilderness designation or other protective management prescription. (Organization, Missoula, MT - #A21359.90130)

***Do Not Allow/Restrict Road Closure/Obliteration/Restoration*****999. Public Concern: The Forest Service should not decommission existing roads.**

This is our land so leave the roads in for us to enjoy it. Closing roads off because of the man-hating Green movement is equal to socialism. This is America our tax dollars pay to maintain the forest and to use it. Leave all the roads open. (Individual, Houghton, MI - #A70.90320)

While I'm not in favor of building new roads without a complete and thorough review, existing roads should be kept open and monitored. DO NOT CLOSE ROADS. (Individual, Lake Havasu City, AZ - #A735.90320)

**ROADS THAT ARE MAIN ARTERIES TO OTHER AREAS**

While it is important to allow equal access to our national heritage of the land, I feel it is equally important to consider the whole value of our lands. I have hunted, fished and camped on many tracks of national lands and can say without any reservation that I will return. The best example is the track of national forest in the Little Belt Mountains of Montana. There were many acres that were accessible only by primitive methods of beast and or human power. But to get to these were well maintained gravel roads that were used as jump-off points into those roadless areas. I would support a policy similar to this. One that has a main artery that allows access to those jump-off points to our national heritage—the land. (Individual, Santa Maria, CA - #A3981.91110)

**BECAUSE ACCESS TO LARGE AREAS DISPERSES IMPACT**

Not all roads need to be maintained, and different road classifications can easily be instituted. Roads should never be closed, except for temporary management purposes. Common sense suggests that allowing access to the largest area possible spreads people out and creates the least amount of impact on any one area. (Individual, Loveland, CO - #A7090.15168)

**IN ASSOCIATION WITH OTHER ACTIONS**

Trail closures should not be associated with other actions including timber sales, mining, and livestock grazing. Corrective action should be taken where trail closures in the past have resulted from these sorts of past actions. Loss of motorized trails as a result of past timber sales should be mitigated by connecting old and new travel ways to create a loop system. (Organization, Helena, MT - #A13226.91211)

**1000. Public Concern: The Forest Service should not use the fact that roads are not maintained properly as an excuse to decommission them.**

As for the argument that many of these roads are not maintained properly or that there isn't the funding for maintaining roads just doesn't hold water with me. I have been a user of many "back country roads" in Colorado since the early 70s. There has been little to no maintenance done on these roads during that time and the areas have not suffered from it. (Individual, Boulder, CO - #A4480.45500)

**BECAUSE PRIMITIVE TRACKS ARE MORE FUN TO DRIVE THAN HIGH-SPEED ROUTES**

However, please don't forget that driving on the national forests is one of the most popular of recreation activities. This doesn't required high road standards. In fact, primitive tracks are more fun to drive than the high-speed routes. Don't assume a road should be obliterated just because it isn't high standard. Many of these routes require little maintenance and are causing no significant resource damage. Find out what the user public thinks before embarking on any more road obliteration initiatives. (Individual, Boise, ID - #A5165.90000)

**1001. Public Concern: The Forest Service should remove all gates on federal land.**

Take out all Forest Service gates. (Individual, No Address - #A18775.90100)

**1002. Public Concern: The Forest Service should not obliterate bridges.****WHERE ROADS ARE ALREADY PRESENT**

No more roads, and don't tear down bridges with roads already there. (Individual, Wapiti, WY - A7385.90130)

## Natural Resources General

### Summary

**General Comments** – Management of natural resources is a topic of comment to a number of respondents. Numerous individuals urge the Forest Service to responsibly manage natural resources—as an impartial advocate for the public good; to protect areas not yet damaged; to preserve resources fundamental to our survival, such as water and air; and to sustain the population and ecological balance of the planet. On a similar note, a number of respondents urge the Forest Service to make sound resource management decisions based on science, on expert opinion, on new technology, and on best management practices. Some individuals suggest specifically that the Forest Service should promote future sustainable yields in management of roadless areas—by implementing sustainable management practices; by defining areas where sustained yield will be the management objective; by harvesting areas that have already been cultivated; or by shifting to forestry practices outlined by the Pacific Northwest Research Station.

One of the most common assertions is that the Forest Service should seek to prevent further degradation of roadless areas and natural resources. Respondents suggest that further degradation can be prevented by encouraging conservation and recycling, and by developing alternative forms of energy. A number of individuals remark that there is no justification for natural resource development in roadless areas anyway inasmuch as these areas account for very little of the nation's timber, oil, and gas resources. Further, assert some, allowing resource uses only sets the precedent for more commodity activities.

One association is concerned that the Roadless Area Conservation Rule would make it difficult to meet resource requirements for the future. According to this respondent the present and future

national consumption need far out strips what the national forests can supply, a product they are suppose to supply. This person believes the Forest Service can meet the challenge but not without professional active management of all lands.

**Adequacy of Analysis** – One organization suggests the Forest Service evaluate the cumulative impacts of road closures on such things as fire and timber management and firewood gathering. According to another respondent, the Agency should determine when land use activities are approaching the management threshold in forest plans in order to ensure resource sustainability and maintenance of land management continuity.

**Funding** – An individual suggests the Forest Service fund the development of better technology in order to aid in resource conservation.

**Natural Resource Management** – Some respondents comment that, in general, natural resource management should be allowed. A few respondents assert that resource management activities should be carried out with temporary roads which are closed and revegetated following completion of work. According to others, the Forest Service should allow regulated removal of forest products which does not require road building or inflict environmental damage, such as ginseng and morel harvest. Respondents who state that natural resource management should be allowed, however, direct their comments to specific activities; these comments will be summarized in the sections to follow.

Of those respondents who address natural resource management, a number believe that it should be prohibited or restricted. Respondents state that the Forest Service should prohibit active management in roadless areas—because of public support for the Roadless Area Conservation Rule; because commodity use and exploration and wilderness preservation are mutually exclusive; because of the need to act for the long term; and because of the intrinsic value of forests. Some individuals suggest, moreover, that commodity production is not the best use of public lands. One individual believes that society has decided that these lands should be used to preserve and recreate on, not as a commodity resource. Finally, some say that the Forest Service should encourage the development of environmentally sound alternatives to logging and mining, and should close land previously opened to commercial interests.

### *Natural Resources Management General*

#### **1003. Public Concern: The Forest Service should responsibly manage natural resources.**

##### **AS AN IMPARTIAL ADVOCATE FOR THE PUBLIC GOOD**

The role of the government should be as a dispassionate and impartial advocate for the public good. Exploitation for the enrichment of individuals or corporations should not be permitted. As much as possible the role of the government in the management of these resources should be shielded from the transitory political whims of unscrupulous politicians. (Individual, No Address - #A460.12100)

##### **TO PROTECT AREAS NOT YET DAMAGED**

As a former employee of the Idaho State Department of Lands, I am well aware of the need to maintain already constructed roads, but it is up to the government to protect the areas of the United States not yet damaged by the incursions of the timber and mining industry. (Individual, Bismarck, ND - #A139.12100)

### **TO PRESERVE RESOURCES FUNDAMENTAL TO OUR SURVIVAL**

These concerns have resulted in federal legislation like the Clean Water and Air Acts, the Endangered Species Act, now the Roadless Rule because local and state entities tend to deplete resources for their own specific economic needs, ignoring the long-term and cumulative impacts to the environment as a whole. Resources such as forests, water, and air cross local and state boundaries and overuse by one entity usually negatively impacts citizens in another area. Since these resources are fundamental to the survival of us all, they have become and should continue to be regulated by the federal government. (Individual, Klamath Falls, OR - #A1035.12100)

### **TO SUSTAIN THE POPULATION AND ECOLOGICAL BALANCE OF THE PLANET**

I am not opposed to use of our natural resources for the public good. But this should be done without any more damage to the natural environment that is left on this planet. The days of unabated clear-cut logging, strip mining, irresponsible drilling, and the use of dangerous chemicals to extract resources from the land are OVER and people still doing any of these things need to be prosecuted and removed from that industry. The ecosystem cannot take anymore and still sustain the population and ecological balance of the planet. (Individual, Bonita Springs, FL - #A1718.65000)

### **BY MANAGING NON-WILDERNESS LANDS WITH VARYING DEGREES OF INTENSITY, DEPENDING ON RESOURCE POTENTIAL**

Non-wilderness lands should be managed with varying degrees of intensity depending on timber growing potential and other non-timber uses and values. (Individual, Evergreen, CO - #A19178.65200)

## **1004. Public Concern: The Forest Service should make sound resource management decisions.**

### **BASED ON SCIENCE**

In this community, fear of wildfire is understandably great. It is also manipulated by industry to whip people into a frenzy of believing wildfire is best avoided by logging. Again, I believe the Forest Service must implement science-based fire management plans (which I believe they are doing) and offer educational outreach on this topic to counter the hysteria that industry promulgates. A significant part of such education should be the urging of communities and individual homeowners to take responsibility for protecting themselves against wildfire. (Individual, Portola, CA - #A695.30000)

How should inventoried roadless areas be managed to provide for healthy forests, including protection from severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreaks?

Use common sense. We should continue to address these issues with science, speed, and efficient decision-making processes. People want Roadless areas protected, but if you need to build a road to solve a problem that, unchecked, might destroy the whole area, then people will want you to do that. There's enough flexibility built into Roadless to address these issues with the best solutions available. (Individual, Meridian, ID - #A1683.30000)

### **BASED ON EXPERT OPINION**

This is a decision that needs to be made by experts in maintaining wilderness areas, and not by foresters eager to harvest public land. Nor by corporations eager to spend tax dollars to assist in making money for their personal gain, and not by politicians looking for payoffs from corporate coffers for their election campaigns. The January 12<sup>th</sup> rule as documented contains exceptions and clarifications for this question. (Individual, Portland, OR - #A3660.30000)

### **BASED ON NEW TECHNOLOGY**

The IRAs should be protected with as much priority as they are now. New technologies, methods, and science should continually be applied to improve the protection. Public-awareness of the issues and problems is the best tool we have to keeping and improving the health of our forests. Ultimately, every decision regarding development and usage of our forests is based on that awareness. (Individual, No Address - #A594.30100)

Where logging is allowed, it should be done with Best Available Technology minimize the impact of such cutting. People who log in a destructive way (generating water pollution, poorly constructed roads, failure to follow aesthetic guidelines for ridge cutting, etc.) should be thoroughly punished and prevented from making a living this way.

There is good logging and bad logging. Logging that permanently scars a mountain is BAD logging. Take a look at Cheat Mountain in West Virginia; it is all cut to pieces from logging in the first half of this century. No regard was given to the lasting damage that was done removing spruce logs from the area. The folks that did that logging did not really know any better. The better class of loggers today DO know how to do a minimum impact job in the woods. Best practices should be more than “suggested,” especially on Federal lands. (Individual, Covington, VA - #A5294.65280)

#### **BASED ON BEST MANAGEMENT PRACTICES**

Any ‘management’ should be based on best forestry practices as determined by science and not economics. (Individual, Tucson, AZ - #A872.30100)

### **1005. Public Concern: The Forest Service should promote future sustainable yields in management of roadless areas.**

#### **BY IMPLEMENTING SUSTAINABLE MANAGEMENT PRACTICES**

There is plenty of information that already exists on how to sustainably manage forests (for example, the Forest Stewardship Council certification program.) I would encourage you to explore these resources for ideas on how to better manage the areas of our forests that remain open to the harvesting of natural resources. Implementing sustainable management practices is a win-win situation—it will benefit both industry and the people of the United States. (Individual, Detroit, MI - #A1429.65280)

#### **BY DEFINING AREAS WHERE SUSTAINED YIELD WILL BE THE MANAGEMENT OBJECTIVE**

Define areas where sustained yield will be the management objective. (Individual, Kalispell, MT - #A3380.65270)

#### **BY HARVESTING AREAS THAT HAVE ALREADY BEEN CULTIVATED**

Sustainability means logging areas that have already been cultivated. We do not need to log every last stand of old growth. Let’s leave some of our forests pristine for future generations. These forests belong to all of us, not just powerful timber and mining interests. (Individual, Portland, OR - #A1489.65220)

#### **BY SHIFTING TO FORESTRY PRACTICES OUTLINED BY THE PACIFIC NORTHWEST RESEARCH STATION**

The Forest Service already manages a huge matrix of forest roads and second growth forests. These forests should be used to continue to produce the types of wood and forest products that our country depends on. Also, the Forest Service should shift to sustainable alternative forestry such as has been outlined by your Pacific Northwest Research Station. (Individual, Olympia, WA - #A580.65230)

### **1006. Public Concern: The Forest Service should prevent further degradation of roadless areas and natural resources.**

Roads bring in people to use up the nonrenewable resources in ways that destroy the earth, such as logging, mining, building malls and developments. There should be areas where these things can be strictly kept out. (Individual, Berkeley, CA - #A497.65000)

This rule is not extreme - 70% of our national forests have already been roaded, logged, mined, and otherwise exploited for the short-term profits of the logging, mining, and fossil fuel industries, with taxpayers footing the bill for the road constructions. (Individual, Salt Lake City, UT - #A1325.65000)

The appropriate role of local forest planning as required by NFMA is to safeguard the treasures of natural-world’s resources from creeping, universal, ocean-to-ocean-Canadian-border-to-Mexican-border industrialization. (Individual, No Address - #A536.65000)

**BY ENCOURAGING CONSERVATION AND RECYCLING**

Enough is enough, if we need resources, let's conserve, it's the only sustainable way to do things, and it will have to be done sooner or later, may as well do it before destroying the environment and losing our 'national treasure' or whatever term is used by politicians. (Individual, Santa Rosa, CA - #A4421.65000)

Why can't the government concentrate on getting more recycled materials to the public and stop allowing the continuous harvesting of the virgin forests? (Individual, Byron, CA - #A1311.65200)

I beg you to support recycling. Construction materials, which are made of recycled materials, are available and could replace much of the lumber we now use. (Individual, Castroville, CA - #A4167.65290)

I drove through Northern and Central California and Southern Oregon and witnessed the clear-cutting that the logging industry does to the hillsides and mountainsides of forests. Despite the claim that "they will grow back" the areas are still bare because baby trees need larger trees to shade them and retain the soil so they can get a healthy start. So yes, once they are gone, they are gone forever. I see no need to strip what is left of our forests to satisfy the insatiable demands of indulgent consumers. What this country needs to do is plan for recycling and put it into effect, everywhere. There are many alternatives to destroying our forests and the ecological balance they provide. Let the public outcry be heard before it is too late to save the planet. (Individual, Cowan, TN - #A4177.65290)

I have seen devastating clear-cuts from the air over the Pacific Northwest, in the Inland Passage of Alaska, and in Idaho and Montana. The remaining forests need to be logged sustainably, which can be done if we cut back on logging and reuse/recycle, and conserve paper and wood products. For example, I am reusing an envelope to send this letter. The envelope may look tacky, but not as bad as a clear-cut. (Individual, Davis, CA - #A5154.65270)

**BY DEVELOPING ALTERNATIVE FORMS OF ENERGY**

I strongly support research and development of alternative forms of energy. Solar and thermal energy seem to be likely candidates. Technology in hybrid cars also seems to be a much better alternative to exploiting our wild lands. (Individual, No Address - #A4431.65000)

Obviously our current energy supply is a finite system, and we need to develop alternatives. Let's not destroy the little that we have left because we do not want the responsibility of changing our ways . . . (Individual, Normal, IL - #A328.65300)

Take for example drilling for oil in the Artic National Wildlife Refuge. The fact is we need to develop alternate types of energy, not drill in the last wild places. Once the oil is gone there, then what? This is the same for old growth forests. Loggers cry they need to log this last small % of old growth that is left. Why? Once they finish logging it at the end of five years time, then they are right back where they started, with no old growth forests to log! So then what do they do? Now is the time for miners and loggers to adjust to a new way to support themselves, before the old growth forest is gone. Now is the time to make our sustainable forests even better. Now is the time for Americans to look to the future and face the reality of finding different ways of life from logging, fishing, mining and drilling. (Individual, Port Angeles, WA - #A3672.65230)

Oil and gas resources are very limited in roadless areas. Based on an analysis by the US Geological Service, six of the states' roadless areas hold only 0.4% of the nations oil reserves, thereby demonstrating that the full costs of drilling outweighs the benefits. Hurting our protected land now for any "quick fix" would only hurt the nation more in the long run. Instead, conservation and alternative fuel sources, such as gas/electric hybrids and the like, should be emphasized. (Individual, No Address - #A928.65300)

If we use current technology wisely we will never have to cut another tree or drill another hole in the ground to obtain energy. Hydrogen, as an energy carrier can supply all of the energy we need without pollution and the environmental hazards of using oil, coal or natural gas. Let's stop the insanity and convert now. (Individual, Vestal, NY - #A3913.65300)

The current administration is beholden to big oil, the forest industry and the mining industry for their election. Only about six percent of the US timber comes from our national forest. The forest industry is determined to get the rest. And why must we pump the last barrel of oil when the handwriting is on the wall concerning our future energy sources. Worldwide the fastest growing source of energy for electricity production is wind. At Arlington, Wyoming stand 133 wind turbines and they currently produce enough electricity to supply most of western Wyoming. There are thousands of sites for wind farms in Wyoming and the nation. With only 66 turbines the wind farm at Arlington can supply the needs of Cheyenne, our largest city. Antelope and cattle graze beneath the turbines. The turbines are big and do not spin at speeds that will kill birds. In fact, the Arlington turbines have not killed any birds. This summer BMW and Honda introduce their hydrogen-powered cars. The exhaust is water. Wind and sun produced electricity can produce hydrogen from water in the process of electrolysis. The large envelope passive solar home of Vincent and Joyce Sindt in west Laramie, one of the coldest towns in the US, used \$26 in backup electricity and two cords of wood in heating the home for two years. In Japan and at other locations, solaria on the south sides of some homes supply all of the heat needed by the homes. On the edges of the window glass through a reverse meter into the power grid and the homeowners collects a fee for the electricity the home produces. In many climates solaria and windy ridges can be our power plants. We can save the Arctic Wildlife Reserve, the intact national forests and watch atmospheric carbon dioxide return to the level that sustains our stable climatic condition. Save our roadless areas. (Professional Society, Laramie, WY - #A6282.65300)

### **1007. Public Concern: The Forest Service should provide national oversight of forest management.**

#### **IN DECIDING WHERE TIMBER SALES AND OTHER COMMERCIAL OPERATIONS CAN TAKE PLACE**

I believe that local districts should be involved in protection and management, but that there needs to be significant national oversight in deciding where timber sales and other commercial interests can take place. I believe this is too political and economic of an issue to be decided locally. (Individual, Fairhaven, MA - #A19657.13130)

### **1008. Public Concern: The Forest Service should consider that roadless areas account for very little of the nation's timber, oil, and gas resources.**

Roadless areas provide less than .2% of the nation's timber supply and less than .4% of the nation's oil resources and .6% of natural gas resources. The rule has no impact on access to inholdings and no impact on the large areas of the National Forest that are already roaded. The rule will only protect the remaining 31% of the National Forests, which have been preserved thus far because of topography, lack of economic resources, recreational benefits, and wildlife and watershed values. These forests comprising 31% of the National Forest should be preserved for future generations. (Individual, Seattle, WA - #A8230.10150)

Protecting roadless areas will not have a significant impact on the nation's energy supplies. Roadless areas in the Rocky Mountains are not a major source of oil and gas; these areas contain only four-tenths of one percent of America's oil resources and six-tenths of one percent of America's gas resources. (Individual, The Plains, VA - #A6201.65000)

Roadless areas provide less than two-tenths of one percent of the U.S. timber supply, four-tenths of one percent of the U.S. oil resources and six-tenths of one percent of U.S. gas resources. (Individual, Valley, WA - #A6278.65241)

The national forests provide only 5% of our timber and less than 5% of that comes from the proposed roadless areas. The Roadless Rule affects less than one-quarter of 1% of the nation's timber supply. (Individual, Wasco, CA - #A1663.65241)

The commodity values in roadless areas are not significant. Roadless areas provide less than two-tenths of one percent of the nation's timber supply, and commercial logging of roadless areas would require large taxpayer subsidies. Similarly, roadless areas in the Rocky Mountains contain only four-tenths of one percent of the nation's oil resources and six-tenths of one percent of U.S. gas resources. (Individual, Markleeville, CA - #A1067.45100)

To answer this question, I would like to quote previous Forest Service Chief Mike Dombeck from his January 5, 2001 speech "Roadless Area Conservation: An investment for Future Generations": "We presently supply less than 4 percent of the nation's timber from all of our national forestlands combined. Of that modest 4 percent only a tiny fraction - 6 percent - will be affected by roadless area conservation. That's one quarter of 1 percent. Similarly, National Forests supply less than 4 tenths of one percent of the nation's oil and gas, and far less from roadless areas. Is it worth one-quarter of 1 percent of our nation's timber supply, or a fraction of a fraction of our oil and gas to protect 58.5 million acres of wild and unfragmented land in perpetuity?" (Individual, Laramie, WY - #A1.45100)

**1009. Public Concern: The Forest Service should recognize that allowing active management sets the precedent for more resource removal.**

In a country that is based strongly on capitalism, a movement to build roads and allow logging and other industries that take resources from these forests could very easily turn into a stepping stone for other industries to move into such areas. History has proven that wealthy corporations and industries tend to get their way over a long period of time of pushing an issue with their money. This issue should have nothing to do with money. (Individual, No Address - #A30028.15000)

**1010. Public Concern: The Forest Service should support legislation that regulates natural resource consumption.**

People need to realize that resources are precious, and the only way to do this is through laws that limit their consumption. (Individual, No Address - #A6795.65000)

**1011. Public Concern: The Forest Service should reach decisions on development proposals in a timely manner.**

Lander County would encourage the Forest Service to expedite all development proposals along the timeframes needed to push through the rule. The evaluation of the rule under the NEPA process showed that the Forest Service is capable of completing an EIS within a year. We hope that all current and future mining, timber and other resource development are afforded the same swift and decisive action. (Elected Official, Battle Mountain, NV - #A27730.14420)

**1012. Public Concern: The Forest Service should limit active management while accommodating reasonable local practices.**

The appropriate role of the local forest-planning unit, such as yourself, is to adhere to the national rules IN SO FAR AS POSSIBLE. While you must work hard to avoid any piece-meal, local changes that could have long range damaging effects, you also have to do what is necessary to accommodate some local quirk. For example, while no new roads should be built into these areas, if they already have an old logging rail line that the snowmobilers have been using for decades, you should not try to close it. Rather, you might want to clean it up a little so that it becomes a more effective firebreak, but not enough to encourage anyone with a 4 x 4 PU to go roaring down it. In other words, limit development as much as possible but accommodate reasonable local practices. (Individual, Hudsonville, MI - #A4928.15111)

**1013. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule will make it difficult to meet resource requirements for the future.**

The rule is the result of a well orchestrated but ill-conceived effort by preservationist groups to dictate land use allocations of unfamiliar real estate. It not only is a mockery of the basic premise of N.E.P.A, it violates the concepts inherent in the Forest and Rangeland Renewable Resources Planning Act. (i.e. “the nation maintains a conservation posture that will meet the requirement of our people in perpetuity.”) Conservation is in opposition to preservation. The U.S. population is predicted to double by the year 2050 and our national forests are expected to provide raw material for the populace. The forests can meet this challenge but not without professional management, unmanaged lands will produce nothing for future generations except major fuel bodies to create conflagrations such as are occurring now. (Association, Eureka, CA - #A17718.10141)

**1014. Public Concern: The Forest Service should monitor resource use.**

Resource extraction should be monitored to have the least impact—such as buffer zones next to rivers and lakes. A team approach to resource extraction such as wildlife biologists having critical in-put and power over industry would be a start. I keep hearing “sound science”, but it seems the scientists are always hushed when industry wants their way on our public lands. (Individual, Tustin, MI - #A5276.14500)

**MAINTAIN ACCESS SO THE PUBLIC CAN MONITOR RESOURCE MANAGEMENT**

The USFS published a recreation agenda in 2000. It is almost never mentioned. It is like the agenda does not exist. We feel as motorized recreational users of the forests that this must have been printed to pacify us and nothing is really going to change. One thing about rules like the Clinton-Gore roadless rule is, if you lock people out, they can not see how their natural resources are being mismanaged. (Organization, Okanogan, WA - #A6026.65000)

**1015. Public Concern: The Forest Service should develop a national roadless rule.****BECAUSE IT WILL STIMULATE NEW INDUSTRY INNOVATIONS**

I believe conservation is ultimately the best approach to take, protecting natural resources can stimulate new innovations in industries that otherwise would damage or destroy environments. (Individual, No Address - #A8998.10110)

*Adequacy of Analysis***1016. Public Concern: The Forest Service should evaluate the cumulative impacts of road closures.****ON FIRE AND TIMBER MANAGEMENT, AND FIREWOOD GATHERING**

The environmental document must evaluate the impact that the proposed motorized road and trail closures will have on fire management, home heating, and timber management. The environmental document must also include an analysis of the benefits to the public from the gathering of deadfall for firewood from each of the roads and trails proposed for closure. These analyses are especially significant following a devastating fire season and a period of rising energy costs. The closure of roads and trails is occurring at a large scale throughout the national forests. Therefore, the environmental document must evaluate the cumulative impacts of motorized road and trail closures on forest fire management, timber management, and firewood gathering. (Organization, Helena, MT - #A13226.65290)

**1017. Public Concern: The Forest Service should determine when land use activities are approaching a management threshold.**

**A THRESHOLD ESTABLISHED IN THE FOREST PLAN TO ENSURE RESOURCE SUSTAINABILITY AND MAINTENANCE OF LAND MANAGEMENT CONTINUITY**

Further, we are opposed to providing “opportunities for the involvement of others, mainly the general public, in monitoring and evaluation” activities. We do not object to promoting and seeking stronger coordination with other federal agencies, state, local and tribal governments, in fact we encourage it as a means of streamlining the planning process. However, the FS is overstepping reasonableness by depending upon those without express technical expertise in the issues, i.e., scientific and academic communities and “other interested parties,” to conduct monitoring activities that are the responsibility of the FS. Asking the public and academia to participate in monitoring procedures will merely invite controversy and increased polarization. We recognize that the FS is attempting to offer added opportunities for involvement in managing the NFS, but active participation by these entities will complicate and delay the process. We urge that the FS adopt the means for determining when land use activities are approaching the management threshold established in the plan to ensure resource sustainability and land management continuity are maintained. As such, integrated monitoring must be done on all resource activities to get a true picture of actual cumulative effects. It is crucial for the FS to avoid responding to new development proposals with knee-jerk reactions to halt all activity pending completion of a new environmental impact statement. With improved monitoring activities, the FS will improve its resource database and should not be taken by surprise. (Business, Denver, CO - #A25688.65300)

*Funding*

**1018. Public Concern: The Forest Service should fund the development of better technology.**

**TO AID IN RESOURCE CONSERVATION**

Please spend the money on better technology, not more drilling. There must be a way to build more efficient engines and not promote SUVs for everyday city driving. I find it hard to believe in today’s day and time, with human cloning being a possibility, that we cannot do this. It is sad that we are going to totally deplete our planet of its resources and animals all in the name of money. Haven’t we done enough? How greedy do we have to get? (Individual, Houston, TX - #A10360.50100)

*Allow Active Natural Resource Management*

**1019. Public Concern: The Forest Service should construct temporary roads for resource management activities.**

Helicopter, cable or forwarder removal of timber is not feasible or practical in the vast majority of cases where timber needs to be removed, temporary roads and skid trails should be allowed so that the Forest Service can prudently manage the resources under their jurisdiction. After the work is completed, the temporary roads and skid trails should be closed and planted to minimize erosion and enhance wildlife habitat. (Organization, Edgefield, SC - #A4829.90120)

Inventoried roadless areas are unique only in that they were inventoried during the wilderness study era. I do not believe that all Forest Service land needs to have a permanent road system but I do believe that it is a crying shame to allow resources to go to waste due to the lack of management (wood fiber to burn or rot due to disease). The practice of constructing temporary roads for management activities and putting them to bed after it is used is a much-underused practice. (Individual, Dayton, WY - #A5074.90121)

**1020. Public Concern: The Forest Service should allow regulated removal of forest products.****WHICH DOES NOT REQUIRE ROAD BUILDING OR INFLICT ENVIRONMENTAL DAMAGE, SUCH AS GINSENG AND MOREL HARVEST**

Allow recreational activities and regulated harvesting of forest products that do not require road building or inflict major damage on the environment. Example, ginseng permits, morel permits, harvesting of seeds for propagation of native plants, etc. (Individual, No Address - #A23569.90100)

***Do Not Allow/Restrict Active Natural Resource Management*****1021. Public Concern: The Forest Service should prohibit resource removal in roadless areas.**

Protecting roadless areas in our national forests is so basic an idea. There was ample scientific, moral and environmental reason for the rule to be passed in the first place. Lets not buckle now to industry after much hard work has already been done. It's on your conscience. What kind of country we leave for our children. Please do the right thing. (Individual, Kittery, ME - #A4852.10111)

Please respect the voice of the people, not the voice of industry. Roadless lands are the few lands left in America where human development does not dominate the landscape. The value of these lands for wildlife, natural processes, ourselves and our children are immeasurable. In an increasingly developed world, roadless areas will only become more and more important to our well being and that of the planet. (Individual, Missoula, MT - #A5313.10111)

**BECAUSE OF OVERWHELMING PUBLIC SUPPORT FOR THE ROADLESS AREA CONSERVATION RULE**

I was greatly relieved when the Roadless Area Conservation Rule was established, and very frustrated to hear that it's now in jeopardy. I believe it was strongly supported by a wide variety of people, and that support has not changed. Perhaps the current administration believes that circumstances have changed that necessitate alterations. But circumstances certainly haven't changed enough to make it a good idea to open the last of America's wild national forests to drilling, mining and logging. Please weigh carefully the overwhelming support for the protections that were put in place in January, and resist the temptation to yield to industry pressures. The decision is a critical one. (Individual, Westford, MA - #A366.10110)

We and millions of other Americans want a stop put to the destruction of our remaining natural areas, and we have demonstrated that desire time and time again. I hope the responses the Forest Service receives from individual American citizens about this unnecessary and redundant public comment period convince the Forest Service that we are serious—protect the roadless areas from any further development and exploitation. (Individual, Macomb, IL - #A95.10111)

Please, please preserve the Forest Service's Roadless Area Conservation Rule as it now stands. The roadless area conservation rule represents the desires of the American people, and to alter it in order to please a small number of business elites would be criminal. (Individual, Davis, CA - #A170.10111)

**BECAUSE INDUSTRIAL EXPLORATION AND WILDERNESS PRESERVATION ARE MUTUALLY EXCLUSIVE**

Please support the Forest Service's Roadless Area Conservation Rule. No amendments, alterations, or exceptions of this policy should be allowed.

Surely you are aware that this policy, as it now stands, is the result of more than 600 public hearings and 1.6 million public comments, 95% of which support the strongest protection. The wishes of the American people to protect our natural resources must not be ignored in favor of corporate profits or government alliances.

In the words of the Heritage Forest campaign, the rule represents a balanced approach to forest conservation, saving the last 30% of America's wild national forests from logging mining, and drilling—activities already allowed on most national forest lands. Industrial exploration and wilderness preservation are mutually exclusive goals; therefore, we must protect our national forests and conservation spaces from industry exploitation. To alter or dismiss the Roadless Area Conservation Rule would be to allow, indeed to encourage, the very exploitation that Americans have unequivocally shown they do not desire. Furthermore, the Roadless Area Conservation Rule already adequately addresses issues of fire management, forest health, access, and local input. (Individual, Conyers, GA - #A342.10150)

#### **BECAUSE OF THE NEED TO ACT FOR THE LONG TERM**

It is a great privilege to live in Oregon, where undeveloped public lands are so easily accessible. The forests near the Columbia River Gorge, on Mount Hood, in the Gifford Pinchot, the Cascade Mountains, the Deschutes, Fremont or Malheur National Forests, the Eagle Cap wilderness of the Wallows and the botanically rich Siskiyou, are extraordinary places that deserve complete protection. As an avid hiker and one who studies the workings of ecosystems, I have come to learn both the biological and aesthetic importance of these places. To sacrifice our few remaining National Forest roadless areas for limited financial gain is a loss that can never be restored. I strongly urge the Bush administration to act for the long term and preserve these areas for future generations and the health of the entire world. (Individual, Portland, OR - #A3679.10110)

The roadless rule while being an irritation to some, that has brought lawsuits and criticism is one of the best things to occur in most of our lifetimes in regard to public land. With the rule we can proudly speak of preservation for future generations to come, something often spoken, then thrown by the wayside. A roadless rule is not a bad thing. Where enforcement of vehicle bans have taken place, the hunting community for example, complained about it. Later they found that the hunting experience was enhanced by it. I believe the roadless rule will be appreciated by many over time. Even many who don't see it that way now. (Individual, Coulterville, IL - #A114.10111)

#### **BECAUSE OF THE INTRINSIC VALUE OF FORESTS**

The most important value of a forest, the one that should be protected above all else, is its value as the living embodiment of millions of years of evolutionary development which has resulted in a healthy, functional community of plants, animals, predators, and prey which is sustained by its efficient, and often beautiful, use of the energy it receives from the sun. The profusion of plants, funguses, insects, and higher animals have all found a place in this community where they can be nourished by the flow of energy from plant to grazer to carnivore, and by so doing, thrive and perpetuate their kind. That it all works out, and works out in such varied and fascinating abundance is miraculous. If we, as a people, cannot honor and protect a portion of something as wondrous as a forest, with all its teeming life, if we can value it only for the monetary gain to be obtained from removing some of its parts, then we, as a people, have failed to mature beyond the frontier mentality of heedless exploitation, and have failed to become responsible caretakers of a precious gift which we do not yet even fully understand. There is much yet to be learned from forests, and it would be a tragedy if they were all converted to sterile tree farms as has been done on industry owned lands.

This should not be construed as advocating that all national forest land should be set aside. What it does advocate is that some part of every forest type should not be exploited, and that the inventoried roadless areas should be included in that part. (Individual, Dallas, OR - #A3697.10110)

#### **BY ADDING A SUPPLEMENTAL PROHIBITION TO THE EXISTING ROADLESS AREA CONSERVATION RULE**

Mining, grazing, logging and all on-road and off-road vehicle use should be prohibited in these areas. As previously stated, it would be neater to prohibit this by adding the supplemental prohibition to the existing rule, rather than wait for plan revisions across the country. (The Chattahoochee has been working on its revision for better than six years now, and appears to need another two years before completion.) As exists today, traditional access to roadless areas by hunters, hikers, fishermen should continue to be expressly allowed. (Individual, Atlanta, GA - #A26430.90000)

**1022. Public Concern: The Forest Service should not use maintenance of private property access as an excuse to allow resource removal.**

Limited access to property by those who own property in roadless areas is not the problem!! This is a subterfuge for allowing access to any and all that wish to exploit the area. (Individual, No Address - #A1728.40000)

**1023. Public Concern: The Forest Service should recognize that commodity production is not the best use of public lands.**

Production of forest commodities is no longer the highest and best use of our public lands. We have collectively decided as a society that we wish to preserve wildlife habitat and dispersed recreational opportunities. This is best done by leaving all the remaining roadless areas roadless, and by restoring other public lands with significant habitat potential to the best condition possible. (Individual, Williams, OR - #A1911.65230)

**DUE TO THE HARSH CONDITIONS IN MANY ROADLESS AREAS**

One point that must be addressed is that roadless areas cannot be viewed as the only areas that have resources. Yet, the questions about roadless areas you have asked us to answer lead one to infer that only in roadless areas do we find any resources.

Such a view is ludicrous and, in fact, the opposite of the truth. Less than 10% of the lower 48 states is anything resembling a wild or unroaded condition. National Forest roadless areas comprise an even smaller percentage. These areas are the least desirable from the standpoint of commodity production because of their lack of commodity resources, their remoteness, harsh environments and other factors.

To suggest that local economies or the nation need to extract commodities from these areas is ridiculous. Even if these areas held important commodities, the mere fact that these areas comprise a small percentage of the land base indicates that those commodities would be gone in a flash. Any economy dependent on commodity extraction from roadless areas is doomed to failure. (Organization, Moscow, ID - #A22654.65000)

**1024. Public Concern: The Forest Service should prohibit the removal of forest products.****NATURAL MATERIALS**

Those activities that inherently damage the natural environment of a roadless area should be prohibited in roadless areas. These include the use of motorized equipment and vehicles and the gathering or removal of naturally occurring materials. (Individual, Denver, CO - #A17164.90110)

**SECONDARY FOREST PRODUCTS**

Activities that should be expressly prohibited are the use of off-road vehicles in roadless areas, the harvesting of secondary forest products including but not limited to mushrooms and mining of any sort. (Individual, Salem, OR - #A13948.91221)

**1025. Public Concern: The Forest Service should replace logging and mining with environmentally sound alternatives.**

The Initiative is badly flawed in that there is no provision to replace the demand for these activities with acceptable alternatives. Logging and mining cannot simply be prohibited unless the demand is reduced or replaced with an (hopefully environmentally friendly) alternative. Otherwise, logging and mining will go off-shore to countries with lower environmental standards than ours. The Earth will suffer even greater loss, in the long run. (Individual, Sumter, SC - #A6210.50400)

## 1026. Public Concern: The Forest Service should close land previously opened to commercial interests.

### BECAUSE IT IS TIME TO STOP DESTROYING OUR NATURAL RESOURCES

In addition, I feel that land that has already been opened to business interests be closed to them. We have consistently been destroying our natural resources in all areas and it is time that it is stopped. The waste in this country is shameful and a whole different attitude toward our environment and resources needs to be fostered. (Individual, Chicago, IL - #A4063.90110)

## 1027. Public Concern: The Forest Service should prohibit gardening of vegetation for commercial purposes.

The following activities should be completely prohibited in roadless areas: . . . gardening of vegetation for commercial purposes . . . (Individual, Port Angeles, WA - #A6179.90110)

## Timber Removal

### Summary

**General Comments** – A number of respondents assert that there is no justification for removing timber in roadless areas. Some state that timber companies already have an adequate timber supply, while others maintain that the Roadless Area Conservation Rule would decrease timber removal on federal lands by only two percent. The reason the Rule would have so little effect on overall timber production, people assert, is that most roadless areas are unsuitable for timber production—they are steep, remote, and the trees have little commercial value.

Some respondents also question the Forest Service’s management of timber. One Organization urges the Agency to recognize the conflict of interest in its management of timber whereby, this organization asserts, Forest Service employees are encouraged to approve timber sales whether they are in the best interests of the public or the environment or not. Another individual suggests that because roadless areas are difficult to access and expensive to harvest, the reason the government probably wants to keep these lands in the timber base is that growth on these lands offsets harvesting on other land. By keeping these lands in production, it allows the over cutting of suitable timber base lands. Further, some ask the Forest Service to explain why it is preparing and implementing timber removal projects in roadless areas given its expressed commitment to conserving wild forests.

Additionally, people suggest the Forest Service monitor timber removal, replant even-age management areas in order to avoid harvesting other areas, and encourage the development of alternatives to wood.

Other respondents do not question the justifiability of removing timber. They suggest that the Forest Service should collaborate with timber companies in the use of sustainable timber practices, and should consider public comment prior to timber sales. According to one individual, timber sales should be announced far enough in advance to allow for early public input, and then find a way not to have the sales held up by public outcry and lawsuits at the last minute.

**Adequacy of Analysis** – Respondents representing various interests suggest that further analysis is needed related to timber removal. One organization suggests the Forest Service analyze the impacts of removing land from sustained yield management. This respondent remarks, “We want to know the volume of timber that will be removed from sustained yield management, its market

value, the allowable sale quantity, and the potential jobs and income that might have been created if the lands had been managed under the sustained yield, multiple use mandate.” Another group suggests that “inasmuch as some options have been precluded by the roadless rule, during the evaluation of roadless areas it is no longer relevant to look at timber harvest potential during roadless evaluation.” According to one business, the Agency should analyze the impact of timber sales on lands adjacent to roadless areas, “as these sales have increased fire risk, resource damage and changed wildlife patterns on roaded and unroaded National Forest lands.” Finally, one individual asserts that the Agency should require logging companies to perform environmental impact studies in order to prevent environmental damage.

**Funding** – A few individuals comment that the Forest Service should not charge a fee for dead timber gathering permits and should not sell fiber.

**Timber Removal** – A number of respondents believe that the Forest Service should permit timber removal in roadless areas—because it would require more acres elsewhere to replace the potential timber volume in these areas; because of the centrality of wood products to our culture; and to sustain turkey farms. Others suggest that timber harvest only be allowed as part of ecological restoration efforts; as long as the Forest Service replaces each harvested tree with five planted trees; or as long as it is not commercialized.

People also suggest various methods by which timber removal ought to be accomplished. Suggestions include harvesting along roads, with temporary logging railroads, by helicopter, by horse, and by elephant. Some suggest the Forest Service focus on harvesting saw logs and small trees, harvesting small diameter timber from roaded areas, selective timber removal, or salvage timber sales. Several respondents suggest a number of specific areas where they say timber removal ought to be allowed, including specific states, counties, and forests, as well as private lands and areas that are already accessible by existing roads.

Some suggest the Forest Service consider a categorical exclusion for some routine activities, such as timber removal. One respondent urges the Agency to implement existing forest plans in order to meet harvest levels adopted during the forest planning process. Others remark that, in general, the Agency should support a sustainable timber industry—by supporting sustainable timber removal practices; by managing second growth in the Tongass National Forest; and by removing restrictions and limitations lobbied by special interests. Some suggest the Agency should allow timber removal on other forest lands to replace lost timber volumes due to roadless designations. Finally, a few individuals recommend that the Forest Service should not place restrictions on timber removal on privately owned forest lands adjacent to state and national forests—inasmuch as, one person argues, the Agency’s refusal to thin National Forest System lands will result in more wildfires—and should enlist the public to help clear and thin the forests in order to promote community and cultural involvement.

Other respondents urge the Forest Service to prohibit timber removal in roadless areas. Some mention particular methods of harvesting they say should not be allowed, such as helicopter logging, salvage logging, and even-age management. Others suggest specific places where they say it should be prohibited, including areas containing less than 50 percent suitable timber base. Another individual suggests that the Forest Service should prohibit timber companies from harvesting virgin timber on National Forest System lands. Finally, some assert that the Agency should stop preparing timber sales in the Tongass National Forest which are in violation of the Rule, and should adjust the annual sale quantity downward for national forests in general—to

prevent further biological and recreational problems in roaded areas, and to reflect the interests of special interests and small scale gatherers. (See also Chapter 6: Protecting Forests (Question 3): Timber Harvest.)

### *Timber Removal General*

#### **1028. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule.**

##### **TO PROVIDE FORESTRY PROFESSIONALS WITH ADEQUATE TIMBER REMOVAL OPTIONS**

By maintaining the roadless plan as we currently see it, you give forestry professionals across the nation a little working room. As you know, we forestry professionals exist in front of society's critical eye, which in turn makes professional public forest management very challenging. The roadless plan removes the "old growth debate" from its primacy, allowing us, the public foresters, the time and energy to develop management schemes for public natural resources that sustains them and sustains humanity.

Our job is only getting more difficult as the US population increases and per capita consumption does as well. Creative forestry is the only way to keep forests managed by professional foresters, and the roadless plan fits the bill. It is creative enough to have substantial public support from across the spectrum. (Individual, Corvallis, OR - #A27066.65230)

#### **1029. Public Concern: The Forest Service should consider that keeping roadless areas in the timberland base allows the over-cutting of more productive land.**

For growing timber, Forest Service lands are generally less productive than private land and roadless areas are the least productive of the FS land. Generally roadless lands are very difficult to access and road building would be very expensive. The big reason the government wants to keep these lands in the timberland base is that growth on these lands offsets harvesting on other land. By keeping these lands in the formula for determining how much wood can be cut, it allows the over cutting of better land. (Individual, Merion Station, PA - #A17478.65260)

#### **1030. Public Concern: The Forest Service should consider that timber companies have an adequate timber supply.**

##### **THEIR LARGEST CONCERNS ARE FOREIGN COMPETITION AND A GLUTTED MARKET**

I have worked for Pyramid Mountain Lumber in Seeley Lake, MT for 21 years. In that time I have heard endless complaints about how lack of available timber would cause the mill to close. The fact is however, that we have always been able to adequately source our mill and we continue to do so. The biggest enemy of the timber industry is foreign competition and a glutted market. (Individual, Condon, MT - #A22480.65210)

#### **1031. Public Concern: The Forest Service should collaborate with timber companies.**

##### **IN THE USE OF SUSTAINABLE TIMBER PRACTICES**

Locally, Hayward Lumber Company is providing leadership in the use of certified "green wood" and sustainable timber practices. I encourage you to contact Steve Brauneis with Hayward's Strategic Environmental Planning Division to learn more about their ideas and practices. (Business, Monterey, CA - #A7031.15152)

**1032. Public Concern: The Forest Service should consider that if it allows timber removal in roadless areas only by skid roads, it will not allow timber removal for long.**

**DUE TO THE ENVIRONMENTAL DAMAGE CAUSED BY SKID ROADS**

The only other way to log in roadless areas would be to use long skid roads (“non-road roads” according to the DEIS). Skid roads usually cause much more environmental damage than do properly constructed roads, so skid roads will likely cause more damage than road building. Due to that increased damage from skid roads, it is unlikely that the Forest Service would allow that for very long. Thus the Forest Service is being disingenuous by saying that logging will continue to the extent indicated in the IRAs. (Union, No Address - #A28881.65220)

**1033. Public Concern: The Forest Service should consider public comment prior to timber sales.**

Timber sale planning should be announced far enough in advance to allow for early comment, and not have the sales held up by public outcry and lawsuits at the last minute. (Individual, Payette, ID - #A1049.90512)

**1034. Public Concern: The Forest Service should consider that most roadless areas are unsuitable for timber removal.**

**BECAUSE THEY ARE STEEP, REMOTE, AND THE TREES HAVE LITTLE COMMERCIAL VALUE**

All lands suitable for logging are already roaded. Presently unroaded lands are the marginal areas without suitable trees for logging and/or lands unsuitable for logging due to terrain, and susceptibility to erosion. (Individual, Bozeman, MT - #A961.65261)

The BOTTOMLINE is that the roadless areas are not good timberlands or, at least, it is NOT COST-EFFECTIVE to timber them. They are either too steep or too remote, or both. If that were not so, they obviously would already have been timbered. Thus, timbering them now would not be in the best interests of the taxpayers. (Individual, Birmingham, AL - #A4991.65262)

I feel that the areas that are still roadless today are roadless for a reason. They are either too remote or too steep or have climatic/elevation features resulting in forests that are too slow growing to produce valuable timber. For the most part, the timber in these remaining roadless areas has too little commercial value to make it worth the costs associated with logging it, particularly the cost of building roads to reach the timber. These areas should be left alone for the wildlife that depends on these ecosystems. If thinning or insect/fire salvage is considered necessary, it should be done by helicopter only. (Individual, Missoula, MT - #A1695.65280)

Montana Logging Association representative Patrick Heffernan admitted that inventoried roadless areas were not the issue for their members. Forest Planners on the Flathead National Forest told me that they would not turn to the roadless areas for timber harvest for another 20-30 years in any event. What is the rush? What is the real issue here? It is not local input. The inventoried roadless areas in Montana are quite often mostly unsuitable for timber harvest by the agencies’ own analysis during the Reagan years. You may have made some of those determinations yourself on forests in our region. There has been plenty of input. Lets settle on the national rule published on 1/12/2001. (Organization, Missoula, MT - #A26424.10150)

**1035. Public Concern: The Forest Service should acknowledge that the Roadless Area Conservation Rule would decrease timber removal on federal lands by only two percent.**

This rule affects 58.5 million acres of federal forestlands, which amount to 2% of the US land base and 31% of the Forest Service land base. Implementation of the Roadless Rule would decrease the timber harvest on federal lands by only 2%. (Elected Official, Nevada City, CA - #A12058.65200)

**1036. Public Concern: The Forest Service should replant clear-cut areas.**

**TO AVOID HARVESTING OTHER AREAS**

Yes, timber sales do support our library here in Jefferson County, WA. But we do not need to invade the remains of the Okanagon National Forest to pay for libraries. Why not replant the clearcuts? Then the lumber companies can restabilize and reuse those old roads. (Individual, Port Townsend, WA - #A4965.10111)

**1037. Public Concern: The Forest Service should monitor timber removal.**

Use GPS and frequent audits to enforce any timber sales to eliminate over-cutting.

Post cameras at access points to photograph vehicles entering and leaving to discourage timber theft as well as illegal use of our forests. (Individual, Olympia, WA - #A441.65200)

**1038. Public Concern: The Forest Service should encourage the development of alternatives to wood.**

We must research and develop other sources of building materials. (Individual, Oakland, CA - #A3602.65290)

Why this country does not take advantage of industrial hemp is a mystery. We could save so many forests by using industrial hemp for our paper products only. Let the paper mills retool and use hemp. It grows quickly and cheaply. If hemp were used for just our newspapers and toilet paper alone many trees could be saved. Please take the use of industrial hemp under serious consideration. Nobody gets "high" on this. (Individual, North Hampton, MA - #A4309.65290)

*There are alternatives* to logging, both for forests and for loggers. In terms of wood products there are renewable pulp sources that will not affect the old growth and substantial returning growth already present in our forests; there are building materials that are more durable and more energy efficient than wood—let us make use of them. The logging industry has a right to its incomes, but when an industry becomes unviable, say as coal mining and its dependent steel production did in the eastern U.S. at mid-century, it's time to move on. (Individual, South Lake Tahoe, CA - #A5107.65290)

Instead of logging, why not investigate an alternative for wood, perhaps bamboo? Or a composite so wood waste can be utilized? How about retro planning already planned developments so that more people can live in areas that have already been established? Invest that money to make them attractive. I am mortified that anyone can determine the last vestiges of pristine wilderness are not valuable enough to preserve. This in itself is a sign that my tax dollars are not going towards education. Please do the right thing and preserve the Forest Service's Roadless Area Conservation Rule as it stands now. (Individual, Kenmore, WA - #A4061.65290)

There is a growing market for the use of building products and "lumber" made from recycled plastic containers, such as 2-liter soda bottles and milk bottles. Please consider that we must save what little is left, and make re-use of what we already used. (Individual, San Diego, CA - #A85.50000)

**1039. Public Concern: The Forest Service should recognize the conflict of interest involved in its management of timber.**

“The appropriate role of local forest planning” is to recognize that there is an overwhelming conflict of economic interest—where forest service employees are mandated to “get out the cut” to maintain their jobs—even though most timber sales are not in the public interest, are below-cost timber sales, and do damage to important wildlife habitat and fisheries. (Organization, Sheridan, WY - #A17593.12200)

**1040. Public Concern: The Forest Service should explain why it is preparing and implementing timber removal projects in roadless areas.****GIVEN ITS EXPRESSED COMMITMENT TO CONSERVING WILD FORESTS**

Logging projects on roadless areas in the Sierra Nevada threaten botanically significant areas, imperiled fish and wildlife, and scenic and recreation values. It is fair to ask then, why—as the Service expresses [its] commitment to conserving wild forests the agency is preparing and implementing logging projects in roadless areas? (Individual, Mountain View, CA - #A13532.50000)

*Adequacy of Analysis***1041. Public Concern: The Forest Service should analyze the impacts of removing land from sustained yield management.**

We want to know the volume of timber that will be removed from sustained yield management, its market value, the allowable sale quantity, and the potential jobs and income that might have been created if the lands had been managed under the sustained yield, multiple use mandate. (Organization, Missoula, MT - #A28141.65200)

**1042. Public Concern: The Forest Service should not evaluate timber removal during roadless evaluation**

Inasmuch as some options have been precluded by the roadless rule, during the evaluation of roadless areas it is no longer relevant to look at timber harvest potential during roadless evaluation. (Civic Group, Roanoke, VA - #A1713.45521)

**1043. Public Concern: The Forest Service should analyze the impact of timber sales on lands adjacent to roadless areas.**

The impacts of the timber sale programs on lands adjacent to roadless areas must be analyzed, as these sales have increased fire risk, resource damage and changed wildlife patterns on roaded and unroaded National Forest lands. (Business, Spokane, WA - #A22047.65200)

**1044. Public Concern: The Forest Service should require logging companies to perform environmental impact studies.****TO PREVENT ENVIRONMENTAL DAMAGE**

Have logging companies perform environmental impact studies and require interventions like developers have. If they cause run-off make certain they build adequate traps to prevent stream damage. There is a logging company on the west coast, I believe Northern California, that is practicing environmentally sensitive logging. It can be done. (Individual, No Address - #A25892.65280)

*Funding***1045. Public Concern: The Forest Service should not charge a fee for dead timber gathering permits.**

How about not charging for permits for dead wood gathering? (Individual, No Address - #A5360.30200)

**1046. Public Concern: The Forest Service should not sell fiber.****CHIP THE BRUSH AND LEAVE IT ON THE FOREST**

Chip the brush and leave it there. No selling of fiber. (Individual, Redway, CA - #A7008.30540)

*Allow Timber Removal***1047. Public Concern: The Forest Service should permit timber removal in roadless areas.****BECAUSE IT WOULD REQUIRE MORE ACRES ELSEWHERE TO REPLACE THE TIMBER VOLUME**

In his 13 October 1999 announcement of this initiative, President Clinton noted, "Only five percent of our country's timber comes from the national forests. Less than five percent of the national forests' timber is now being cut in roadless areas. We can easily adjust our federal timber program to replace five percent of five percent, but we can never replace what we might destroy if we don't protect these 40 million acres."

There are at least three problems with this statement. First, timber production on 40 million acres of land that has been tied up in a litigation and studies for several decades, where, in fact, timber production has largely been prohibited pending decisions on the future of those lands, is simply not relevant to this debate. What is relevant is not that "five percent of five percent" of the Nation's timber supply has somehow managed to trickle off those lands but, rather, the fact (according to Forest Service data) that forty-six percent of the entire softwood growing stock timber inventory of the United States is on National Forest lands. It is also relevant that many acres of those lands are among the most productive timberlands on earth and it would require many more acres elsewhere to replace the timber that might have been harvested from them. *Even more important is that this replacement would have to be not only for the timber standing on those lands today, but also for all of the timber that might grow there in the future.* (Organization, Orono, ME - #A17644.65210)

**BECAUSE OF THE CENTRALITY OF WOOD PRODUCTS TO OUR CULTURE**

What about trees and wood? Wood products are something that are used in everyone's life, every day—the house you live in, paper, telephone poles, power poles, bridges, etc. The government couldn't operate without paper, nor could the banks or schools. If it hadn't been for wood to build the ships used to discover America, we probably wouldn't be here today. The wagon they used to pioneer the great country and the railroads that take the trains from coast to coast used wood. As you drive down the highway, look at the guardrails that keep you from plunging over a cliff or into a river and the fences that keep the livestock off the roads. I think that everyone just takes all these things for granted and doesn't realize how important wood is to everyone. How about all the jobs that the wood products industry create? For example, the child that starts school uses wooden pencils and paper they draw on. There are thousands of uses of wood if you open your eyes and look around. (Individual, Bonner, MT - #A958.65240)

**TO SUSTAIN TURKEY FARMS**

This also gives the turkey farmers a problem because the loggers will not be able to chop down wood or even get the dead and dried-out wood from the trees on the mountain to make the sawdust for the turkey farmers, and sawdust also makes nutri-mulch, one of the best fertilizers. (Individual, Chester, UT - #A22041.90510)

This issue also affects turkey farmers. Sanpete County is a county of turkey farming. All of the turkey farmers depend on the logging of our dead trees on our mountains for sawdust. (Individual, Moroni, UT - #A22043.90510)

**AS PART OF ECOLOGICAL RESTORATION EFFORTS**

If merchantable timber can be extracted as part of ecological restoration efforts, this should be allowed, but determination of what constitutes "ecological restoration" should not be at the discretion of USFS

silviculturists. It should be decided by ecologists from outside the agency. (Individual, Corvallis, OR - #A650.65220)

There are a few instances where chain saws might legitimately be used to move the vegetation towards ecological sustainability. When the USFS recognizes this situation, say so. A chainsaw is not needed on every acre. Nature seems to be doing pretty well . . . without our “help.” (Individual, Grangeville, ID - #A830.65260)

#### **AS LONG AS THE FOREST SERVICE REPLACES EACH HARVESTED TREE WITH FIVE PLANTED TREES**

I really do not have a problem with logging if the government replaces each tree with five more. If they do not wish to do this, then tough. (Individual, No Address - #A10440.90520)

#### **AS LONG AS IT IS NOT COMMERCIALIZED**

We must not allow timber harvesters to become commercialized—small loggers in Vermont are able to support their families without intruding into the Green Mt. National Forests. (Individual, Shelburne, VT - #A8102.90520)

### **1048. Public Concern: The Forest Service should permit timber removal by various methods.**

Please consider my viewpoints on the roadless issue to be against closing any more Forest Service roads. I also do not believe that logging is that detrimental to the forest if done properly and managed well. (Individual, No Address - #A724.90510)

Forests are a resource that should be utilized. It makes little sense to me to leave past areas off limits to efficient logging opportunists. (Individual, Phillips, WI - #A801.90510)

#### **WITH ROADS**

Timber in national forests should be recognized and treated as an important national asset. The Forest Service should return to a program of sustainable harvesting for the benefit of the whole (lumber-using) country and as one way to reduce wildfire hazards. Harvesting timber without building roads would be much more expensive and would reduce the ability to clear brush and slash as an economical part of harvesting contracts. (Individual, Twain Harte, CA - #A1043.90510)

#### **THROUGH A HARVESTING SYSTEM THAT DOES NOT REQUIRE ADDITIONAL ROADS**

Something that is desperately needed is a long reaching (miles) and economically feasible logging system that will permit removal of timber without additional roads. (Individual, Ellensburg, WA - #A17772.65220)

#### **THROUGH THE CONSTRUCTION OF TEMPORARY LOGGING RAILROADS**

All of the arguments regarding logging roads only list two alternatives—roads for trucks or not logging. There is a third way, used for many years by loggers but now mostly ignored: temporary logging RAILROADS!

For over a hundred years loggers in all parts of the U.S. and Canada used these, and a few even survive. In the steam era they even gave rise to a number of unique locomotive types, including three types of geared steam. Diesel locomotives were also found suitable.

Advantages of logging railroads:

- 1 Narrower right-of-way: 1 track vs. 2 lanes plus, pull offs.
- 2 Reduced grades: this requirement of steel wheels on steel rail often will require trestles yet these are easily constructed of material at hand—logs—and as they only need carry a single track they can be far cheaper than an equivalent truck trestle. This need for trestles often means point-to-point distances are greatly reduced from that needed for roads as track jumps across narrow valleys rather than winding down one side and up the other
3. Reduced dust clouds and erosion: both unavoidable where heavy trucks constantly tear up dirt roads.

4. Greatly reduced air pollution from hydrocarbons, meaning diesel exhaust. A single 1500 HP locomotive diesel easily does the work of 50 trucks of then times the horsepower and putting out 100 times as much exhaust. Also, the reduced grades of a railroad means power needs to move a given load are less, and locos do not have to pour out huge carbonous clouds as they claw up grades as trucks do as they climb out of valleys [that] railroads jump across.

5. Limited access: only rail equipment can use a railroad while any car, truck, bus, motorcycle, etc. can use a road.

6. Recoverable assets and reclamation: when a logging railroad is no longer needed, the rails and ties are picked up and reused. Little damage has been done to the land and vegetation quickly recovers.

7. Safety: a couple of radio-dispatched trains are far less likely to have accidents compared to dozens of trucks challenging each other at blind curves, narrow no-passing areas, etc. Also, [there is] far less danger of fire from a handful of diesel locomotives on a dedicated track to dozens of tracks which often run through dry brush, etc.

8. Tax saving: logging companies have always built their own railroads—no reason for taxpayers to foot the bill as they do for roads (see 5 above).

Conclusion: logging railroads are a sound compromise in that they allow logging yet with little of the damage and taxpayer cost of logging roads. Both sides will strongly oppose this idea, which means it is a good compromise, (if you cannot get both sides to agree to a compromise, find one both hate—just never favor one side over other—the first rule of an arbitration). (Individual, Burkeville, VA - #A23064.90412)

#### **BY HELICOPTER**

If economical, some limited helicopter logging could be done. (Individual, Missoula, MT - #A113.90516)

If and when necessary, non-clear-cut logging could be allowed using horse or helicopter. (Individual, Bozeman, MT - #A285.90523)

#### **BY HORSE**

You could consider logging if they wanted to bring it out by horse. (Individual, No Address - #A781.90520)

#### **BY ELEPHANT**

I favor new technologies or old technologies that work. In Indonesia they use elephants because they're easy on the fragile soil and because they can selectively cut trees and easily get them out of the cut area—that's the kind of logging I agree with. (Individual, Palmer Lake, CO - #A23361.90510)

#### **HARVEST SAW LOGS AND SMALL TREES**

The USFS should focus on caring for the Roaded areas - harvesting some saw logs and many more small trees. That is what we do on the 2,800 Double Arrow Ranch with 370 homes. (Individual, Seeley Lake, MT - #A5799.30100)

#### **HARVEST SMALL-DIAMETER TIMBER FROM ROADED AREAS**

The Forest Service must advance small diameter timber utilization from roaded areas. (Individual, Cleveland, OH - #A26411.65220)

#### **SELECTIVE TIMBER REMOVAL**

Woodlots/woodlands have to be managed: Good management practices require that you have roads into the woodlands. For example in our part of the country (NH) hemlock trees often develop rotten heartwood when they get up to 15+ inches in diameter. It's foolish to just let them stand there and rot till they fall. There are many trees that just need to be harvested and thinned out so that better quality timber can grow. Access needs to be available so that collections of underbrush and downed limbs etc. can be chipped or removed for fire protection. You need roads for these chores. (Individual, Keene, NH - #A3648.65200)

Keeping in mind that during the 1940s, the private timber companies opposed the cutting of timber on public lands, I think that these policies should be revived.

Timber cutting should be done only for the following:

- a) To thin trees to reduce wild fire danger
- b) Christmas trees
- c) Firewood for public use.
- d) When trees are so old that they are about to die, then it's OK to cut some of them that are deemed surplus for wildlife use (e.g. termites/birds, etc). (Individual, Olympia, WA - #A441.65200)

#### **SALVAGE TIMBER REMOVAL**

I support a policy that allows those same emergency fire roads to be used for a limited time only (perhaps a limit of two years past the fire season) as avenues for salvage logging. There's no point in wasting timber that has already burnt. As the situation in Yellowstone today shows, burnt trees that have dried and toppled only turn to matchsticks, increasing fire danger with no significant improvement to forest health in a dry climate (no humus formed for hundreds of years!). I support limited and selective logging of burned areas - no clear cutting, always using best practices, and all other current regulations should be followed without exception. (Individual, West Yellowstone, MT - #A1045.31120)

In those cases where such devastation does occur, consideration should be given to the appropriate recovery of damaged timber resources for both the utilization of such timber for the building needs of our nation and to prevent the spread of disease and destruction of healthy stands of timber. (Organization, Washington, DC - #A5069.31120)

### **1049. Public Concern: The Forest Service should permit timber removal in certain areas.**

#### **IN WISCONSIN**

I am opposed to any policy that would restrict the construction of roads and the use of motorized vehicles in National Forest land, thereby ending timber production on these lands. Any such policy would have a negative effect on our economy and residents of Wisconsin who we represent. (Elected Official, State of Wisconsin - #A30167.90100)

#### **IN SIERRA COUNTY**

Timber harvests (fuel wood gathering and timber operations) have been a vital part of Sierra County's customs and cultures and economy. The impact of the Roadless Area Initiative has yet to be determined, but its impact on future fuel wood gathering and any timber production could be significant. This is because it could lock up almost all of the forests, resulting in less than 20% left for multiple use and future timber production in Sierra County. (Manager, Sierra County, NM - #A22059.65230)

#### **IN ROADED AREAS OF THE TONGASS NATIONAL FOREST**

Another major issue examined during the TLMP revision process was the issue of falldown, or the failure of remotely sensed data to adequately portray timber and landscape condition. The reality is that the Tongass does not have the extensive timber resources it was once thought to have. The forest wide average timber per acre is not 25 mbf/acre. Harvest between 1955 and 1990 averaged about 41 mbf/acre (USDA Forest Service, 1991). This high-grading makes it very difficult now to plan large timber sales that are economical. Removal of remaining old growth stands has serious implications for species viability. The Forest Service should now turn its attention to sustainable harvesting from roaded areas for locally owned small operators (Individual, Sitka, AK - #A15506.45623)

The logging industry was not kind to its workers or the environment. It saddens and frustrates me that our congressmen continue to scream loudly for jobs in the timber industry when the industry left its employees high and dry before the 50-year contracts ever ended. The two mills' bad treatment of their

workers is well documented. The industry couldn't compete with lower priced Canadian wood for pulp but the misinformation about why the mills were going down the tubes continues to abound.

It also seems that people have forgotten that Alaska Pulp and Ketchikan Pulp Co. had illegally divided up the forest between themselves, violated antitrust laws, forced small companies out of business, and perpetrated some of the worst logging practices in the history of logging. However, if the industry wants to continue to pursue clear-cut logging in the Tongass forest it still can. The Forest Service needs to hold the industry to logging in the areas where roads already exist and not allow them into pristine wilderness where the recreation, fish, and wildlife values are so important. (Individual, Juneau, AK - #A10588.45623)

I am particularly concerned that the Tongass roadless area receive full protection for their identified roadless areas.

I have lived in the Tongass for three decades and value the wildlands, wilderness, and the natural living resources of the area. I include old growth and uneven-aged forests among the living resources as well as the wildlife, fish, and understory plants. Chief Bosworth, if you lived here or visited our wild areas, you would recognize that the ecosystem is still intact, thanks to the cessation of industrial-scale logging when the two pulp mills closed.

The greatest good in the long-range scheme of life is to leave this magnificent forest. We can not improve upon it by building roads and cutting trees. There is ample inventory of timber adjacent to the existing roads to support reasonable harvesting far into the future, without entering the unroaded areas.

My family and I use the Tongass for subsistence activities, recreation and rejuvenation. We use a boat or kayaks to reach many places within the Sitka area. We share the areas with friends and visitors; none of them say they think the forest should be clearcut to satisfy a political agenda. (Individual, Sitka, AK - #A17360.45623)

#### **IN THE ROGUE RIVER/SISKIYOU NATIONAL FOREST**

The Rogue River/Siskiyou National Forest covers some 1.750 million acres. For comparison, the State of Oregon manages some 18,073 acres in southwest Oregon. In 1999, the state sold 6.1 mmbf under sustainable forestry practices. The 466 employees of the Rogue River/Siskiyou National Forest, with an annual payroll of approximately \$38.45 million, are either incompetent or the NWFP is broken! The Clinton Administration Northwest Forest Plan (NWFP) **promised** an annual allowable harvest on the Rogue River/Siskiyou National Forest of 50 million board feet (mmbf). In Fiscal Year (FY) 2000, the total harvest on the Rogue River/Siskiyou National Forest was **less than one 1 million board feet**. (Association, Medford, OR - #A17183.65263)

#### **ON PRIVATE LANDS**

Out west I have seen huge areas of clear cut. The "seed trees" left on a national forest in which I camped in S. Wyoming were sitting there useless. No seedlings in sight and the cut over was old.

Silviculture can and should be done by private property owners. Our national forests and BLM lands need to be preserved and restored for native habitat and clean water. (Individual, Bradenton, FL - #A12811.30700)

We have millions of acres of forests in this country, and the only significant resources that can be extracted from them are wood and wood pulp. These materials can be produced at very competitive cost from private forests where the trees are replanted, in other words, sustainably. (Individual, Northridge, CA - #A12738.65240)

#### **ONLY IN AREAS THAT ARE ALREADY ACCESSIBLE BY EXISTING ROADS**

I understand this is a tough decision for the FS to make since the mandate of the FS is to manage its lands for many uses including timber harvest. However, I believe the FS should focus on managing timber stands for harvest only on NF lands that are already accessible by existing roads. Why destroy a pristine ecosystem for timber that will only build a handful of houses and take a century to recover? (Individual, Washington, DC - #A5223.75510)

We need to continue logging, but I encourage you to support further logging and road building in areas already “defiled.” (Individual, Salem, OR - #A452.65200)

**1050. Public Concern: The Forest Service should consider a categorical exclusion for some routine activities.**

**SUCH AS TIMBER REMOVAL**

I think the Forest Service is spending too much of it’s limited manpower and budget on what I consider frivolous appeals and lawsuits that really have very little merit. For example, almost all of the eastern United States has been clear-cut or high-graded numerous times with no permanent damage as can be seen by the fact that we now have numerous wilderness areas in these same cutover areas. Why doesn’t the Forest Service use that fact alone as basis for proposing that more routine activities that have been occurring for years be categorically excluded from a NEPA decision? (Individual, Russellville, AR - #A3484.45500)

**1051. Public Concern: The Forest Service should implement existing forest plans.**

**TO MEET HARVEST LEVELS ADOPTED DURING THE FOREST PLANNING PROCESS**

Notwithstanding the current programmed sale levels are significantly lower than the harvest levels adopted during the LRMP process, the Forest Service is not able to meet these lowered programmed sale levels even with increased funding and staffing. It is our position that the public would be better served and the Forest Service’s time and money better spent if it shifted its attention to implementing the existing forest plans and removing the institutional impediments that preclude effective implementation. (Elected Official, Roseburg, OR - #A11811.65263)

**1052. Public Concern: The Forest Service should support a sustainable timber industry.**

**BY SUPPORTING SUSTAINABLE TIMBER REMOVAL PRACTICES**

If the industry learned to operate by cutting less than what it grows, cutting lower quality trees leaving established “legacy” trees to continue their population and to support other life dependent upon them, cutting in harvest cycles of several decades taking only 1/3 of the trees of designated allotments, and maintaining trees of all sizes and ages within each allotment, maybe we could see a sustainable timber industry. This industry would not be dependent upon new roads in areas of the forest which are now currently in natural states, but would be able to operate on private land and within existing timber allotments. This practice could also allow a healthy forest to consistently exist within the allotment. As it stands now, when timber interests harvest trees they leave the landscape barren and nearly useless after a few harvests. (Individual, Carbondale, CO - #A17312.65220)

**BY MANAGING SECOND GROWTH IN THE TONGASS NATIONAL FOREST**

Manage second growth for a sustainable future timber industry: Forest Service timber management efforts should focus on the vast tracts of second growth now available on the Tongass. With 70% of the healthiest old growth stands now harvested, it is time to look at what is happening in those clear cuts. The future of the Tongass timber industry lies in the effective management of second growth stands- NOT in the continued assault on old growth. Pre-commercial and commercial thinning efforts need to be stepped up a hundred-fold in the Tongass. The careful grooming of our second growth will ensure a sustainable timber economy over the long haul. Anything else is short sighted and a recipe for environmental as well as economic disaster for the region. (Individual, Tenakee Springs, AK - #A1758.65280)

**BY REMOVING RESTRICTIONS AND LIMITATIONS**

It has been harped upon for decades that federal timber sales in Montana are money-losing propositions. This is because of the hoops that companies must jump through to obtain permission for their operations. A federal timber sale could exist alongside a state or private logging operation, with the same quality of

trees, and lose money while the state or private unit would be profitable, all because of excessive restriction and limitations lobbied for by environmentalists. (Individual, East Helena, MT - #A20422.15121)

**1053. Public Concern: The Forest Service should allow timber removal on other forest lands to replace lost timber volumes due to roadless designations.**

Any roadless review program should examine revising the timber harvest levels to meet the multiple use objectives. With the disparity between growth and harvest, the opportunities to harvest are graphically illustrated in the DEIS (page 3-112) wherein it noted that net annual growth on the NFS in 1997 was 20.5 billion board feet. This growth and yield indicates that there are options to reduce development pressure on the roadless areas by increasing the harvest levels on the remaining lands or to spread the impacts across a large land base. (Elected Official, Roseburg, OR - #A11811.65263)

**IN OREGON**

The analysis assumes that timber harvest reductions resulting from the prohibition proposed would not be replaced with timber volume from other NFS lands (DEIS 3-11), however since the same attributes and amenities that are allegedly benefited by the proposed action are also found in land management prescriptions already in place on other NFS lands, we recommend reexamining these other land allocations and prescriptions to determine if they can be eliminated or otherwise modified to replace the lost timber volumes. This is particularly relevant on the Oregon forests where the majority of NFS lands are now managed for biodiversity, endangered species, recreation, and other non-timber values. (Elected Official, Roseburg, OR - #A11811.65263)

**1054. Public Concern: The Forest Service should not place restrictions on timber removal on privately owned forest lands adjacent to state and national forests.**

**BECAUSE THE FOREST SERVICE'S REFUSAL TO THIN NATIONAL FOREST SYSTEM LANDS WILL RESULT IN MORE WILDFIRES**

Privately owned forestlands adjacent to State and National Forests should not have restrictions that prevent timber harvest. Wildfires will continue to burn the forest as USDA Forest Service refuses to thin National Forest or allow commercial logging and road building in 49.2 million acres of roadless national forest, with limited exceptions for public safety and national security. (Individual, Jefferson, OR - #A775.30700)

**1055. Public Concern: The Forest Service should enlist the public to help clear and thin the forests.**

**AS IT PROMOTES COMMUNITY AND CULTURAL INVOLVEMENT**

I believe public participation into helping with the clearing and thinning should be the ultimate tool as it always has been around here. It promotes community and the culture that existed until recently that is strong and involved in the forest as a cultural reality. (Individual, No Address - #A5360.30100)

**1056. Public Concern: The Forest Service should allow wood gathering in roadless areas.**

Forest gathering is fun. (I have often gone into the forest for wood and collected pinion, gone fishing and had a picnic.) Being in the forest is calming. Gathering is good exercise. Gathering allows you to do something important while you are scouting for the hunt or just visiting. (Individual, No Address - #A5360.65290)

## *Do Not Allow/Restrict Timber Removal*

### **1057. Public Concern: The Forest Service should prohibit timber removal in roadless areas.**

The following activity should be expressly prohibited in the roadless areas: Logging by any means. Mechanical thinning is not to be included in this restriction, but any tree cut must remain on site, soil shall not be compacted by vehicles, and distribution of remaining trees shall follow patterns natural to the area. (Individual, Dallas, OR - #A3697.90100)

#### **DURING THE ANPR COMMENT PERIOD**

SWAN opposes the initiation and implementation of logging projects within roadless areas during this time of comment. This is unconscionable. More than a million people commented and raised their collective voice that these areas should be protected. Now, the President has unilaterally changed the policy giving the National Forests to scurry into roadless areas out west during this period of “administrative limbo.” While SWAN does not work in Alaska and California, we, as American citizens, are harmed as well. (Organization, Plymouth, MN - #A7116.15112)

### **1058. Public Concern: The Forest Service should prohibit all timber removal methods.**

#### **HELICOPTER LOGGING**

The alternative use of helicopters is not that desirable because of the dangers a crash can cause to the forest especially fire. (Individual, No Address - #A31.90526)

Next thing I hear is that some companies plan to bypass the regulations by using helicopters to bring in their equipment and labor force—and to haul their “products” out. What kind of a game is this? (Individual, Monrovia, CA - #A190.90526)

#### **SALVAGE LOGGING**

We urge the agency to approve a plan that: Prohibits not just “commercial logging” but also any other removal of living or dead trees from roadless areas. (Organization, Missoula, MT - #A17234.90520)

#### **CLEAR CUTTING**

Logging should be limited to traditional non-mechanized clearing and single tree extraction. Clear cutting should be banned throughout the entire national forest system. (Individual, Winchester, VA - #A378.90520)

I support prohibition of large-scale clear-cut logging and large-scale mining. Decisions on small logging and mining operations, as well as off-road vehicle use, should be made on a forest-by-forest basis, after a planning process that involves a nationwide public comment opportunity. (Individual, Sitka, AK - #A698.90520)

Clear cutting takes away the cones/re-growth and causes all kinds of damage that loggers don't pay for or clean up after. (Take a look at clear-cut areas with no re-growth—have loggers take care of the land, as a farmer/rancher takes care of his). (Individual, Bozeman, MT - #A665.90523)

Clear cuts should be ended as a primitive form of management with gross ecosystem impacts. (Individual, Boise, ID - #A64.90523)

**1059. Public Concern: The Forest Service should prohibit timber removal in certain areas.**

**IN WASHINGTON STATE**

We live in Washington State, at the foot of Mt. Rainer, on the northwest corner of the National Park. Surrounding the mountain inside of the Park is a VIRGIN, TEMPERATE, INLAND RAINFOREST, with well over 200 inches of annual rainfall. We live on our own privately owned lands in the middle of timber company holdings, just a few miles from the entrance to the park. There are about 50 people that live in our unincorporated area of Fairfax. We see the atrocities that are inflicted on the forests during clear-cutting and spraying of poisons. We are first-hand witnesses to this destruction, because we see it everyday. Our VIRGIN TEMPERATE, INLAND RAINFOREST in the park is being affected by industry logging RIGHT UP TO ITS BORDER in three separate sections on the north side. We barely have one mile of Forest Service lands as a buffer for the park in many places. Clear-cutting was drastically escalated before the Salmon Plan kicked in. They logged all of our seven-mile INLAND, TEMPERATE, RAINFOREST valley in just a few short years. (We have only a few sections that are public-owned 'islands' of land in our valley, and the oldest tree farm is just 28 years old.) This hurt our local loggers, because that much area could have provided work for a decade for just locals, but they called in crews from all around to log faster. They are logging huge areas of 20-30 year-old trees for chip-wood that could be made from many other types of wood. This is ridiculous! They have also built about 2-3 miles of new road on every square mile up here while they could, before the salmon sanctions started. Hundreds of permits went out before the plan kicked in. (Organization, South Prairie, WA - #A28978.65200)

**IN AREAS CONTAINING LESS THAN 50 PERCENT SUITABLE TIMBER BASE**

No IRA should be allocated to developmental uses if the land has only "poor" timber site or productivity, even if it's currently stocked with mature timber. Only "fair to good" site or productivity should be considered for allocation to developmental uses in an IRA. Timber sites with "poor" productivity will be too costly to manage for timber and the "wildness" tradeoff will be too high.

An IRA should not be considered for development unless it contains at least 50% or more suitable timber land. If it contains less than 50%, it will probably be uneconomical and the "wildness" tradeoff will be too high. An IRA land area should also have at least 50% or higher productive soils to be considered for development. Less than 50% will be too costly to manage for development. (Individual, Libby, MT - #A2301.65260)

**IN THE SKYKIOMISH WILD COUNTRY**

I would especially oppose any logging in the Skykiomish Wild Country near INDEX. (Individual, Seattle, WA - #A41071.90520)

**1060. Public Concern: The Forest Service should prohibit timber companies from harvesting virgin timber on National Forest System lands.**

Large timber companies that want big virgin wood should learn to grow it on their own property. (Individual, Amasa, MI - #A793.45626)

**1061. Public Concern: The Forest Service should stop preparing timber sales in the Tongass National Forest.**

**WHICH ARE IN VIOLATION OF THE ROADLESS AREA CONSERVATION RULE**

The Roadless Area Conservation Rule should be retained and implemented as is. The Bush administration needs to do all that it can to ensure protection of America's remaining roadless areas. In particular, the Forest Service should stop preparing timber sales in the Tongass National Forest that are in violation of the Roadless Area Conservation Rule. (Individual, Napa, CA - #A1037.10150)

**ON PRINCE OF WALES AND GRAVINA ISLANDS**

The Forest Service should stop timber sales in the Tongass National Forest that violate the Roadless Area Rule. Some sales proposed for wild places like Prince of Wales Island's last roadless areas, and Gravina Island, should be the first to be called off. (Individual, San Francisco, CA - #A17368.12440)

**1062. Public Concern: The Forest Service should adjust the annual sale quantity downward.****TO PREVENT FURTHER BIOLOGICAL AND RECREATIONAL PROBLEMS IN ROADED AREAS**

The Forest Service typically employs timber targets for National Forests. As roadless lands in the Forest Service timber base are conserved under a roadless area protection policy, the roadless lands will be removed from the timber base. This will impact the timber sale program of the National Forests.

Siskiyou Project recommends that the annual sale quantity be adjusted to a lower harvest amount. The only other alternative is to shift this timber burden to the roaded portions of the National Forest System. This approach is not sustainable. The roaded portions of our National Forests require restoration and recovery from damaging activities. To expect more harvest from this land based on a "rob Peter to pay Paul" approach that will further compound biological and recreational problems on the roaded parts of the National Forest system. (Organization, Cave Junction, OR - #A17235.65230)

**TO REFLECT THE INTERESTS OF SPECIAL INTEREST GROUPS AND SMALL SCALE GATHERERS**

The old way did not work, in many ways; the rape and management of the forests has been poor in many ways. First, before and after the turn of the century (late 1800s and early 1900s was a period of wanton rape all over the country). Then there was a period of heavy use, then a period where roadless areas were designated as a reaction to the incredible big scale logging and rape of the forest. Then the miserable policy of the "Smokey the Bear" system devastated the natural ability of the forest to take care of itself. Then the poorly directed environmentalists continue the dysfunction by insisting that we do nothing to the forests. All the while we ignore the culturally and historically valid systems that have validity of carefully tending the forest by using and protecting this treasure. The loggers have some place here and I would rather have the forest logged than burned up. The methods of logging have to be seriously looked at and scaled down to reflect the interest of the enviros and the needs of the smaller scale gatherers. (Individual, No Address - #A5360.30100)

**1063. Public Concern: The Forest Service should prohibit wood gathering in roadless areas.****UNLESS THE AREA IS A BUFFER ZONE**

In order for the process to reach its full environmental and scientific potential human activities within those designated areas should be kept to an absolute minimum.

The following activity shall be expressly prohibited: Collecting firewood, with the exemption of those areas considered buffer zones for the protection of human settlements. (Individual, No Address - #A26840.90000)

**Mining, Oil, and Gas Development****Summary**

**General Comments** – Most general comments regarding mining, oil, and gas development deal with mining leases and management related to mineral exploration in general. One Organization is concerned mineral rights are not "held hostage" within roadless areas and believes the exception for existing leases in the current Roadless Rule is a fair and reasonable and goes on to recommend that the Forest Service revise management of mining leases in inventoried roadless areas such as to discourage further mineral exploration. Another suggests the Agency should hold companies responsible for environmental damage.

Others assert that the Forest Service should not implement the Roadless Area Conservation Rule because it will make mineral exploration less feasible because of increased permitting costs and mitigations measures. This respondent goes on to cite numerous legal and statutory references to assert that, in fact, the surface Mining Control and Reclamation Act of 1977 obviates the need to apply the Rule to mining; hence the Forest Service should exclude mining lease renewal and modification from application of the Rule.

One elected official advises the Forest Service to address short-term safety issues regarding mining activities while the Rule is undergoing review. “While the Roadless Area Rule has been enjoined,” writes this respondent, “the effects of the roadless boundary are being felt on the daily operations of the mines. For example, two of the mines are now drilling methane ventilation holes from the surface in order to protect worker safety. However, even though they hold existing coal leases, the roadless area issue is slowing down the approval of the drilling program. It is critical that the Forest Service address these short-term safety impacts that can’t wait to be resolved until a revision of the Forest Management Plan is completed.”

**Adequacy of Analysis** – A number of respondents offer suggestions regarding the analysis of mining impacts. To begin with, some suggest the Forest Service should analyze oil and gas resource potential in roadless areas, specifically through a public lands inventory of hydrocarbon potential. According to some, the Agency should assess the amount of oil reserves that lie under National Forest System lands, while others say it should assess the percentage of coal that comes from these lands. On a similar note, some recommend the Agency assess the impact of the Roadless Area Conservation Rule on energy potential.

One county commissioner calls on the Forest Service to provide a legal review to determine whether the Rule can prohibit access to mining claims. Others suggest the Agency obtain input from the Bureau of Land Management regarding leasing areas included in the roadless inventory. One association asks the Agency specifically to justify its claim that inventoried roadless areas would be among the last areas entered for exploration and development. They do not believe this is clear in the final rule and distrust the Agency’s motives.

Organizations comment in particular about monitoring of mining activities. According to one, the Forest Service should improve post-plan monitoring of oil and gas developments; this should include, this respondent goes on, development of an inventory of resource data. This same organization encourages the Agency to prepare a reasonably foreseeable development scenario for analysis of effects of oil and gas development, one which analyzes the net effect of long-term surface disturbance rather than the number of wells to be drilled.

**Mining, Oil, and Gas Development** –The most common remark made on this topic is that the Forest Service should ensure access for mining—as required by law (see also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Mining Laws General, Mining Law of 1872, and Mining and Mineral Policy Act*) and by the Forest Service Manual and regulations. Others assert that the Forest Service should specifically allow mineral, oil, and gas exploration and extraction in roadless areas—to help lower the costs of fuel in the United States and to help maintain the supply of hardrock minerals critical for defense technologies. One individual adds, however, that continued exploration and extraction should only be allowed if companies agree to clean up existing super-fund sites. Likewise, some say it should only be allowed by certain methods, such as slant drilling or other techniques which do not disturb the surface, or by manual means.

A number of respondents suggest specific states or areas in which mining exploration and extraction, they say, should be allowed to continue, as well as certain mining operations they say should continue. Additionally, a few respondents ask the Forest Service to clarify that mining leases issued by the Bureau of Land Management will not be affected by the Roadless Area Conservation Rule. Finally, one utility group asks the Forest Service to exempt geothermal leases from the Rule, including new geothermal resource areas identified by the Bureau of Land Management.

Although those who state that mining exploration and extraction should be allowed to continue typically write more detailed responses on behalf of their position, others assert that mineral exploration and extraction should be restricted. In particular, a number of individuals and Organizations state that it should be prohibited altogether in roadless areas. People also identify certain mining methods they say should not be allowed, including acid mine draining, gold mining techniques, and recreational mining. Additionally, respondents identify specific states and areas where they say mineral exploration should be prohibited. One individual asks the Forest Service to revoke inactive mining claims. Finally, although the issue of drilling in the Alaska National Arctic Wildlife Refuge does not arise in the Advance Notice of Proposed Rulemaking, several respondents urge the Forest Service to oppose it.

### *Mining, Oil, and Gas Development General*

#### **1064. Public Concern: The Forest Service should revise management of mining leases in inventoried roadless areas.**

As a general matter, roadless areas must not be “held hostage” to mineral rights within their borders. The exception for existing leases in the current Roadless Rule is a fair and reasonable compromise. Further, we recognize certain limitations in addressing private mineral rights on national forests, but recommend that, at a minimum, 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. 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. Finally, 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. (Organization, Charlottesville, VA - #A25689.65340)

#### **1065. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.**

##### **BECAUSE IT WILL MAKE MINERAL EXPLORATION LESS FEASIBLE**

Just as the clear leasing exception of [section] 294.12(b)(7) has been muddled by the FEIS, however, here too in the case of locatable hard rock minerals (such as gold, silver, platinum, and palladium), the access protections for mining claimants are inadequate. Exploration for and development of locatable minerals will still face significant adverse impacts under the *application* of the Roadless Rule due to increases in permitting costs and mitigation measures. In other words, road construction in inventoried roadless areas, even if allowed, will be subjected to more stringent regulatory requirements by the mere fact of location within a roadless conservation area, notwithstanding that the areas are open to multiple use, including mineral entry, as specified by Congress. For example, the FEIS explained: For both locatable and leasable minerals, there may also be impacts associated with potential increases in the costs of permitting and environmental mitigation of activities within inventoried roadless areas. This could affect future exploration and development for leasable and locatable minerals. Most proposed activities, particularly if they are proposed within inventoried roadless areas, are already subject to intense scrutiny through preparation of environmental impact statements. However, it is possible that in

some cases, the requirements for environmental analysis may increase, mitigation requirements may increase, and the processing times may increase. Over the long term higher costs and longer processing times might cause some portion of the mineral resources in inventoried roadless areas to become uneconomic. If that occurred, the level of development would be reduced . . . .

FEIS, Vol. 1 at 3-316 - 3-317. See also FEIS, Vol. 1 at 3-321 (“Exploration and development of locatable minerals could be affected if costs are increased because of additional environmental mitigation and/or delays.” (discussing social effects of the preferred alternative).

Indeed, all indications point to heightened environmental regulatory standards in roadless areas. Thus, under its “Roads Policy” (published in the Federal Register on the same day as the Roadless Rule), the Forest Service provides that a full-blown environmental impact statement will be required for any road construction or reconstruction in roadless areas.

There is no such *per se* rule in the current system, nor is there a need for one. Such decisions have been made on a case-by-case basis and a less onerous “environmental assessment” is often sufficient.

This is particularly the case with regard to hard rock minerals, because (like the mining of leasable minerals) mining of locatable minerals on National Forest lands is subjected to detailed environmental protection requirements contained in the Forest Service’s own regulations at 36 C.F.R. Part 228, Subpart A. These rules contain specific requirements for the construction, maintenance, and reclamation of roads. And, of course, mining of locatable minerals on Forest Service lands is also subject to all federal environmental protection statutes. (Association, Washington, DC - #A19636.65320)

#### BECAUSE IT WILL MAKE MINERAL EXPLORATION IMPOSSIBLE

Although mineral location technically can continue in these areas, the very classification makes it almost impossible to explore and develop a mine. (Individual, Elko, NV - #A13510.75530)

### 1066. Public Concern: The Forest Service should recognize that the Surface Mining Control and Reclamation Act of 1977 obviates the need to apply the Roadless Area Conservation Rule to coal mining.

Not only do SMCRA’s stringent mining and reclamation statutory provisions and implementing regulations obviate the need for applying the Roadless Rule to coal mining on National Forest lands, but also SMCRA *precludes* the application of the Rule to such coal mining. Here, we reference the Federal lands program mandated by SMCRA [section] 523 (30 U.S.C. [section] 1273), and especially SMCRA’s statutory provisions for designating areas unsuitable for coal mining. *Id.* [section] 522, 30 U.S.C. [section] 1272. This long-standing all-encompassing program, discussed more fully below, constitutes the *exclusive* statutory scheme for “roadless” designations of coal mining on National Forest lands. Indeed, the Federal lands program mandated by section 523 of SMCRA and especially SMCRA’s section 522 statutory provisions for designating areas unsuitable for coal mining should have weighed heavily in the cumulative impacts assessment contained in the Roadless Rule FEIS. However, it was ignored.

The term “Federal lands” includes National Forest lands. SMCRA [section] 701(4), 30 U.S.C. [section] 1291 (4). The term “surface coal mining and reclamation operations” includes surface impacts incident to both surface and underground coal mining. SMCRA [section] 701(28), 30 U.S.C. [section] 1291(28). And it is the Secretary of the Interior who awards leases of coal on federal lands (with the consent of the Secretary of Agriculture for coal underlying the surface of National Forest lands). 30 U.S.C. [section] 201(a). See also 43 C.F.R. [sections] 3400.3-1 and 3400.3-3.

Further, SMCRA [section] 522 establishes procedures and requirements for designating areas unsuitable for surface coal mining. 30 U.S.C. [section] 1272. All federal lands, including National Forest lands, are covered by this statutory scheme.

Thus, under SMCRA, Congress established, with some exceptions, a *per se* category of unsuitability for coal mining on National Forest lands.

This act cannot supersede the clear, subsequent pronouncement of congressional intent articulated in [SMCRA] [section] 552...” *Texaco, Inc. et al. v. Andrus*, No. 79-2488 (D.D.C., Aug. 15, 1980), appeal dismissed (D.C. Cir. Oct. 21, 1982). This statement applies just as equally to all of the statutory authorities cited by the Forest Service in support of the Roadless Rule; and, therefore, SMCRA

constitutes the *exclusive* statutory scheme for “roadless” designations of coal mining operations on Forest Service lands. To implement SMCRA [section] 523, OSM has promulgated regulations in Subchapter D of Chapter VII, Title 30 C.F.R.; and to implement SMCRA [section] 522, OSM has promulgated regulations in Subchapter F of the same Chapter VII. These regulations include and incorporate provisions for designating areas unsuitable for surface coal mining. It is in the Interior Department, Bureau of Land Management’s (“BLM”) coal management regulations, however, that the Federal lands review required by SMCRA [section] 522(b) and the *per se* unsuitability category for coal mining in the National Forests mandated by SMCRA [section] 522(e) are addressed and implemented. See 43 C.F.R. Subpart 3461 - “Federal Lands Review; Unsuitability for Mining.” Briefly stated, here is how this regulatory scheme works.

The Federal lands review is carried out “principally through lands use assessments by the surface management agency.” 43 C.F.R. [section] 3461.0-6. This, of course, would mean the Forest Service on National Forest lands. During the course of such land use assessments, the surface management agency (i.e., the Forest Service on National Forest lands) would be required to apply each of 20 unsuitability criteria specified in 43 C.F.R. [section] 3461.5, the first of which is based on SMCRA [section] 522(e) and provides for blanket unsuitability of all National Forest lands. (Association, Washington, DC - #A19636.65310)

### **1067. Public Concern: The Forest Service should exclude mining lease renewal and modification from application of a roadless designation.**

The preamble . . . specifically stated that “Existing coal leases are not subject to the prohibitions.” It would appear, however, that even in the case of what sounds like a clear, unambiguous directive for existing coal leases, the devil is in the details. Thus, the FEIS stated in its description of the Rule:

When existing leases expire, any *renewal* would have to be considered in light of the prohibition... In addition, this would apply to any *modification* of existing leases. Prohibition of road construction or reconstruction in inventoried roadless areas may influence reanalysis of lands available for lease when land management plans are revised or amended.

FEIS, Vol 1 at 3-259. This FEIS explanation of how the subsection (b)(7) exception would be applied presents real problems because: (1) existing mine plans rely on future reserves, and if such reserves are not available are routinely *renewed* for 10 year terms after an initial lease term of 20 years as long as there is production from the lease (see 30 U.S.C. [section] 207); and (2) furthermore, *modifications* of existing leases commonly occur in order to make “logical mining units” to increase efficiency, to avoid bypass of federal coal reserves, and for other reasons.

Application of the subsection (b)(7) exception in the manner described by the FEIS would be unworkable. In order for a federal coal lease to be issued, a mineable reserve will have had to be proven through an exploration (usually through drilling) process regulated pursuant to strict state and federal regulation. See, e.g., the Bureau of Land Management’s Coal Management Rules at 43 C.F.R. Group 3400. It is simply unreasonable that such a process (often involving a two-or-three-decade time frame) should arbitrarily be derailed by a roadless designation pursuant to the Roadless Rule. This problem must be resolved in any new rulemaking.

This problem must be resolved in any new rulemaking. If the Forest Service insists on including mining within the ambit of a new rule, then as long as federal coal lessees are in full compliance with the terms of the lease, any subsequent renewal or modification should be excluded from application of a roadless designation.

The Companies are concerned that what appeared clear has now become quite opaque. Coal production from *existing* leases may well be in jeopardy. Furthermore, and importantly, because the Forest Service determined that “baseline information for existing leases is not necessary” its estimates of impacts of the Roadless Rule are tainted. (Association, Washington, DC - #A19636.65310)

**1068. Public Concern: The Forest Service should recognize that oil and gas leasing is not a project-level decision requiring additional National Environmental Policy Act analysis.**

We object to the view that oil and gas leasing is a project-level decision requiring additional NEPA analysis. Although we recognize a lease conveys specific rights subject to terms and conditions of the lease, it must be duly noted that decisions regarding lease terms and conditions are predicated upon the analysis performed in conjunction with the land and resource management plan and decisions regarding land use allocations. As such these decisions are relatively broad in nature, while proposals to drill are project related and site-specific. For example, a separate NEPA decision is required to approve a project proposal on a lease, such as a well, while the leasing decision can be made more broadly through the planning process. This leasing procedure was upheld in *Wyoming Outdoor Council v. USDA Forest Service*. (Business, Denver, CO - #A25688.65310)

**1069. Public Concern: The Forest Service should address short-term safety issues regarding mining activities.**

**UNTIL THE ROADLESS AREA CONSERVATION RULE IS FINALIZED**

The one concern is that the Forest Management Planning process takes a significant amount of time. While the Roadless Area Rule has been enjoined, the effects of the roadless boundary are being felt on the daily operations of the mines. For example, two of the mines are now drilling methane ventilation holes from the surface in order to protect worker safety. However, even though they hold existing coal leases, the roadless area issue is slowing down the approval of the drilling program. It is critical that the Forest Service address these short-term safety impacts that can't wait to be resolved until a revision of the Forest Management Plan is completed. (Elected Official, Delta, CO - #A15550.90711)

**1070. Public Concern: The Forest Service should not subject existing mining leases to communalization agreements.**

Existing leases within roadless areas should not be subject to communalization agreements unless all leases covered by the agreement are located entirely within the roadless area. (Organization, Charlottesville, VA - #A15659.90720)

**1071. Public Concern: The Forest Service should hold companies responsible for environmental damage from oil and gas development.**

I believe oil and gas companies should be held accountable and legally responsible for RCRA, NEPA, and CERCLA violations. (Individual, Longmont, CO - #A7449.75600)

**1072. Public Concern: The Forest Service should recognize the efforts of the mining industry to preserve the environment and beauty of the grasslands.**

The oil and gas industry in North Dakota has operated on the grasslands for nearly 50 years. Our industry and the FS are proud of the ability to develop those lands while preserving the environment and the beauty of the grasslands. The Roadless Initiative gives no consideration to that history. (Business, Bismarck, ND - #A19269.65330)

*Adequacy of Analysis*

**1073. Public Concern: The Forest Service should improve post-plan monitoring of oil and gas developments.**

**INCLUDE DEVELOPMENT OF AN INVENTORY OF RESOURCE DATA**

PLA supports improved post-plan monitoring by the FS. Current monitoring activities have been ineffective and have not been used to determine the effectiveness of planning decisions. While we fully support improved monitoring requirements, we strongly object to the proposal to require a project

proponent to pay for monitoring of site-specific projects. Post-plan monitoring and evaluation is a function of the revised planning process and is the sole responsibility of the FS. Language should be included which requires that all monitoring and evaluations to be made be based upon the best available scientific information, techniques and methods. Also, any decisions based upon this information must be statistically significant in order to justify any change in management. . . . To ensure the oil and gas program is not suspended due to perceptions that cumulative effects exceed acceptable levels, it is critical for the FS to routinely monitor activities. It is of particular importance for monitoring to be done on areas of heightened activities on at least an annual basis. Annual monitoring of activities in these areas will give the FS the opportunity to acquire critical information useful for daily and long-term management flexibility. With advance knowledge of when thresholds are being approached, it will be possible for the FS and project proponents to develop acceptable measures to mitigate or reduce potential effects to an acceptable level. Similarly, the effectiveness of mitigation measures can be tested.

In order for this concept to work, the FS must develop a system for tracking monitoring efforts and results. In addition, a quality control process needs to be put in place to ensure that resource management objectives are clearly stated and measurable. Measurable management thresholds, which when reached require a review of existing management practices, must also be identified. An extremely important element of the monitoring effort is an inventory of resource data. Components of this database, many of which must be reflected on maps, would include: Identification of the area of concern and its ongoing uses.

An inventory of all resource activities, including oil and gas wells, fields, roads, pipelines, recreation, grazing, wildlife habitat manipulation, etc., on state and federal lands.

A yearly survey of companies regarding their future activity plans (the FS must devise a method for protecting proprietary data) so that timely development will be permitted.

A record of current surface disturbance and post-development reclamation for all resource uses (this concept ties in with the "net effects" concept).

A record of new activities that will occur over the long term to help in determining net effects of activities (we recommend the FS use completion reports as the basis for such information).

Archeology and TandE species surveys.

Review mitigation measures to determine their effectiveness.

Review the effectiveness of plan decisions and the accuracy of the NEPA impact analysis.

We also recommend the FS enter into a memorandum of understanding with other federal and state agencies with administrative or management responsibilities in the areas of concern to facilitate collection of the needed resource data. Industry may be able to provide some of the data discussed above.

The overall goal of our net effects and monitoring strategies is to:

Provide an element of flexibility in planning for the oil and gas program on federal lands,

Eliminate the need for repetitive NEPA documentation for exploration and development activities,

Provide incentives for mitigation and swift reclamation of dry holes, temporary access roads and well pads, and create a system for resource management planning, which can serve as a tool for industry, organizations and government agencies in the pursuit of their interests and missions. Increase the FS efficiency and data exchange with other surface management agencies. (Business, Denver, CO - #A25688.65300)

#### **1074. Public Concern: The Forest Service should prepare a reasonably foreseeable development scenario for analysis of effects of oil and gas development.**

##### **WHICH ANALYZES THE NET EFFECT OF LONG-TERM SURFACE DISTURBANCE RATHER THAN THE NUMBER OF WELLS TO BE DRILLED**

In order to maintain flexibility in the planning documents, PLA recommends that the FS utilize the following approach when conducting its analysis on the potential effects of oil and gas development:

##### **NET EFFECTS OF REASONABLY FORESEEABLE DEVELOPMENT**

During the land use planning process, the FS must predict the post-lease impacts that could occur from oil and gas development by preparing a reasonably foreseeable development (RFD) scenario. This forecast is normally based upon local geologic trends, currently proposed and historical activity within the planning area. As part of the RFD scenario, the FS typically quantifies the number of **wells** it anticipates will be drilled in the planning area over the life of the plan. The FS also estimates the average surface disturbance associated with wells in the area. This is accomplished by calculating average acreage disturbance figures for well pads, access roads, pipelines, facilities, etc.

This information is then used as the basis for determining environmental consequences of oil and gas exploration and development activities in accordance with each management alternative analyzed. It should be noted that while the number of wells drilled can vary by management alternative, the projected level of disturbance associated with the average well remains the same under this approach. Currently, the FS uses as its baseline for determining environmental consequences of each alternative the number of wells which could be drilled, both exploration and development, rather than net acreage disturbed by oil and gas operations. As such, the FS often fails to consider that once a well is plugged, reclaimed and abandoned, it has no adverse effect on the environment. For example, if the FS predicts 10 wells may be drilled with 5 acres disturbance each, up to 50 acres could be disturbed. We propose, however, if 5 of the 10 wells are dry and subsequently reclaimed, they should not be counted as part of the acceptable level of **long-term** impacts established in the analysis because they were short-term disturbances. Hence, industry should be given the opportunity to drill additional wells, provided they would not result in more than 25 acres of additional surface disturbance or would not exceed an acceptable level of surface impact as determined in the land management plan or post-plan monitoring. Moreover, if 10 additional wells could be drilled without exceeding the established threshold of surface disturbance, they should be allowed since they would fall within the acceptable range established during planning. The key element which must be considered in determining what level of oil and gas activity will be allowed over the life of the plan is **not** the number of wells which could be drilled, but rather the **net effect** of surface disturbance and activities.

This **net effect** approach is consistent with the newly adopted ecosystem management strategy because it relies on scientific data to establish suitable levels and patterns of use. The **net effect** approach will also have the added benefit of facilitating better land use planning and encouraging multiple-use activities, including oil and gas leasing, exploration and development, on federal lands. (Business, CO - #A25688.65300)

#### **1075. Public Concern: The Forest Service should obtain input from the Bureau of Land Management regarding leasing areas included in the roadless inventory.**

With regard to minerals, which of course, are of great interest to Oxbow Mining, the USDS should obtain input from the BLM as it makes decisions relating to unprotected resources. In our area of interest the USDA would discover that by a decision effective October 21, 1973 the Department of the Interior through the BLM established the Paonia-Somerset Known Coal Leasing Area. Subsequently, as a result of the Federal Coal Leasing Amendments Act, which was adopted in 1976, these previously designated KCLAs were reclassified as Known Recoverable Coal Resource Areas. These are designated areas that the Bureau of Land Management has deemed after extensive study to have valuable coal resources and potential coal bed methane resources as well. I am confident similar studies have been done by the USGS or the BLM with respect to oil and gas resources. If such an analysis had been done by the USDS in our areas, then it would appear to me that it would have resulted in exclusion of the 160 acres that have been included in the roadless area but also are in conflict with a federal coal lease, for after all coal resources of this value are most certainly limited resources which should be protected for development. (Association, Denver, CO - #A29223.65320)

#### **1076. Public Concern: The Forest Service should address the amount of oil reserves which lie under National Forest System lands.**

Currently, 67% of the known oil reserves in the U.S. lie under federal lands. However, access to those lands has decreased by 60% in the past ten years. The nation's dependency on foreign oil has increased to 56% on a daily basis and is expected to climb for the foreseeable future. Responsible access to oil and gas reserves is critical to our nation's energy supply; moreover, the proposals fail to consider the 21

trillion cubic feet (TCF) of natural gas that underlie available FS lands, as noted in the recent National Petroleum Council Study. (Business, Bismarck, ND - #A19269.65330)

### **1077. Public Concern: The Forest Service should use accurate data to estimate the percentage of coal that comes from National Forest System lands.**

This extraordinary analytical gap was addressed directly by the Department of Energy (“DOE”). As noted in the preamble to the Roadless Rule, following publication of the FEIS in November 2000, DOE provided information on affected coal resources to the Forest Service. The DOE analysis shows that the Roadless Rule, likely, will affect three existing coalmines in Western Colorado sterilizing at least 250 million tons of high quality, low sulfur coal. As a frame of reference, this lost coal in Western Colorado alone (which, of course, would be produced over a period of years) represents almost 25% of last year’s *total* national coal production of 1.1 billion tons.

In addition, the significance of National Forest lands as a source of high quality, low sulfur coal was downplayed by the Forest Service. The preamble to the Roadless Rule stated that the “FEIS described the coal production from [National Forest] lands as accounting for about 7% of national production in 1999.” However, as shown in recent National Mining Association (“NMA”) testimony to the Congress:

This statement implies that tightening up access simply will not have much impact on energy production from National Forest Service land. However, last year the Black Thunder Mine in Wyoming alone produced over 60 million tons of coal, which represents over 5% of national production by itself. The Black Thunder Mine is located in the Powder River Basin of Wyoming and is located on the Thunder Basin National Grasslands, which is managed by the National Forest Service. In speaking with Forest Service personnel, it was learned that they do not have a good method of estimating coal production from National Forest Service lands. A quick survey of some of the producers on the Thunder Basin National Grasslands revealed that these few mines in Wyoming accounted for 8-10% of national coal production. This completely ignores coal production from National Forest Service lands in Colorado and Utah. If accurate data were used, *the percentage of national coal production from National Forest Service Lands could very likely be 15-20%, which is a very significant percentage.* (Association, Washington, DC - #A19636.65330)

### **1078. Public Concern: The Forest Service should analyze oil and gas resource potential in roadless areas.**

The Colorado Oil and Gas Association (“COGA”) is a member organization representing the majority of oil and gas producers in Colorado, as well as allied service, supply, gathering and processing, transmission, gas distribution and power generation sectors. Colorado Oil and Gas Association is strongly opposed to the proposed prohibition of road construction on 58 million acres of “inventoried” roadless areas, including 4.4 million acres in Colorado, as well as the mandate to local forest supervisors to manage smaller parcels for “roadless values.”

Prohibition of road construction on nearly one-third of the national forest system is tantamount to an abandonment of the statutory multiple use mandate applicable to these lands. With respect to oil and gas exploration and development, it is essentially the same as new wilderness designation. The nation can ill afford to lock up huge areas of the public land base with no regard to the potential for impairing our ability to supply the energy necessary for our citizens and the economy. The EIS’s qualitative discussion about “increased exploration costs” resulting from the roadless proposal is disingenuous to say the least. Prohibition of lease road construction will preclude development of public oil and gas resources.

The 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 that would be 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, Denver, CO - #A27325.65320)

### THROUGH A PUBLIC LANDS INVENTORY OF HYDROCARBON POTENTIAL

The roadless area proposal is an example of irresponsible, negative action by the government that would foreclose access to the gas resource base without knowledge of its size and potential. It would represent one arm of the government acting at cross-purposes with clear public policy goals expressed by another arm of the government.

COGA asserts that the roadless area proposal should be withdrawn unless and until a public lands inventory of hydrocarbon potential has been completed and incorporated into the analysis, including the impact access restrictions. (Business, Denver, CO - #A27325.65320)

## 1079. Public Concern: The Forest Service should accurately assess the impact of the Roadless Area Conservation Rule on energy potential.

### ON THE LITTLE MISSOURI NATIONAL GRASSLAND

The Forest Service actually represented to the public that the roadless regulation would not interfere with energy production. 66 Fed. Reg. 3244, 3249, 3261 (2001) (less than 1 million acres of high potential land affected). In response to a letter sent by the Western North Dakota counties, the Forest Service did not identify the roadless rule as having any effect on leasing but that about 72,890 acres were “not available” due to management direction or other administrative decisions. Letter of Frederick Norbury to Constance Brooks, April 25, 2001. These statements cannot be reconciled with other Forest Service documents that at least half of the 182,000 acres that the Forest Service classified as high potential, would be closed or restricted to energy development, Vol. 17, 1950-3/Minerals/5903.pdf. The Forest Service decided in December 2000 to impose no exception for oil and gas development on the basis that it was not a “widespread” problem. This conclusion certainly contradicts the Administration’s energy direction and policy and suggests that earlier assurances that the roadless rule had minimal impact on production were mistaken. All of these acreage figures do not address the other 36,000 acres of designated roadless conservation areas.

It is likely that the Forest Service has understated the energy potential on the Little Missouri National Grassland, especially since virtually all of the roadless areas have been under lease at some time, and much of the area is still under lease. (Organization, Denver, CO - #A21358.10135)

### IN WYOMING

We are concerned that the geological analysis underlying these rules, which will have a profound effect on the State of Wyoming, is inadequate. Due to the extremely large area of coverage (continental scale) of this document, it must cover areas of tremendous diversity and differences. To lump natural resource issues in Wyoming with the same issues in Arizona or Alabama necessarily results in a superficial analysis, which cannot be accurate and detailed. As a result, we cannot have sufficient understanding of specific issues for any area of the county, much less Wyoming. For example, Wyoming has substantial platinum and palladium resources that could be put off limits but the proposed rules, yet the document does not mention the resource, much less evaluate the impact of shortages of these vital metals on the national economy. (State Agency, Cheyenne, WY - #A22609.65000)

## 1080. Public Concern: The Forest Service should address the overall process of mineral exploration.

### THROUGH DETAILED STUDIES ADDRESSING MINERAL POTENTIAL IN ROADLESS AREAS

I strongly urge the Forest Service to give full consideration to the overall process of mineral exploration and development as it applies to access. Complete detailed studies addressing mineral potential and necessary access are imperative and essential to developing balanced national forest plans that include domestic mineral development. (Individual, Reno, NV - #A21755.65320)

**1081. Public Concern: The Forest Service should provide a legal review to determine whether the Roadless Area Conservation Rule can prohibit access to mining claims.**

Prior to adoption of the proposed action, we suggest that a legal review be conducted to determine if administrative action of this nature can prohibit access to mining claims on the NFS lands. (Elected Official, Roseburg, OR - #A11811.65310)

**1082. Public Concern: The Forest Service should justify its claim that inventoried roadless areas would be among the last areas entered for exploration and development.**

To point out one more important error in the Forest Service's underlying analysis of impacts on coal mining production and reserves, in the face of the aforementioned DOE comments and those of NMA and others (including the Companies), the Forest Service replied in the preamble" . . . even if resources do underlie inventoried roadless areas, they would be among the last areas entered for exploration and development . . ." This assertion is not supported in the administrative record of the Roadless Rule.

Indeed, to the contrary, and by way of example, coal reserves underlying inventoried roadless areas adjacent to Arch's West Elk Mine in Colorado would be among the *first* areas entered into for exploration and development (not the last) in the next phase of that mine . . . . Indeed, Arch is currently experiencing some Roadless Rule-based resistance from Forest Service officials regarding the need to enter into those areas, as is discussed further in Section VIII.2 of these comments. (Association, Washington, DC - #A19636.65330)

***Allow Mining, Oil, and Gas Development*****1083. Public Concern: The Forest Service should ensure access for mining.**

Despite the fact that Roadless Area rule has been enjoined, and has not been implemented, there is still a proposed stipulation to the Lease Modification that "road building prohibition will apply to this lease modification." The environmental community has used the fact this area has been designated as an IRA (although enjoined) to block the ability of the operator to access the surface for activities necessary to produce from the mining lease. (Business, Wright, WY - #A23085.45500)

Access for the exploration of locatable minerals pursuant to the General Mining Law of 1872 is not prohibited by this rule. Nor is reasonable access for the development of valid claims pursuant to the General Mining Law of 1872 prohibited. In some cases, access other than roads may be adequate for mineral activities. This access may include, but not limited to, helicopter, road construction or reconstruction, or non-motorized transport. Determination of access requirements for exploration or development of locatable minerals is governed by the provisions of 36 CFR part 228. (Individual, Cottage Grove, OR - #A27337.40000)

**AS REQUIRED BY LAW**

We argue that the proposed rule takes away the public right of access to minerals on public lands. Any review of statutory and judicial case law proves that the Forest Service does not have authority to promulgate rules or regulations that prevent access to public lands for prospecting, locating and developing mineral resources. From the 1872 Mining Law, to the Organic Administration Act of 1897, to the Multiple-Use and Sustained-Yield Act, Congress has maintained that nothing shall be construed so as to offset the use or administration of mineral resources of national forest lands. By enacting the proposed rule, the Forest Service oversteps its authority by denying public access to designated mining areas. (Association, Pocatello, ID - #A20842.65320)

**AS REQUIRED BY THE FOREST SERVICE MANUAL AND REGULATIONS**

Forest Service Manual and Regulations Specifically Acknowledge Right of Access.

The Forest Service Manual Chapter on Mining Claims (Chapter 2810) specifically acknowledges right of access to a mining claim: The right of reasonable access for purposes of prospecting, locating and mining is provided by statute. Such access must be in accordance with the rules and regulations of the Forest Service. However, the rules and regulations may not be applied so as to prevent lawful mineral activities or to cause undue hardship on bona fide prospectors and miners. Forest Service regulations also emphasize protection of miner's right to access. (See 36 CFR 228.1—mining laws confer a statutory right of entry and 36 CFR 261.1(4)(b)—regulatory prohibitions shall not preclude activities authorized under the Mining Law). (Business or Association, Washington, DC - #A29622.65320)

#### EXCEPT IN WILDERNESS AREAS

NWMA would add that permitting aerial access only or precluding surface occupancy can only legally be applied by the Forest Service in designated Wilderness Areas, and then, only in certain circumstances.

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.” (Association, Spokane, WA - #A17351.65320)

### 1084. Public Concern: The Forest Service should allow mineral, oil, and gas exploration and extraction in roadless areas.

On the national level the Department of Energy study, “Undiscovered Natural Gas and Petroleum Resources Beneath Inventoried Roadless and Special Designated areas on Forest service Lands analysis and Results”, shows that of the 208 oil and gas lays examined, 116 are affected by the roadless rule. It is estimated that 11.3 trillion cubic feet of natural gas would be unavailable for exploration and development activities. In Montana, the Rocky Mountain Division of the Lewis and Clark National Forest has been estimated to contain a minimum of 1 tcf of gas. The Beaverhead and Deerlodge National Forests also are gas potential areas. The Missouri Breaks National Monument has estimated reserves of 1 bcf of natural gas. The Breaks are BLM lands, but this monument added to the Roadless Initiative, the recently adopted transportation rule, roads manual, as well as Forest Service planning regulations that fail to integrate oil and gas resources in land use considerations, create an inextricably linked agenda aimed at precluding multiple-use activities on federal public lands.

MPA is encouraged by the Energy Policy put forward by the Administration. We hope the balanced approach to all energy resources in that document can guide the Forest Service and the BLM in their land use planning, including any plans for unroaded and roadless areas. With that guidance for energy resources, MPA believes existing planning processes are adequate to protect wildlife, watershed and recreational amenities on the National Forest system (NFS) while preserving multiple-use. (Business, Helena, MT - #A29111.50200)

Locking up the natural resources as de facto wilderness is wrong. Exploration for the extraction of oil, gas, coal, and minerals should be allowed in the forests. (Individual, Miami, AZ - #A880.90100)

Existing mining activities, if following environmental regulations should be permitted continuing the scope of present activities. (Individual, Painted Post, NY - #A357.90000)

I believe it would be in the best interest of the country to exempt oil and gas exploration and production from any future rule(s) that would, in any way, limit the building of roads in National Forests. Our critical reserves of oil and gas must not be locked away administratively. (Individual, Denver, CO - #A4566.90710)

**TO HELP LOWER THE COSTS OF FUEL IN THE UNITED STATES**

If there is oil there we can use to help lower the costs of fuel in the US why not tap into it? In this day and age there are ways to do this without destroying the area and it would have to be carefully planned. (Individual, No Address - #A4764.90710)

**BECAUSE HARDROCK MINERALS ARE CRITICAL COMPONENTS FOR DEFENSE TECHNOLOGIES**

Hard-rock minerals produced from National Forest lands comprise critical facets of many of the nation's most advanced and vital commercial and defense technologies. (Association, Washington, DC - #A19636.65340)

**ONLY IF COMPANIES AGREE TO CLEAN UP EXISTING SUPER-FUND SITES**

As for mining interests that want to continue poking holes in the ground like the thousands that surround the town I live in, I can only lend my support to their cause if they will take care, out of their own pockets, of all the super fund sites caused by the previous rapers. The cleanup of these mining sites is coming out of the pockets of the taxpayer. Let those that stand to profit from a relaxed administration's "guarding" of the public trust start with Leadville, Colorado and proceed with all the other messes created by their industry and then once that task is accomplished I will lend my support to their ways. They too want it all without any accountability. By any measure, they are unreasonable. (Individual, Crested Butte, CO - #A30745.65370)

**1085. Public Concern: The Forest Service should allow mineral, oil, and gas exploration and extraction by various methods.****BY SLANT DRILLING OR OTHER TECHNIQUES WHICH DO NOT DISTURB THE SURFACE**

The roadless areas should be withdrawn from mining and mineral leasing, except in cases where areas can be leased for oil and gas production using a no surface occupancy (NSO) stipulation which would allow for extraction by slant drilling or other techniques which don't disturb the surface of the land inside the roadless area. I think slant drilling is a viable technology that could open up some areas to mineral production without having to build new roads. (Individual, Vail, CO - #A5371.90721)

**BY MANUAL MEANS ONLY**

Mining should be restricted to manual means only. (Individual, Cleveland, SC - #A21250.90720)

**1086. Public Concern: The Forest Service should allow mineral, oil, and gas exploration and extraction in certain areas.****IN THE ROCKY MOUNTAINS**

The National Petroleum Council's December 1999 to the Secretary of Energy found that significant access restrictions already restrict or preclude development of some 137 trillion cubic feet (TCF) of known natural gas reserves in the Rocky Mountains, twice as much as is unavailable off the coastal U.S. How can the domestic petroleum industry find and develop the resources to satisfy the NPC's identified need for an additional 7 TCF of annual gas production by 2010 if we continue to lock-up the public lands essential to meeting that demand? (Business, Denver, CO - #A27325.65320)

**IN THE ROCKY MOUNTAIN STATES**

The National Petroleum Council's study, "Natural Gas, Meeting the Challenges of the Nation's Growing natural Gas Demand," has projected that 460 trillion cubic feet (TCF) of natural gas remain within the Rocky Mountain States. The FS controls approximately 8 percent of the 288 TCF occurring on federal lands. Up to (21 TCF) of natural gas is projected to underlie these lands. Of additional concern, another 2 percent of the land base is estimated by the NPC to be threatened by potential new wilderness designations. Nowhere in any of the roadless documents has the FS given any consideration of this vast resource nor the consequences the roadless initiative will have upon industry's ability to explore for and develop this clean fuel source.

The Department of Energy Study, Undiscovered Natural Gas and Petroleum Resources beneath Inventoried Roadless and special Designated Areas on Forest Service lands analysis and Results

examined 208 oil and gas plays. Of those 208 plays, 116 are affected by the roadless rule. It is estimated that 11.3 trillion cubic feet of natural gas would be unavailable for exploration and development activities. While the nine largest plays in the study make up around 14% of the roadless areas, these areas represent (83%) of the gas resource contained in the inventoried roadless areas. PLA was involved in helping develop the parameters of this study, and despite criticism by those opposed to energy exploration and development in these areas, the study agencies to reduce impediments to energy development and to take actions of expedite energy-related projects, it is important for the Forest Service to reconsider its roadless program and its impact on the energy resource availability. (Business, Denver, CO - #A29112.65330)

#### IN COLORADO AND UTAH

Allow for the development/designation of coal/energy producing regions within the national forests, particularly in Colorado and Utah. (Business, Wright, WY - #A23085.90710)

#### IN UTAH

In 1991, PacifiCorp submitted a Lease by Application (“LBA”) in the North Trail Mountain/Cottonwood Creek Area of the Forest that contains 75 million tons of recoverable coal. This coal lease tract is now held by the State of Utah because of the 1998 coal land exchange (“1998 Exchange”) between the State and Federal Government resulting from the establishment of the Staircase-Escalante National Monument (“Monument”). See Utah Schools and Lands Exchange Act of 1998, Pub. L.No. 105-335, 112 Stat. 3139 (Oct. 31, 1998). As much as 25 percent of the state and federal coal leases held by PacifiCorp are in inventoried roadless areas, including the area of the LBA, a substantial reserve of coal mine operator. This outcome could occur despite significant industry interest in exploring around these areas on the Wasatch Plateau for more economically recoverable coal deposits. New leasing and Plateau for more economically recoverable coal deposits. New leasing and exploration, however, would require surface access roads to determine quality, quantity, geology, and engineering conditions and to control, minimize, and mitigate any damages from mining-induced subsidence.

PacifiCorps’s current lease development activities and future leasing opportunities could also be significantly impaired by the Roadless Rule on its 1998 Exchange.

PacifiCorp is concerned that the delay and expense resulting from the requirement for EIS preparation to conduct any exploration that might be allowed in roadless area, as well as forest plan amendments and revisions precipitated by the Roadless Rule will impose substantial costs and delays in data acquisition. As a result, significant amounts of economically recoverable coal may be bypassed.

Application of the Roadless Rule to the areas covered by the LBA and the Mill Fork lease resulting in the bypassing of these two significant reserves is contrary to the purpose and intent of establishment of the Monument and the 1998 Exchange.

PacifiCorp is grateful that the Forest Service in its Roadless Rule acknowledged that the reserves granted to Utah in the 1998 Exchange “would be considered outstanding rights,” FEIS, Vol. 1 at 3-258, and, thus, the construction of portal and transportation facilities necessary for the development of these resources, “as an outstanding right . . . would be excepted from the prohibition alternatives,” FEIS, Vol. 1 at 3-260. See also 66 Fed.Reg. at 3265 (access to Utah state-owned coal would be guaranteed based on existing rights). *But, the mere designation* of the areas within which Utah was granted coal reserves and within which PacifiCorp plans to conduct lease development activities thwarts the intent of Congress and denies Utah and its lessees the full benefit of the bargain struck in the 1998 Exchange.

It was understood by the parties to the 1998 Exchange that the resources granted to the State of Utah could be developed subjected only to generally applicable environmental laws without any special encumbrances on the development of the coal resources. (Association, Washington, DC - #A19636.65330)

The Roadless Rule does not purport to repeal any of the multiple-uses on the lands involved, but it very well might have that effect. For example, in Utah, some of the “inventoried” tracts of land are over the Central Utah coal reserves. These coal seams may only be mined by underground techniques, so there is no danger of the effects of surface mining. Yet, in order to offer these tracts up for leasing, and then lay out the necessary mining sequence plans, and thereby obtain the necessary financing for the operations,

test core sampling holes must be drilled from the surface. This requires a road to the drill sites. This road could be reclaimed immediately after use. But the Roadless Rule does not even allow for temporary roads. If time had been taken to examine these and other issues, perhaps a carefully written local stipulation could have been crafted for these coal areas.

Similarly with the general mining laws of the nation. Because general prospecting for minerals is not prohibited by the Roadless Rule (and if otherwise allowed by forest plan revisions), any person who discovers valuable mining resource because of the inability to build a road. The Roadless Rule therefore has the effect of closing the areas to future mineral prospecting, leasing and mining. The state demonstrated in its comments of July 17, 2000 that there are areas with such resources which are known today. (State Agency, Salt Lake City, UT - #A20742.65320)

#### **IN THE NATIONAL MONUMENT IN UTAH**

Why don't you open the national monument in Utah to the huge supply of clean-burning coal locked up by Clinton. . . . Open up our national forests and monuments to the much needed raw materials they contain. (Individual, Oceanside, CA - #A27306.90100)

#### **IN THE MANTI LASAL NATIONAL FOREST**

Historic activities, such as coal mining on the LaSal National Forest, should expressly and presumptively be allowed. The Roadless Area FEIS clearly noted that local economies are highly dependent on these activities. It also correctly notes that the economies of these rural communities are highly inelastic. (Business, Wright, WY - #A23085.90710)

#### **IN MONTANA**

Part of the Forest Planning process involves making inventories of the mineral resources in roadless areas. These inventories show substantial regions of high mineral potential in the roadless lands of Montana's National Forest. Was the gathering of these inventories a mere empty exercise? What provision will be made to provide future access to these areas of high mineral potential? (Organization, Missoula, MT - #A28141.65320)

#### **IN NORTH DAKOTA**

In North Dakota the roadless conservation areas have been under *de facto* wilderness management since the late 1990s. The Forest Service has not approved or offered for sale any leases located in these roadless areas. *See e.g.* DPG FEIS, App. C. 127, 132. The Forest Service has objected to and threatened counties who proposed road rehabilitation and construction. These two policies combined to delay and interfere with energy development. The roadless administrative record (RAR) states that at least half of 182,000 acres classified as high oil and gas production potential will be closed to energy development or greatly restricted. RAR, Vol. 17 1950-3/Minerals/5903.pdf. The impact of roadless designation on county governments, revenues, access, and local industries is significant. See HAND comments on economic costs of proposed wilderness. The comments were written before the spike in oil prices and the increased demand for energy. The Department of Energy (DOE) sharply criticized the roadless rule for its effects on energy development. However, the DOE report addresses potential production in the Rocky Mountain Front and ignores North Dakota, which actually produces half of the oil and gas produced in the National Forest System. The Forest Service internally admits that the roadless designations interfere with likely development in these areas. The cost in terms of state revenue, county revenues and national energy policy has been largely unquantified. These areas were entirely leased in 1987 but the low development management prescription has actively discouraged drilling and production. By 2001, many of the leases were not extended or renewed. The Forest Service FEIS admits that they declined to renew or issue leases due to "management policy." DPG FEIS, App. C 134. Given the lack of wilderness qualities, the comparative value of the land for energy production and continued agriculture use greatly outweigh the other uses. (Organization, Denver, CO - #A21358.65300)

#### **IN THE DAKOTA PRAIRIE GRASSLANDS**

The Dakota Prairie Grasslands are a vital component of North Dakota's economy. They provide 27% of the state's oil production and contain 30% of the state's producing wells, providing nearly 1,000 jobs. The oil industry's activities on the grasslands bring in nearly \$15 million per year in tax revenues and

only temporarily disturb a very small portion, less than one-half of one percent of the grassland's surface area.

The oil and gas industry in North Dakota has explored in and drilled upon the grasslands for nearly 50 years and has restored over 500 wells and 480 miles of roads, or 45% of all roads constructed by the industry.

The oil and gas industry and other users, including wildlife, can co-exist in the Dakota Prairie Grasslands because reclamation is fast, effective, and very successful. That may not be true in National Forests in other states where reclamation can be more of a challenge.

The Tesoro Refinery in Mandan receives 36% of its supply from the grasslands, the Roadless Initiative places the future of the refinery at risk because it eliminates potential new wells and pipeline rights of way. The future of the refinery is vital to the State and local economies, as well as the national interests in continuing to meet the demand for gasoline and other refined crude oil products. (Business, Bismarck, ND - #A19269.65330)

#### **IN ALASKA**

New roads may be required for the development, under strict guidelines, of a sound National Energy Policy. A group of Americans would deny oil exploration in Alaska, when such action would cause little change to this area (affecting only a very small amount of land) and would be of great benefit for this country. (Individual, Albuquerque, NM - #A5739.65300)

#### **IN THE ABSAROKA-BEARTOOTH WILDERNESS**

In considering the designation of the Absaroka-Beartooth Wilderness in 1978, Congress specifically drew the boundaries to exclude the Stillwater deposit. Through the Roadless Rule, however, the Forest Service could well thwart by regulation that carefully considered legislative decision. Congress had extensive mineral information in making its determination to designate that Wilderness.

As we have discussed previously, *application* of the Roadless Rule directly contravenes express congressional intent to allow unimpeded development of the important Stillwater mineral resources. (Association, Washington, DC - #A19636.65310)

#### **IN BIG SPRINGS AND JERRIT CANYON**

Under the January 12 rule, 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 project. There is a significant potential for the loss of an otherwise economic resource and the associated loss of local jobs. Thus, the important value of economic well being for nearby communities must be considered.

Thus, the January 12 Rule must be modified to ensure that reasonable road access is preserved in roadless areas in order to explore for and develop locatable mineral resources pursuant to the 1872 Mining Law and the intent of Congress in designating wilderness area boundaries, and to maintain local economic vitality. (Association, Spokane, WA - #A17351.65320)

#### **BY MINING OPERATIONS CONTROLLED BY THE STILLWATER MINING COMPANY**

Two significant portions of the Stillwater platinum/palladium ore deposit fall within inventoried roadless areas in both the Custer and Gallatin National Forests, comprising an estimated 25 percent of the deposit. Effective future operation of the Stillwater Mine will require new roads in these areas. Roads will be required for the construction of ventilation shafts and emergency escape ways vital to ensure mine safety. Helicopters or other alternative transportation methods will not be adequate and, even where such alternatives could be used, significant increased costs would be imposed on Stillwater. Thus, the Roadless Rule threatens significant harm to the operation of this unique and important mine. (Association, Washington, DC - #A19636.65320)

The January 12 rule seriously affects 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. Significant areas of the SMC mining claim group along the complex are adversely

affected. Roads will be required to construct additional ventilation shafts and escape ways 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. Bypassed mineralized areas may be lost. Expensive changes in mining methodology may be required. In addition, the January 12 Rule illegally threatens to halt further exploration activities in the Stillwater complex. (Association, Spokane, WA - #A17351.65330)

**BY MINING OPERATIONS CONTROLLED BY BURLINGTON RESOURCES OIL AND GAS COMPANY L.P.**

Burlington Resources Oil and Gas Company L.P. (BR) is filing these comments to reiterate our specific concerns with respect to possible implications of any proposed Forest Service (FS) Roadless Area policy on any BR mineral or leasehold acreage owned or to be acquired by BR and to seek clarification that our acreage will be exempted from any new restrictions on access to it. (Business, Midland, TX - #A22626.91110)

**1087. Public Concern: The Forest Service should clarify that mining leases issued by the Bureau of Land Management will not be affected by the Roadless Area Conservation Rule.**

Clarify that coal lease renewals and Logical Mining Units, issued by the Bureau of Land Management, have valid existing rights, and that the roadless area prohibitions will not apply to these administrative functions. (Business, Wright, WY - #A23085.65310)

**IN GUNNISON COUNTY**

The land area of Gunnison County includes 86% public lands of which a significant portion is currently designated as either wilderness or roadless. Although we highly value our wilderness and roadless areas, as they to play an important role in our economic well being, the proposed rulemaking needs to identify a careful mechanism to support present operations like the existing coal mines which are particularly impacted by this rulemaking. (Elected Official, Gunnison, CO - #A22061.10112)

**1088. Public Concern: The Forest Service should exempt geothermal leases from the Roadless Area Conservation Rule.**

**INCLUDING NEW GEOTHERMAL RESOURCE AREAS IDENTIFIED BY THE BUREAU OF LAND MANAGEMENT**

On behalf of Mammoth-Pacific LP, I am writing to provide comments on Phase II of the U.S. Forest Service's roadless initiative. Specifically, we request that geothermal leases be specifically exempted from the initiative.

Located in Mono County, California, Mammoth Pacific facilities generate up to 40 megawatts of renewable, environmentally sound electricity, which can power approximately 40,000 homes. This electricity, which is generated by using the earth's natural heat, displaces the need to use fossil fuels for power generation, and has no combustion emissions. For natural gas, that is a reduction of over two billion cubic feet per year and over one hundred thousand tons of carbon dioxide per year. In addition, with an annual payroll of over \$1.4 million, Mammoth Pacific plays an important role as a local employer and as one of the largest property tax payers in Mono County. The G3 facility, located on public land, also paid \$1 million in royalties to the Minerals Management Service in 2000 for electricity sales.

Mammoth Pacific has obtained and currently maintains geothermal steam leases on U.S. Forest Service lands, some of which are in areas included in the roadless initiative. Although we strongly support your efforts to protect our natural resources, we believe that this initiative may have the unintended consequence of restricting these leases and these leases of other geothermal resource areas.

As Congress and the Administration look for environmentally sound solutions to our energy crisis in California and elsewhere, efforts to restrict existing geothermal leases is inconsistent with laws and public policies specifically aimed at diversifying our nation's energy production sources and reducing our nation's dependence on fossil fuels. Geothermal energy is an environmentally sound alternative source of energy that has no significant impact on the environment.

Furthermore, if the roadless initiative impairs the lessor's rights to develop the geothermal resources that occupy the lease to any extent, it takes value from the lease—a lease that the lessor has tried in good faith to maintain and enhance under the terms of its lease(s).

For these reasons, we believe that existing geothermal leases should be specifically exempted in the roadless initiative.

In addition, we understand that the Bureau of Land Management (BLM) has been directed by the Administration to review and update its knowledge of geothermal resource areas with the intent of possibly adding new lease areas. If the roadless initiative includes new geothermal resource areas identified by the BLM, these areas should also be exempt. (Organization, Mammoth Lakes, CA - #A17659.91710)

## *Do Not Allow/Restrict Mining, Oil, and Gas Development*

### **1089. Public Concern: The Forest Service should not allow mineral exploration in roadless areas.**

New mining/drilling activity should be prohibited. (Individual, Painted Post, NY - #A357.90000)

I urge you to uphold President Clinton's ban on road building and logging in our national forests. But the ban should do more: it should also prohibit all extractive activities, including mining, and oil and gas pumping. It should prohibit all power vehicles. And it should apply to all our forests—from the smallest to that great national treasure, the Tongass. (Individual, Candler, NC - #A160.90110)

Mining, oil and mineral exploration should be prohibited. (Individual, No Address - #A565.90720)

Mining has the potential to impact all of the ecological and amenity values of roadless areas that the Forest Service is committed to protecting in this process—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 can become permanent scars on the land.

Speculators use the Mining Law to file nuisance claims or to mine the pockets of investors and citizens of the United States. While these activities can seriously degrade the ecological, recreational, and aesthetic values of roadless areas and can cost the public millions of dollars, they seldom produce minerals that benefit the public. Many impacts from mining are wholly unnecessary for the reason that they either take place on mining claims that do not support the discovery of a valuable mineral deposit, and are therefore, not valid, or are associated with access to mining operations on invalid claims. According to the Department of Interior, "Rights to mine under the general mining laws are derivative [of] a discovery of a valuable mineral deposit and absent such a discovery denial of a plan of operations is entirely appropriate." Recreational miners, while failing to meet the requirements of the 1872 Mining Law, are granted the privileges to impact sensitive riparian areas and ecologically valuable low gradient stream reaches beyond those accorded any other use of the national forests.

Specific examples of the impacts of mining on roadless areas can be found in the North and South Kalmiopsis roadless areas comprising approximately 190,000 acres adjacent to the Kalmiopsis Wilderness on the Siskiyou National Forest in southwest Oregon. (Organization, Cave Junction, OR - #A17235.90720)

There is an exquisite stream in Siskiyou, Rough and Ready Creek, that harbors along its banks a number of rare and fragile plant species that don't exist anywhere else; and there is a miner claiming over 4000 acres along and around that creek who is attempting to force the federal government to let him mine and remove rock and ore samples in whatever way he chooses, or else pay him \$600,000,000. The operation he has in mind for his Nicore mine is unlikely to come close to paying that kind of money, and it would destroy the Rough and Ready area. I don't believe the Rule would be enough to make him give up completely, but it would help enormously in protecting Rough and Ready and other such pristine places from being devastated by unimpeded mining activity. (Individual, Medford, OR - #A15234.10110)

**1090. Public Concern: The Forest Service should not allow mineral exploration by various methods.****ACID MINE DRAINING**

If land is being cleared for mining, one of the most significant negative impacts is acid mine drainage. This can lead to extensive damage to soil and potable water supplies. (Individual, East Aurora, NY - #A6187.65360)

**GOLD MINING TECHNIQUES**

Mining activities, especially new techniques used to mine gold, can be extremely destructive to the environment and pose serious threats to public health including contamination of groundwater and drinking water supplies. While not explicitly mandated as a "multiple use" of the forest, mining law authorizes and even encourages mineral development in the national forests. Unfortunately, many of the most remote and pristine areas of our forests are vulnerable to mineral development, including many inventoried roadless areas. (Organization, Charlottesville, VA - #A15659.90120)

**RECREATIONAL MINING**

There will no doubt be applications for so called "recreational mining." It too should be prohibited; recreational mining for gold or other precious metals with a dredge produces large amounts of dirt that destroys spawning beds for salmon and other fish. It also destroys habitat for the aquatic macro invertebrates on which fish feed. (Individual, Salem, OR - #A13948.90720)

**1091. Public Concern: The Forest Service should not allow mineral exploration in certain areas.****IN THE TONGASS NATIONAL FOREST**

I strongly oppose allowing oil drilling in Alaska's Tongass and other previously protected areas of our national forests. I understand that the benefits from drilling the known sources in this area would be minimal and short lived. (Individual, Danville, VA - #A1158.90720)

**IN THE HUMBOLDT-TOIYABE NATIONAL FOREST**

A ban on mineral exploration road building is essential if roadless areas on the Humboldt-Toiyabe National Forest in Nevada are to be protected. For example, between 1985 and 1997, approximately 350,000 acres of Forest Service roadless areas were lost, primarily to mining and exploration. This number is based on the following: Of the total area of areas identified in the Humboldt and Toiyabe Forest Plans in 1985, approximately 350,000 acres no longer qualified as roadless in the GIS inventory completed in support of forest plan revision in 1997. Based on local forest watch groups' experience, most of the land, except in the Schell Creek Range, was roaded by mining or exploration projects.

Currently, there are various exploration projects ongoing in roadless areas in Nevada. These include: Arc Dome south, the Toiyabe Crest, Bunker Hill, Georges Canyon, land directly adjacent to the Alta Toiyabe Wilderness, and Mahala Creek in the Independence Range. Because only a few percentage of these exploration activities lead to full-scale mining operations, the Forest Service should protect these roadless areas by requiring exploration without road building. Mining in the above mentioned areas should not be permitted. (Organization, Portland, OR - #A12004.90720)

**IN THE SOUTHERN APPALACHIANS**

Two recent examples from the Southern Appalachians illustrate the very real threat to roadless areas from mining activity and mining rights in the forest.

In Laurel Fork of the George Washington National Forest, a private oil and gas company was poised to exercise its lease rights in this magnificent and pristine roadless area. With a proposed pipeline along its borders and active leases beneath its surface, Laurel Fork was only spared by legal intervention and a negotiated settlement whereby the gas company agreed to relinquish its surface rights in Laurel Fork. The Forest Service has since amended its forest plan to preclude new oil and gas leases in the area.

The Devil's Fork Area of the Jefferson National Forest is another roadless area whose status is threatened by mining pressure. Due to private mineral rights in Devil's Fork, the Forest Service has

apparently removed Devil's Fork from the roadless area inventory. The area is clearly deserving of roadless status but for the existing mineral leases and rights associated with those leases. (Individual, Asheville, NC - #A22623.90720)

#### IN NORTH DAKOTA

With the overwhelming majority of the Little Missouri National Grasslands leased for oil and gas development I believe it is safe to conclude the Grasslands have been used in an exploitative manner. As mentioned earlier in North Dakota more than half of the roadless areas on the Little Missouri National Grasslands have disappeared in the last 30 years. In large measure this is the result of exploitative oil and gas development. Where we once had close to 450,000 acres of roadless areas, areas contain undeveloped oil and gas leases. Given this it is almost a forgone conclusion that oil and gas development will occur in many of these areas. Because of this leasing I believe the acreage of unroaded roadless areas may decline in North Dakota between this generation and the next more-so than many realized. I daresay few areas in the United States have born the brunt of declines as great as these.

In addition, new technologies, tax credits and development incentives serve to increase the extent of oil and gas development on the landscape, as well as the longevity and permanence of individual oil and well fields. The current administration is also forwarding policies that expedite oil and gas industry, such things harbor a downside in terms of landscape conservation. What might have once been on the landscape for 10 years or not at all, may now be there for 30 years or more. (Individual, Bismarck, ND - #A29119.65340)

#### IN THE GEORGE WASHINGTON AND JEFFERSON NATIONAL FORESTS

Two recent examples illustrate the very real threat to roadless areas from mining activity and mining rights in the forest. In the Laurel Fork Area of the George Washington National Forest, a private oil and gas company was poised to exercise its lease rights in this magnificent and pristine roadless area. With a proposed pipeline along its borders and active leases beneath its surface, Laurel Fork was only spared by legal intervention and a negotiated settlement whereby the gas company agreed to relinquish its surface rights in Laurel Fork. The Forest Service has since amended its forest plan to preclude new oil and gas leases in the area.

The Devil's Fork Area of the Jefferson National Forest is another roadless area whose status is threatened by mining pressure. Due to private mineral rights in Devil's Fork, the Forest Service has apparently removed Devil's Fork from the roadless area inventory. The area deserves roadless status but for the existing mineral leases and the rights associated with those leases. (Organization, Charlottesville, VA - #A25689.65340)

### **1092. Public Concern: The Forest Service should prohibit mining activities in roadless areas.**

#### **DUE TO THE ASBESTOS FIBERS CARRIED BY MINERS INTO HOMES AND TOWNS**

The Seattle Post-Intelligencer has reported in a series of articles of the damage to human life by asbestos fibers carried by miners and the wind from tailings into northwest Montana homes and lives. This has been repeated where historic asbestos has been mined or, inadvertently, disturbed when other minerals were stripped from the earth (where associated with asbestos). You know these stories, this history and the terrible disease unleashed. (Individual, Mercer Island, WA - #A27540.65360)

### **1093. Public Concern: The Forest Service should revoke inactive mining claims.**

Access to private lands in these areas - particularly mining claims that are nothing more than recreation cabins for snowmobiling, hunting, etc. should be disallowed and claims revoked. (Individual, Missoula, MT - #A6141.90110)

**1094. Public Concern: The Forest Service should prohibit drilling in the National Forest System.**

Please keep the national forest system as it is, do not open it up because of pressure from other groups or the government. Positively do not open it up to drilling of any kind. (Individual, Orwell, OH - #A11129.10150)

**IN THE NEW YORK NATIONAL FINGERLAKES FOREST REGION**

The Roadless Area Conservation Rule should be retained and implemented as is. The Bush administration needs to do all that it can to ensure protection of America's few remaining roadless areas. . . . Preparations should . . . stop for drilling (vertical or slant drilling) in the New York National Fingerlakes Forest region. (Individual, Rochester, NY - #A8831.10150)

**1095. Public Concern: The Forest Service should oppose oil drilling in the Alaska National Arctic Wildlife Refuge.**

We do have some other deep concerns.

Simply put they are:

That this roadless issue will be sacrificed to the passage of drilling in ANWR. We can only hope that you will make a supreme effort to not let this happen. (Association, Cody, WY - #A19163.16100)

**BECAUSE IT WILL NOT PROVIDE LONG-TERM BENEFITS**

I wish that you would not drill for oil in ANWAR in northern Alaska. Please. It won't do any good. Well, perhaps temporarily but not long term, and long term solutions are what you really should be seeking out and using. Think solar, waterpower, or windmills. (Individual, No Address - #A4548.65300)

I know out of doing a lot of research that drilling for oil in the Arctic is only going to give us a major disaster and you would not get enough to make a difference. (Individual, Spokane, WA - #A21843.50000)

I just don't see why Bush wants to ruin some of our precious wildlife reserve when we can get oil from other places or use more of an environmentally friendly form of energy. Please consider what I have said because if Bush allows this drilling to begin, then it is only a matter of time before it occurs in other places. I would like to be able to show my kids someday open green spaces with wildlife, not just cement streets and polluted air. (Individual, La Crosse, WI - #A1385.70300)

## Grazing

### Summary:

**General Comments** –Several individuals ask the Forest Service to address how grazing in roadless areas will be handled in the future, and to address the impact of roadless designations on rangeland health and management. One individual urges the Agency to insist that ranchers accept the risk that their herds will be subject to natural predators by not demanding that predators be destroyed or relocated. Another individual suggests that grazing rights should not automatically go to the same rancher every decade.

**Funding** – One individual suggests that the Forest Service should sell unneeded grazing land to people who hold leases.

**Grazing** – Some respondents urge the Forest Service to allow grazing in roadless areas. According to one individual private properties and communities could benefit by grazing on forest grounds to keep fuels from building up. Others suggest that the Roadless Area Conservation Rule should make it clear that grazing is a permissible use within these areas.

Respondents believe that the Forest Service should protect access to livestock and range facilities. One individual remarks that there needs to be access to livestock and associated activities such as delivering salt and water, mending fences and taking trailers to sick or injured stock.

A number of respondents state that grazing should be restricted. Several individuals request that the Forest Service prohibit grazing on all National Forest System lands. They believe it degrades the environment and has little fiscal pay off. Others say that it should be regulated in roadless areas, particularly in riparian areas and recreational campsites.

### *Grazing General*

#### **1096. Public Concern: The Forest Service should address how grazing in roadless areas will be handled in the future.**

Other concerns related to this issue are the lack of information regarding the specifics regarding how grazing on current roadless areas will be handled in the future—will it be allowed; if not, how will it be prevented; if only reduced, by how much? (Individual, No Address - #A448.65120)

#### **1097. Public Concern: The Forest Service should insist that ranchers accept the risk that their herds will be subject to natural predators.**

##### **BY NOT DEMANDING THAT PREDATORS BE DESTROYED OR RELOCATED**

I think that if the government does lease out my forests to ranchers to graze their cattle on, there should be a clause in which they accept that because they are allowing their domesticated animals into the wilderness unsupervised, there will be consequences of their action. They will not demand that wolves, coyotes, cougars, bears, or any other natural predators that kill their livestock be terminated or relocated. They will accept these losses as part of the price for being allowed to graze their privately owned stock on public land. National Forests are meant to preserve our rare animals as well, and predators shouldn't be punished for doing what they were born to do. (Individual, San Diego, CA - #A4694.15160)

#### **1098. Public Concern: The Forest Service should analyze the impact of roadless designations on rangeland health and management.**

##### **IN THE NATIONAL GRASSLANDS**

The Forest Service should allow local and forest level decisionmaking for rangeland health in addition to forest health. This means that Roadless values should be analyzed as to their purpose and practicality as to range conditions on the national grasslands. It appears that many of the proposed Roadless areas on our national grasslands and national forests have been proposed without a thorough analysis of the impact on rangeland health and management. This analysis must include the impact of Roadless designations on adjacent private rangelands and their management. (Individual, Buffalo, WY - #A29885.60600)

#### **1099. Public Concern: The Forest Service should ensure that grazing rights do not automatically go to the same rancher every decade.**

If you want to make some changes, work on grazing rights. The fees for grazing rights should be competitive, and should NOT automatically go to the same rancher decade after decade. In many areas they should be curtailed, and eventually eliminated. (Individual, No Address - #A8932.65110)

## *Funding*

### **1100. Public Concern: The Forest Service should sell unneeded grazing land.**

#### **TO PEOPLE WHO HOLD LEASES**

Grazing land that is not needed should be sold to lease holders. So should forests if there are buyers. (Individual, Union City, MI - #A6855.30100)

## *Allow Grazing*

### **1101. Public Concern: The Forest Service should allow grazing in roadless areas.**

I would urge the Forest Service to keep under review the 58.5 million acres of roadless areas. My urging comes with a keen interest that current use of those roadless areas by ranching interests be considered a part of future use of roadless lands in National Forests. (Individual, Saint Ignatius, MT - #A7484.10110)

#### **TO PREVENT FUELS FROM ACCUMULATING**

Private properties and communities could benefit greatly by more grazing on forest grounds to keep fuels from building too heavily. (Individual, Ruby Valley, NV - #A15251.35000)

#### **BY INCLUDING SPECIFIC STATEMENTS TO THAT EFFECT IN THE ROADLESS AREA CONSERVATION RULE**

We note that in the Wilderness Acts, Congress specifically addressed grazing usage within the wilderness in order to clearly state that grazing was a permissible use within these areas. It stated that grazing was a permissible use within these areas. To avoid any confusion that grazing is a priority use within the roadless and unroaded areas, we suggest that similar statements be included in the proposed rule. (Elected Official, Roseburg, OR - #A11811.65110)

We note that in the Wilderness Acts, Congress specifically addressed grazing usage within the wilderness in order to clearly state that grazing was a permissible use within these areas. To avoid any confusion that grazing is a priority use within the roadless and unroaded areas, we suggest that similar statements be included in the proposed rules. (County Attorney, Grant County, OR - #A17667.90610)

#### **IN NORTH DAKOTA**

The Final EIS indicates in the response to comments volume (Volume 3), that local managers will have the option to disallow grazing and other uses in inventoried roadless and unroaded areas if deemed necessary to protect their roadless characteristics. Based on this, it is erroneous to assume that grazing will not be affected by the roadless designation.

This plan does not recognize the fact that North Dakota's National Grasslands consist of intermingled private, state and federal land. Seriously curtailing grazing on the federal portion of this system will put more pressure on the private lands. The result will be a negative impact on an ecosystem we have worked on improving for 70 years. (Elected Official, Watford City, ND - #A27737.65100)

### **1102. Public Concern: The Forest Service should protect access to livestock and range facilities.**

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 to animals, and to get trailers in to sick or injured stock. (Individual, West Point, UT - #A5415.90610)

Fencing around the units in the Manti Canyon is very critical. Fences keep the cattle in the units that they are allowed to graze in. Without fences, the cattle would be scattered all over the mountainside. The different fences surrounding the units consist of electric, barbed wire and log. With harsh winters and other elements, the fences need to be fixed every year before and during the grazing period. Roads are critical for access to get to the fence lines. It would be impossible to carry all the equipment, fencing

tools and other supplies by horse or foot. The use of vehicles and ATVs reduces the hours spent on fixing the fences and it also makes the work easier. Along with fencing, proper nutrition is needed for the cattle.

Salt is needed for proper healthy nutrition for the cattle. The salt also gives the cattle bloat protection. Salt is only able to be packed by horses when the amounts are small and it's a short distance to travel. Because the salt bags weigh 50 to 100 pounds each it is more economical and [less] time consuming to haul salt with a motorized vehicle. We wouldn't be able to provide the proper nutrition to those animals very economically with the roads closed. The salt licks are also used by the deer, elk, and even smaller animals. They are provided good nutrition from the salt licks. (Individual, Manti, UT - #A20336.90100)

## *Do Not Allow/Restrict Grazing*

### **1103. Public Concern: The Forest Service should regulate grazing in roadless areas.**

**Grazing.** I feel at times needs to be more regulated than it is, because I have seen areas of the forest which I felt were terribly overgrazed, even in wetter years. (Individual, Powell, WY - #A19223.65110)

#### **IN RIPARIAN AREAS AND RECREATIONAL CAMPSITES**

Cattle should not have any access to riparian zones, and, should be excluded from using recreational campsites. Preferably, all foraging in roadless areas would be reserved for only wildlife and big game species. (Individual, Geneva, NE - #A15512.90110)

### **1104. Public Concern: The Forest Service should not allow grazing on National Forest System lands.**

Grazing should be banned. (Individual, Chico, CA - #A1040.90000)

#### **BECAUSE OF ENVIRONMENTAL DAMAGE**

Keep cattle out of the areas in the Western states, because they are nothing but hooved locusts. They eat all of the best forage and leave very little nutritious forage for wildlife, plus they destroy the streams. (Individual, Ogden, UT - #A1166.90000)

I am opposed to allowing livestock to graze on national forest or other federally owned lands. The programs degrade the environment and do not generate enough money to pay for them. (Individual, Waco, TX - #A3956.90620)

### **1105. Public Concern: The Forest Service should restrict off-road vehicle use by ranchers on National Forest System lands.**

#### **FOR THE PURPOSE OF MONITORING LIVESTOCK**

What about the cattleman? Most of them nowadays ride ATVs to keep track of their cows to monitor where the cows are. Will they be forced to ride ATVs in the woods? Like most dirt bikes have torn up our trails that are slowly being closed to the public? (Individual, Forest Ranch, CA - #A5944.65140)

## **Utility Corridors**

### **Summary**

**General Comments** – One individual requests that the Forest Service consult with the Federal Energy Regulatory Commission and the Federal Communications Commission regarding the effects of the proposed regulation on public utilities that have rights-of-way (ROWs) which cross the National Forest System, or which may need to cross the NFS in the future. This person believes these corridors should be counted as existing roads.

**Utilities** – Those who assert that utility development should be allowed to continue write primarily about the need to maintain access to utilities. One individual believes that the Forest Service should allow power line construction in roadless areas. Several utility groups assert specifically that the Forest Service should allow them to have continued access to their facilities. To that end, individuals and city agencies ask the Forest Service to maintain existing roads in order to allow local governments access to their water systems.

Other respondents request that the Forest Service restrict or prohibit utility development in roadless areas. They suggest that the Agency prohibit power-lines and pipelines, wireless telecommunications facilities, and hydroelectric facilities; prohibit maintenance of existing dams; prohibit water extraction; and limit water withdrawal that threatens to lower the water table.

### *Utilities General*

#### **1106. Public Concern: The Forest Service should consult with the Federal Energy Regulatory Commission and the Federal Communications Commission regarding the effects of proposed regulation on public utilities.**

##### **TO ENSURE ACKNOWLEDGEMENT OF EXISTING RIGHTS-OF-WAY**

The Federal Energy Regulatory Commission (FERC), and the Federal Communications Commission (FCC), must be consulted regarding the effect of the proposed regulation on Public Utilities that have rights-of-way (ROWs) which cross the National Forest System, or which may need to cross the NFS in the future.

All utility rights-of-way, and proposed rights-of-way, must be acknowledged to be existing roads. These ROWs are vital to rural economies. The USDA has a mandate to improve rural economies, and this mandate applies to the USDA Forest Service as well. (Individual, Anchorage, AK - #A11831.91710)

### *Allow Utilities*

#### **1107. Public Concern: The Forest Service should allow power line construction in roadless areas.**

I don't think an occasional power line or other man made structure decreases my outdoor experience. (Individual, Palmer Lake, CO - #A23361.90100)

#### **1108. Public Concern: The Forest Service should allow access to power lines and hydroelectric facilities.**

##### **THROUGH THE CONSTRUCTION OF TEMPORARY ROADS**

Roadless area rules must allow for access to facilities within the forest that may not presently have defined roads, but for which periodic repair work may require the temporary establishment of an access road. For example, SCE owns numerous power lines that traverse forest lands and many hydroelectric facilities are located on forest property. These facilities may not require permanent roads. However, occasional access may necessitate the creation of a temporary road or pathway. (Organization, Rosemead, CA - #A22624.91110)

##### **FACILITIES CONTROLLED BY THE TENNESSEE VALLEY AUTHORITY**

The Tennessee Valley Authority has a significant number of electric transmission lines already erected on Forest Service lands in a number of National Forests in seven states that TVA serves. In order to maintain the easements, perform emergency repair and routine maintenance TVA needs to be able to

utilize existing access roads or as some roads are reclaimed by the Forest Service, extend limited lengths of new roads through the edge of some areas being considered for "Roadless Area" designation.

It would be in the Forest Service's local management interest and TVA's interest to be able to work together to meet the objectives and needs at the local forest level, yet preclude general public access and utilization of any road access agreed to by the two agencies. TVA has been working with the local forest managers to close some roads and to a limited extent assist in maintenance of others. In the mountainous, rolling, or wetlands of some of the forests there is no other way to maintain access to existing lines and structures. Failure to maintain the structures or lines would result in significant portions of the service area being uncertain of reliable power and jeopardize several interconnections on the national power grid. (Organization, Chattanooga, TN - #A3339.91710)

## **1109. Public Concern: The Forest Service should maintain existing roads.**

### **TO ALLOW LOCAL GOVERNMENTS ACCESS TO THEIR WATER SYSTEMS**

Roads are also necessary to repair and maintain city water supplies. (Individual, Fountain Green, UT - #A20620.51000)

In the West, much of our local watershed is in our national forests. It is imperative that roads be maintained, and access be allowed to these vital areas. Our very lives depend on it. (Individual, Manti, UT - #A29868.51000)

If a road were washed out on public lands, local governments would have unnecessary costs and red tape to follow to get a road repaired to access their water system. (Individual, Manti, UT - #A25532.91710)

### **RAYWOOD FLAT AREA**

The Raywood Flat and the Banning Canyon roads in the counties of Riverside and San Bernardino, California, are used to access and service an approximately 14 mile long water conveyance system that provides water to residents of Banning Bench and the City and also provides the hydro power for the Southern California Edison ("SCE") San Gorgonio #1 and #2 hydroelectric project. The system includes two diversion dams, two powerhouses, water tanks, and a long water flume conveyance system. Historical records indicate that the original flume was constructed of wood around 1877 to provide water to the early settlers in the region, and that the current concrete flume was constructed around 1910 to provide water and generate hydroelectric power. The system is referred to by the Federal Energy Regulatory Commission (FERC) as "Project 344," and SCE holds a FERC license to operate it for power generation.

Some 75 years ago, the State of California adjudicated the right of the Banning Heights Mutual Water Company ("BHMWC") and the City to divert and use the water that generates power for Project 344. The adjudicated right to divert water that BHMWC and the City hold to is very significant indeed: approximately 9,500 acre/feet per year from the whitewater River. Banning Bench, a community of some 600 residents served by BHMWC, has been almost entirely dependent on this water supply for nearly a century. Use of this water by the residents of the City (pop. 26,000) goes back at least that far. Moreover, for more than a century, the City, SCE, and BHMWC have used the roads in this area to operate, maintain and repair the flume system.

Designating Raywood Flat Area A and Area B as a Roadless Area, would seriously endanger BHMWC's and the City's water supply by not allowing for the road maintenance and repairs that are periodically needed in order to enable BHMWC, the City, and SCE to have access to Project 344. Including these areas in the Roadless Area designation would only lead to inevitable problems, as the Forest Service will most likely maintain that special permission is thereafter required to repair and maintain the existing roads, and the City will out of necessity, respond by asserting its various rights to this essential right-of-way as were granted by 19th Century Federal Law. The upshot will be costly and potentially cause long delays for essential repairs to the diversion dams and water conveyance system that our community depends on. (Manager, City of Banning, CA - #A20958.51210)

The Raywood Flat Road and Banning Canyon Road are shown on existing Forestry maps to be partially excluded from the proposed Roadless Area, but this is not enough. All of the roads along with the entire water conveyance system need to be excluded from the Roadless Area, starting from the Banning Heights Water Tank at Pine Powerhouse all the way up to the Diversion Dam at the East Fork of the Whitewater River. The best approach is simply not to include in the Roadless Area any of the Sections of land that contain any roads or improvements on them or provide access to portions of the water conveyance system.

Once put in place, it will be hard to work around a Roadless Area or to change that designation. Areas must not be made roadless where existing roads in those areas are regularly used to operate, maintain, and repair a water system that has been relied upon by our community for nearly a century. Ours is a growing city, and the importance of this water source for our community is only going to increase as that growth occurs. (Manager, City of Banning, CA - #A20958.45610)

This letter is sent to you to address the matter of the proposed Roadless designation in the Raywood Flat Area AandB (#61 and #62). The Raywood Flat Rd. and the Banning Canyon Rd. in Riverside and San Bernardino County California, helps service a hydroelectric project with 2 diversion dams, 2 power houses, water tanks, and long water conveyance system which provides water to Banning Heights Mutual Water Co. for the Banning Bench, a small community of approximately 500 residents.

Banning Heights and its predecessors have owned the water rights that serve as the basis for the Federal Energy Regulatory Commission (FERC) project for more than 80 years. The Banning Bench has been primarily dependent on this supply for their water. The hydro project has used the existing forestry roads in this area to maintain the entire system for at least 80 years. (Individual, Banning, CA - #A17655.91610)

#### **1110. Public Concern: The Forest Service should allow motorized vehicles in roadless areas.**

##### **TO MAINTAIN WATER SYSTEM STRUCTURES**

In other areas of national forests we are aware of many situations where access has been denied to municipalities and irrigation companies to maintain water system structures in wilderness and roadless areas even though water permits and roads were established long ago. These systems cannot be maintained without the use of motorized equipment and road access. (Professional Society, No Address - #A27584.65000)

#### ***Do Not Allow/Restrict Utilities***

#### **1111. Public Concern: The Forest Service should prohibit power-lines and pipelines in roadless areas.**

I guess roads are something that ought to be prohibited if we're going to call an area roadless. I'm not sure how far I'd go beyond that - perhaps I'd include power-lines and pipelines as prohibited—large, linear structures that have a function similar to roads (and often require roads for construction and servicing anyway). (Individual, Jackson, WY - #A10527.90110)

#### **1112. Public Concern: The Forest Service should prohibit the construction of wireless telecommunications facilities.**

The following activities should be expressly prohibited in existing roadless areas: logging (except where scientific evidence proves that it is essential to the health of the forest), mineral extraction, construction of power lines, and the construction of wireless telecommunications facilities. (Organization, Washington D.C. - #A22098.90110)

**1113. Public Concern: The Forest Service should prohibit hydroelectric facilities in roadless areas.**

Activities that should be prohibited include: construction roads, snowmobiles, operating personal watercraft (jet skis) and off-highway vehicles, harvesting timber commercially, mining, exploring for oil and gas, and developing hydroelectric facilities. (Individual, Eureka, MT - #A10594.90110)

**1114. Public Concern: The Forest Service should not allow maintenance of existing dams.**

There should be overarching federal guidelines that apply to all roadless areas, including . . . no maintenance of existing dams. (Individual, Dutch John, UT - #A25600.13130)

**1115. Public Concern: The Forest Service should prohibit water extraction from roadless areas.**

Water extraction from roadless areas should be prohibited. Water extraction from aquifers underlying roadless areas should be strictly limited. Use only the natural outflows from roadless areas. (Individual, Durham, NH - #A8746.90110)

**1116. Public Concern: The Forest Service should limit water withdrawal that threatens to lower the water table.**

. . . limit water withdrawals that threaten to lower the water table . . . (Individual, Cleveland, OH - #A26411.90000)

## Other Natural Resource Concerns

### Summary

Respondents offer various comments relating to management of natural resources which do not fall under the topics covered in the above sections. A few individuals ask the Forest Service to recognize the possible medicinal values available in forest products, while an agriculture association suggests that the Agency should recognize that the most effective use of grasslands is food production. Others suggest that certain activities be prohibited in roadless areas, including construction of commercial facilities, dumping of waste materials, nuclear testing and waste storage, and eco-terrorism.

**1117. Public Concern: The Forest Service should recognize the possible medicinal values available in forest products.**

Today, medicine has discovered that some of the best cures come from nature. Where will we be without cures for illnesses if our resources for curing them are gone? (Individual, Columbus, OH - #A4376.65290)

Social and economic values are immensely enhanced by and near such climax forests. . . . Such forests provide an immensely valuable scientific laboratory where discoveries of nature's processes lead to enhancements to civilization such as new medicines. (Individual, Salem, NH - #A8263.70000)

**1118. Public Concern: The Forest Service should revise the leasing process.****TO ALLOW MORE EQUITABLE EXPENSE SHARING**

The entire leasing process must be revised to allow more equitable expense sharing between private industry and US citizens. The USFS was not established as a welfare assistance program. (Individual, Kemmerer, WY - #A8383.17130)

**1119. Public Concern: The Forest Service should prohibit various activities in roadless areas.**

**CONSTRUCTION OF COMMERCIAL FACILITIES**

The following activities should be completely prohibited in roadless areas: . . . construction of commercial facilities such as lodges, ski resorts, guide stations, hotels, radio and television towers as well as cellular telephone broadcast facilities . . . (Individual, Port Angeles, WA - #A6179.90110)

**DUMPING OF WASTE MATERIALS**

Dumping of waste other than natural waste should be prohibited. (Individual, Lacey, WA - #A17762.90000)

I think pollution and anti-dumping laws of public lands should be strengthened and enforced. IRAs should above all else be clean. (Individual, Palmer Lake, CO - #A23361.90000)

**NUCLEAR TESTING, POWER GENERATION, AND ECO-TERRORISM**

Nuclear testing and power generation should not be done in IRAs.

Eco-terrorism should not be tolerated in IRAs. (Individual, Palmer Lake, CO - #A23361.90110)

**NUCLEAR WASTE STORAGE**

Activities prohibited: Nuclear waste storage. (Individual, No Address - #A28602.90110)

**1120. Public Concern: The Forest Service should recognize that the most effective use of grasslands is food production.**

As we view this plan, the most effective usage of the grasslands is food production. (Association, Watford City, ND - #A29131.65000)

## Recreation General

### Summary

**General Comments** – People offer a number of general comments regarding recreation management. Some respondents assert that the Forest Service should take its responsibility to provide recreation opportunities to the public more seriously. One Permit Holder states that, per the National Forest Management Act, the Agency has a statutory duty to provide outdoor recreation opportunities. Others assert that the Agency’s goal must be to provide the maximum amount of recreational opportunities, as long as they do not cause significant, irreversible harm to the environment. To that end, people urge the Forest Service to devote more attention to recreation planning and, in so doing, to consider various recreational values—such as non-wilderness, semi-primitive, motorized, and non-motorized values, and the value of dispersed recreation.

Some ask the Forest Service to allow management activities designed to reduce fuel loading and wildfire risk because of the impacts of fire on recreational opportunities. Others urge the Agency to forego implementation of the Roadless Area Conservation Rule because, they say, it does not adequately consider recreation, or because it will be overly restrictive toward recreation uses. Likewise, one Organization urges the Forest Service to manage for multiple use in order to promote recreational diversity. Another suggests that the Agency prepare a winter recreation use plan as part of the forest planning process in order to develop a system of land use allocations.

Respondents also comment on recreation management vis-à-vis wilderness management, particularly in relation to dispersed recreation. According to some, the Forest Service should manage roadless areas to reduce recreation pressures on designated wilderness areas—by providing non-motorized recreational opportunities, or by allowing a wider variety of activities, including motorized activities. On a similar note, some advocate opening non-wilderness areas, including roadless areas, to dispersed recreation.

**Adequacy of Analysis** – A few individuals suggest that the Forest Service should acquire data on the increasing recreational use of National Forest System lands and that it should, likewise, evaluate recreation potential in roadless areas. One individual adds that such evaluations must utilize accurate maps indicating cultural improvements, as well as topographic features on a small drainage-by-drainage basis. A business asks the Agency to evaluate seasonal suitability for various activities, including motorized and non-motorized recreation.

**Funding** – Some urge the Forest Service to request adequate funding for recreational programs, in particular so that these facilities can be maintained without visitor fees. Others suggest that money allocated for roads or for timber sales be used instead to fund recreational facilities.

**Recreation Access** – A number of respondents assert that the Forest Service should not restrict recreation access to National Forest System lands. Some say specifically that the Agency should ensure no net loss to public land and public access—that for every acre marked as ‘Closed,’ an equal acre be marked as ‘Open Access.’ Likewise, one Organization urges the Forest Service to ensure equal access among different user groups.

Some suggest that access be allotted according to use demands. For example, several propose allocating land acreage proportionally based on numbers of users for each activity. Others suggest granting proportional access among user groups based on their respective needs for

solitude; this would mean allocating more land area for non-motorized users, suggest some individuals. Finally, one individual requests that the Forest Service take into consideration the available opportunities for activities on other public lands when making allocation decisions.

Other respondents, however, maintain that there is currently sufficient access and that implementation of the Roadless Area Conservation Rule would have no effect on access. These comments appear in the previous section on travel management.

**User Conflicts** – The topic of user conflicts arises occasionally in comments directed to recreation management. Some respondents suggest that the Forest Service can alleviate the crowding that leads to conflicts by making more land available for recreation. Another individual asserts that crowding can be alleviated by implementing the Roadless Area Conservation Rule. This person remarks that these areas are already over-crowded by so many different users, and would appreciate the prohibition of a few uses, such as motorized vehicles.

Others believe the Forest Service can alleviate conflicts by designating separate areas for competing uses—such as for motorized and non-motorized uses, or for different types of motorized uses. Another individual suggests allowing activities according to the landscape’s ability to tolerate them, and then prioritizing uses according to the percentage of the public that participates in that activity.

### *Recreation Management General*

#### **1121. Public Concern: The Forest Service should take a leadership position in managing National Forest System lands.**

##### **BECAUSE IT HAS A STATUTORY DUTY TO PROVIDE OUTDOOR RECREATION OPPORTUNITIES TO THE PUBLIC UNDER THE NATIONAL FOREST MANAGEMENT ACT**

The agency needs to take a leadership position in managing the forests. The Forest Service has tremendous expertise in managing natural resources, and it has a duty to apply that expertise. In the past couple years, the agency has explored various roles for itself in forest management, including those of “convenor” or “facilitator.” From the ski industry’s perspective, it is crucial that the Forest Service take a leadership role in decision-making on the management of the forests, whether it be at a planning or site-specific project level. The agency is not merely a participant in the process, it has a statutory duty to provide outdoor recreation opportunities to the public under NFMA [National Forest Management Act], the Multiple-Use Sustained Yield Act, and the National Forest Ski Area Permit Act. We appreciate the difficult position that the agency is in and the fact that the results of its decision-making are not always popular. As we witness a tremendous increase in involvement from other agencies with little or no recreation experience in approval processes, however, the leadership of the Forest Service becomes paramount. (Permit Holder, No Address - #A5285.12120)

#### **1122. Public Concern: The Forest Service should acknowledge that its goal is to provide the maximum amount of recreational opportunities.**

##### **AS LONG AS THEY DO NOT CAUSE SIGNIFICANT, IRREVERSIBLE HARM**

Make it plain from the start that the goal of the Forest Service is to provide the maximum amount of recreational opportunities as long as they do not cause SIGNIFICANT IRREVERSIBLE HARM. Baseless emotional arguments will not be considered. An example being that it is often stated that deer, elk, and bears shy away from roads and need pristine wilderness to survive. Now we know that this is a baseless argument because too many deer, elk, and bears have ended up in unlucky motorists’ grilles, and the highest concentrations of these animals are not in the pristine wilderness areas, but instead in the bottoms near the roads. (Individual, Kalispell, MT - #A19138.15160)

**1123. Public Concern: The Forest Service should consider various recreational values.****NON-WILDERNESS, SEMI-PRIMITIVE, MOTORIZED, AND NON-MOTORIZED**

Non-wilderness, semi-primitive, motorized and non-motorized recreation values must be considered as important from an economic and social standpoint. Semi-primitive both motorized and non-motorized recreation adherents are typically non-communicative and seldom heard from. They do, however, represent a large percentage of forest users, thus should be provided for. (Individual, Manhattan, MT - #A21848.45100)

**THE VALUE OF DISPERSED RECREATION**

I find value in all of the roadless areas characteristics but what truly sets inventoried roadless areas apart from other specially managed lands is the opportunity for dispersed recreation. For me, this means an opportunity to enjoy the great outdoors with family and friends. Our roadless areas must be managed to preserve and promote dispersed recreation opportunities. (Individual, Lawrenceville, GA - #A6172.45100)

I find value in all of the roadless areas characteristics but what truly sets inventoried roadless areas apart from other specially means an opportunity to enjoy the great outdoors with family and friends. Our roadless areas must be managed to preserve and promote dispersed recreation opportunities. (Individual, Stinson Beach, CA - #A28654.45100)

**1124. Public Concern: The Forest Service should devote more attention to recreation planning.****ESPECIALLY IN THE TONGASS NATIONAL FOREST**

I believe that the Forest service needs to devote much more attention to recreation planning, especially in the Tongass. In the future we face a great danger of loving our forests (and associated waters) to death, and losing wilderness. This problem will require difficult policy decisions such as capacity analyses, allocations between private and commercially operated recreation visits, design and location of infrastructure, and prevention of 'theme parks' that diminish and obscure the lessons of naturally functioning ecosystems. (Individual, Sitka, AK - #A15506.90000)

**1125. Public Concern: The Forest Service should manage roadless areas for primitive recreation.**

We need wilderness as places of solitude in an over-crowded world. Only government can provide this unusual "service" by setting aside a relatively small portion of the public domain for "primitive" recreation. (Individual, Harrison Township, MI - #A8378.25300)

**1126. Public Concern: The Forest Service should manage to reduce fuel loading and wildfire risk.****BECAUSE OF ITS DEVASTATING IMPACTS ON RECREATIONAL OPPORTUNITIES**

Allow vegetative management activities that are designed to reduce fuel loading and wildfire intensities. Catastrophic wildfires can have significant environmental consequences as well as devastating effects on recreational opportunities. With this in mind, it is important that the agencies be encouraged and allowed to treat fuels to reduce the risk of wildfire within these designated areas. (Organization, Salt Lake City, UT - #A12009.30500)

**1127. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.****BECAUSE IT DOES NOT ADEQUATELY CONSIDER RECREATION**

Please accept my comments on the roadless initiative as proposed by the Clinton Administration. I object to just about all aspects of the initiative as presented as is currently being considered for implementation. The issue was railroaded through the public comment process, our comments were discouraged, belittled or ignored. The inventory of roadless areas includes many areas that include roads and ORV [Off Road Vehicle] trails, yet are inventoried as "roadless." The whole plan is nothing more than an attempt to lock up more public land. If it truly was an attempt to better manage the public land, serious consideration would have been given to recreation that includes ORVs and mountain bikes. These forms of recreation would have been addressed not just mentioned. (Individual, Everett, WA - #A744.12220)

**BECAUSE IT WILL BE OVERLY RESTRICTIVE TOWARD RECREATION USES**

I am writing to support the decision the Forest Service's Roadless Area Conservation Rule. The roadless initiative put forth by the Clinton administration is overly restrictive toward recreation uses and doesn't represent the interests of the people who actually go to the National Forests. (Individual, Fort Collins, CO - #A970.10130)

Please STOP the Forest Service's Roadless Area Conservation Rule as published in the Federal Register on January 12, 2001. Allowing the Roadless Area Conservation Rule to stand would cause irreparable harm to the millions of people who depend on our forests for resources and recreation. (Individual, Albuquerque, NM - #A10497.10130)

As an ORV person, I'm 180 [degrees] away from the citizen who wants Forest land totally closed to humans. I think that's unrealistic and unfair.

I think there's enough land to go around for all users, or non-users, to use and enjoy. Whether it's ORV parks (snow mobiles included), hiking trails, whatever, the users (sometimes in organized clubs) are currently responsible for the area's upkeep. Let's keep it that way. (Individual, Asheville, NC - #A15196.10130)

**1128. Public Concern: The Forest Service should manage roadless areas to reduce recreation pressures on designated wilderness areas.****BY PROVIDING NON-MOTORIZED RECREATIONAL OPPORTUNITIES**

As a wilderness manager, I know that the designated wilderness areas are being "loved to death." Though the surveys all show that roughly 85 percent of those who come to public lands are seeking peaceful (non-motorized) contact with nature related outdoor recreation experiences, they too often find that the 75 percent of the public land which is not protected as wilderness is invaded by the ugly technological externalities of noise, speed, fumes, roads, dust . . . etc. The small percentage who wish to use public lands for motorized recreation are increasingly dominating the non-wilderness portions of America's public lands, rendering them useless as sanctuaries for the many citizens who desperately need a vacation away from city noises. The result is that far too many citizens must seek peace and solitude in designated wilderness! This should not be! (Individual, Murphys, CA - #A15706.25350)

**BY PROVIDING FOR A WIDER VARIETY OF ACTIVITIES, INCLUDING MOTORIZED**

Managing roadless units as roadless can be an exciting challenge, providing a tremendous variety of opportunities not available in wilderness. You can harden sites to accommodate uses. You can prescribe fire for hazard reduction or wildlife habitat improvement. You can build trails specifically designated to accommodate a variety of uses, from 4-wheelers to rock climbers. You can provide permanent improvement such as corrals or hitch racks for pack and saddle stock. You can spray herbicides for weed control or insecticides for control of insect outbreaks. Creative management of roadless lands can reduce

recreation pressures on our true wilderness units by providing attractive alternatives. The possibilities are limitless. (Organization, No Address - #A8227.25360)

### **1129. Public Concern: The Forest Service should manage for multiple use.**

#### **TO PROMOTE RECREATIONAL DIVERSITY**

Multiple-use management goals are the only goals that will “best meet the needs” of the public and provide for equal program delivery to all citizens including motorized visitors. All of us have a responsibility to accept and promote diversity of recreation on our public lands. Diversity of recreation opportunities can only be accomplished through management for multiple-uses and reasonable coexistence among visitors. (Organization, Helena, MT - #A20619.50200)

### **1130. Public Concern: The Forest Service should open non-wilderness areas to dispersed recreation.**

Some of our public land should be managed as Wilderness, but certainly not all of our roadless areas. Areas not yet designated by Congress, should be open to dispersed recreation, including significant portions for motorized recreation. Roadless area conservation will protect the same characteristics that make these areas special and worthy of Wilderness consideration but it will do so without eliminating access. (Individual, Canyon Lake, TX - #A3666.25220)

#### **INCLUDING ROADLESS AREAS**

I find value in all of the roadless areas characteristics but what truly sets inventoried roadless areas apart from other specially managed lands is the opportunity for dispersed recreation. For me, this means an opportunity to enjoy the great outdoors with family and friends. Our roadless areas must be managed to preserve and promote dispersed recreation opportunities. The demand for motorized and other dispersed recreation is growing. At the same time, the supply of roadless lands available for multiple-use activities continues to decline because of special designation and development. Clearly, there is a need for lands managed as roadless to provide dispersed recreation opportunities. (Individual, Victoria, KS - #A2874.91110)

I am pleased that the Roadless Area Conservation Rule recognizes the special values associated with roadless areas for both motorized and non-motorized recreationists. I agree with the Forest Service that dispersed recreation opportunities are among the characteristics of roadless areas and that they should be protected for future generations; and I am opposed to any action that might weaken this protection. (Individual, Canyon Lake, TX - #A3666.91110)

### **1131. Public Concern: The Forest Service should encourage recreational development of private lands.**

#### **TO ENHANCE RECREATION OPPORTUNITIES ON PUBLIC LANDS**

They should have a reasonable right to access their lands and they should be able to manage their lands as necessary. In some cases, development of private land may serve to enhance the recreation experiences on the public lands. The agencies should be encouraged to work collaboratively with private landowners in the planning for these designated areas. (Organization, Salt Lake City, UT - #A12009.40000)

### **1132. Public Concern: The Forest Service should emulate the Ten Lakes Roadless Area management.**

The Ten Lakes Roadless Area (designation in S-393) is an example of roadless management to be emulated. Snowmobiling is prevalent with no effect on soil and water. Cross-country skiing is permitted. With hardened trails and minimal shelters it could become a unique use recreation area. (Association, Eureka, MT - #A17718.91110)

**1133. Public Concern: The Forest Service should prepare a Winter Recreation Use Plan as part of the forest planning process.****TO DEVELOP A SYSTEM OF LAND USE ALLOCATIONS**

We have a suggestion to help the Forest Service shape the future of managing roadless areas and alleviating some of the tension that is occurring between various winter recreation activists such as snow cat skiing, snowmobiling and backcountry skiing. This is that the Forest Service prepare a Winter Recreation Use Plan as part of the forest planning process. The primary approach for this plan should be a system of land allocation whereby areas are established and managed for each of these uses. That is, separate areas for motorized and non-motorized users, snow cat skiing and snowmobiling etc. The roadless area protection presents an opportunity to do this as some roadless areas have low value for Wilderness designation and could be set aside for these other uses. (Permit Holder, McCall, ID - #A15317.91210)

***Adequacy of Analysis*****1134. Public Concern: The Forest Service should acquire data on the increasing recreational use of National Forest System lands.**

The Forest Service must have data on the increasing recreational use of the lands it manages. The demand for recreational lands is virtually exploding. In the Chattahoochee National Forest, cars are parked at trailheads every day of the year. On weekends, it's hard to find a parking space. On the Nantahala River in North Carolina, every pull-out along the river has one or two cars parked in it. Even the western national forests are seeing increased use. I have visited and hiked and fished in several western national forests, and I always see people, even in the most remote areas. These data on recreational use should be used and considered in all Forest Service decision-making processes. (Individual, Conyers, GA - #A13536.90000)

**1135. Public Concern: The Forest Service should evaluate recreation potential in roadless areas.****BY USING ACCURATE MAPS**

Recreation potential evaluation must utilize accurate maps indicating cultural improvements as well as topographic features on a small drainage-by-drainage basis. The existing forest planning procedure is quite capable of this necessarily intensive inventory and analysis. (Individual, Evergreen, CO - #A19178.90000)

**1136. Public Concern: The Forest Service should provide an evaluation of seasonal suitability for various activities.****INCLUDING MOTORIZED AND NON-MOTORIZED RECREATION**

This list might include: An evaluation of seasonal suitability for various activities, including motorized and non-motorized recreation. (Business, Lewiston, ID - #A7991.90000)

***Funding*****1137. Public Concern: The Forest Service should request adequate funding for recreational programs.**

Please ask for funds to adequately support the Forest Service recreation and trail programs. For many years the Forest Service has said they support recreation but they have NOT asked for the appropriated monies to do so. "ON the ground monies" have decreased for the last 3 years, while money for various plans have increased! Please ASK for more money for field level staff and projects. (Individual, Los Altos, CA - #A27264.17100)

**IN ORDER TO MAINTAIN RECREATIONAL FACILITIES WITHOUT VISITOR FEES**

I also urge your support for increasing the Forest Service recreation budgets, and to maintain our National Forests and campgrounds without visitor fees. (Elected Official, Salem, OR - #A23671.90000)

**1138. Public Concern: The Forest Service should use money allocated for roads to fund recreational facilities.**

By keeping the current roadless rule, it is also my hope that this will make more funds available nationally to improve hiking trails and to maintain existing roads on forest lands for the motorized public. The lack of funds to maintain the existing infrastructure on public lands has reached a crisis point. In our area, the Forest Service is unable to keep up with the needs of the recreating public. Campgrounds are full, parking lots are inadequate at trailheads, and trails and roads are not being maintained. In my opinion, recreation has become the national agenda for the Forest Service, not building roads that subsidize the logging industry. (Elected Official, Hailey, ID - #A4888.91110)

**1139. Public Concern: The Forest Service should use funds from timber sales to build new recreational facilities.**

I suggest that timber sales be used to generate the funds to build new campgrounds and new access roads to trailheads or picnic areas.

If more such trailheads were created, it would help disperse the crowds. The forest service needs to be partnering with the lumber industry to expand the recreation opportunities. (Individual, Bozeman, MT - #A59.17130)

**Recreation Access****1140. Public Concern: The Forest Service should not restrict recreation access to National Forest System lands.**

As the USFS evaluates roadless areas it should consider the public's right to access and recreate on public land . . . if the and is lock up then some jobs will be lost in policing/maintenance/upkeep and new road building, just to name a few. (Individual, Ogden, UT - #A590.90110)

The public should have access to public lands. Access to public lands should be guaranteed. (Individual, No Address - #A931.91110)

There are too few areas where people can camp, hike, fish, hunt, or just get away from other people and enjoy solitude. We need more access to wilderness areas where reservations are not required months in advance, or by permit only. It is getting to the point now where you can achieve the same outdoor experience in your suburban backyard, as you can in the public parks and campgrounds. (Individual, Renton, WA - #A3967.91110)

**BY ENSURING NO NET LOSS TO PUBLIC LAND AND PUBLIC ACCESS**

I'm seriously opposed to removing millions of areas of land from public use by randomly calling a road a "non-road" and refusing to maintain or clear perfectly good roads and these other bogus political moves.

We need NO NET LOSS to public land. No NET LOSS to access! If anything, there should be an INCREASE in public land and access to provide quality experiences to a growing population. (Individual, Cincinnati, OH - #A4027.90100)

I strongly ask that a full revision of the rule and ask that for every acre marked as 'Closed,' an equal acre be marked as 'Open Access.' (Individual, Healdsburg, CA - #A6217.10120)

**1141. Public Concern: The Forest Service should allow access to roadless areas by local citizens.****AS THE ONLY EXCEPTION TO ACCESS RESTRICTIONS**

The ONLY exemption [to restrictions on access to roadless areas] that I believe could be considered would be to provide LIMITED access if local populations were not able to otherwise enjoy their own wilderness areas. This access should strictly forbid any possibility of allowing any vehicles off the access area into the wilderness . . . not just snowmobiles and all wheel terrain vehicles. I do believe citizens in local areas should have the ability to enjoy their wilderness . . . but it MUST remain a wilderness . . . for them and their children's enjoyment, for the health of the environment, and for the life of the animals that live there. (Individual, College Park, MD - #A4380.90100)

**1142. Public Concern: The Forest Service should ensure equal access among different user groups.**

Management of our National Forest to maximize wild game populations at the expense of other uses does not meet the requirements of multiple-use laws and policies. We support hunting but why is hunting's impact on wildlife acceptable and non-destructive viewing by motorized visitors not acceptable? We are concerned that the areas of the National Forest which were designated for multiple-use management are not being managed for multiple-use. The document should carefully evaluate if the objectives of multiple-use laws and policies are being met by the proposed action. National Forest management decisions must not tend to eliminate access and recreation opportunity for one class of forest visitor and favor access and opportunity for another class of forest visitor. Past travel plan and rulemaking actions have effectively done this. The goal of public land management must be to require sharing of our resources with all users and uses. The document must evaluate the cumulative effects of travel plan and other forest actions on multiple-use and motorized visitors. (Organization, Helena, MT - #A13226.50200)

**1143. Public Concern: The Forest Service should allocate land acreage proportionally based on numbers of users for each activity.**

We have wilderness areas. We have roadless areas. We have remotely roaded areas. We have moderately roaded areas. We have heavily roaded areas. We have a variety of road types, from paved to native substrate. On top of all this we have a multitude of uses. There should be something out there for everybody. Lets not just manage the entire forest for the majority. Lets manage the majority of the forest for the majority of the people and the minority of the forest for the minority of the people. (Individual, No Address - #A27068.15165)

**BALANCED WITH A NEED AND COST/BENEFIT ANALYSIS**

The Forest Service must take an inventory of the desired uses and determine the reasonable division of resources needed to meet those uses to a satisfactory degree. Final decisions should be based upon: the level of demand for certain uses, the amount and type of land required for meeting that demand, the relative societal costs and benefits of each type of use, and the ability of other land ownerships to meet the demands within a specific region. (Association, Minneapolis, MN - #A19249.13230)

**1144. Public Concern: The Forest Service should grant proportional access among user groups based on need for solitude.****ALLOCATE MORE LAND AREA FOR NON-MOTORIZED USERS**

Generally, solitude and quiet are two of the highest values sought by non-motorized recreationists and those desiring wilderness, primitive, and semi-primitive experiences. On the other hand, solitude and quiet are generally lower on the list of experiences desired by those seeking more developed-type recreation experiences and by motorized users, usually falling below social experiences with his/her companions and thrill-seeking. Therefore, the seekers of wilderness, primitive and semi-primitive recreation experiences require larger, more dispersed areas than do motorized recreationists, even though

the motorized recreationist can cover many times more ground in a day than can his non-motorized counterpart. (Individual, Dillon, MT - #A28767.70320)

Another misconception is the idea that people are being excluded from public lands if they can't drive to their destination. On the Medicine Bow National Forest, there are nearly no areas left which are more than 1/2 mile from a road. I would say that those of us that want quiet, non-motorized access are the ones that have been excluded! (Individual, No Address - #A27082.75800)

**1145. Public Concern: The Forest Service should take into consideration the available opportunities for activities on other public lands when making allocation decisions.**

Can't we categorize the outdoor activities, for example: Conservation/no human use, hiking, fishing, hunting, ATV, automobile four wheel drive, etc., and set aside ideal locations that suit each specific activity. Each federal forest would need to be analyzed on a state-to-state basis. For example being from Wisconsin there are plenty of state fishing lakes available so none of the federal land would need to be set aside for fishing in Wisconsin. I fail to see why this has to be an all or none situation. Compromise and do what's right for all Americans. (Individual, Burlington, WI - #A14172.15111)

*User Conflicts*

**1146. Public Concern: The Forest Service should designate separate areas for competing uses.**

**TO MINIMIZE USER CONFLICTS**

We have to share, and we have to be smart about our environment. I believe that we also have to be considerate of others who don't take the same approach to enjoying our forests; however, I also believe that the majority should rule when it comes to recreation. Designating areas for specific activities, with areas based on percentage of use, is a good way to keep opposing enthusiasts apart. For example, I'm finding that it keeps snowmobilers and cross-country skiers satisfied for the most part in places like Mt. St. Helens and Newberry Caulderra. Only when the skier ventures onto the snowmobilers' trails, which they are allowed to do, is there a problem. The only way to manage this is on a local level. (Individual, Eagle Creek, OR - #A29956.15160)

If you close all the unofficial routes, and define an area as "roadless" even though it really isn't, you will stir up a hornet's nest. If you work with OHV groups and leave them a place to play, you will be able to save the places that really should be saved with a minimum of conflict. I think there is room for everyone. (Individual, Sandia Park, NM - #A26171.15160)

The citizens of the United States own the Forest and should be able to enjoy them. There could be areas where certain activities could be designated so different groups could utilize the forest without competing with each other.

Designate areas so the competing groups can all have an area to enjoy. (Individual, No Address - #A457.25300)

**FOR NON-MOTORIZED AND MOTORIZED USES**

First, it is important to say that I am a backpacker AND a motorcyclist. However, on the issue of use of the forest, I must strongly suggest that the two uses (hiking and off-road vehicle use) cannot co-exist. They simply must be separated by significant distances to assure a true outdoor, wilderness experience for the non-motorized. The noise of motors carries many miles in the outdoors. I do not go into the woods to hear what I can hear from an office parking lot or mall alongside a freeway. If the uses are not kept separate, I simply lose my right to enjoy many miles of our national forests. There has long been

the concept that the rights of some end where they encroach on the rights of others. That concept must be applied here.

Please notice that I am not suggesting there cannot be two uses; however, those who suggest co-use plans simply are deaf or riding noisy machines. In many places, the use of 4-8 mile buffer zones (noise can carry that far) may not be practical. In those cases, the whole area must be given up to motorized traffic or that traffic must be banned; there is no other real choice. In areas where there are no roads, we do not need roads; these are the last few, precious gems of our national heritage. Do not give them away to those who pass through so quickly, they don't see more than a freeway rider anywhere in the country. (Individual, Richmond, KY - #A4606.91221)

#### **FOR DIFFERENT MOTORIZED USES**

The AMA promotes the development and maintenance of multiple use trails. These trails provide the widest variety of recreational opportunities. However, in some cases it may be prudent to restrict trail/area access to specific types of OHVs. For example, a relatively low powered single track OHV may be less disruptive, and therefore require less route maintenance, than larger more powerful two track vehicles. (Organization, Pickerington, OH - #A3645.90420)

#### **THAT ALLOW MOTORIZED USERS TO VIEW NON-MOTORIZED AREAS**

Align non-motorized area boundaries so that they do not encroach or eliminate trails located at the edge of the boundaries. Provide for motorized trails and vista points on the boundaries outside of the non-motorized areas so the motorized visitors can view those areas. (Organization, Helena, MT - #A13226.91110)

#### **BY ADJUSTING ROADLESS AREA BOUNDARY LINES**

I find the WI roadless areas to have small 'core' areas due to the fact that 95% of Roadless areas is surrounded by roads and by the fact that most of the roadless areas are very small and even smaller by Western standards. Small adjacent roadless areas divided by town roads is not Wilderness. Selecting a USFS tract of land by road density does not allow up front weighting for other resource characteristics. In Wisconsin, winter snowmobile Trail use on the 1984 RARE II roadless lands is real significant, but is not fairly considered under current USFS Roadless.

Just moving a roadless boundary 1000 ft from a Class A road to the edge of a winter snowmobile trail would offer conflict resolution! Trying to keep a snowmobile trail between Wilderness and Wild Rivers is a challenge that few planners want to solve.

As you know, Snowmobiling lasts about 100 days per year in Northern Wisconsin on all USFS lands. The season is enjoyably repeated year after year by 600 Wisconsin Snowmobile Clubs and other sledders.

Wisconsin does not need a whole lot of 2nd rate Wilderness based upon the current carryover Roadless inventory land selection. (Individual, Thiensville, WI - #A28617.45611)

### **1147. Public Concern: The Forest Service should not confuse use conflicts with user conflicts.**

There is a huge distinction between the "use conflict" addressed in the Nixon and Carter executive orders and the "user conflict" wording in the administrative guidebook. I have Sierra Club documents that encourage "citizens" to actively promote "user conflict" (in quotes, no less) in order to browbeat land managers into closing an area to motorized recreation. That's garbage.

Genuine use conflict occurs when physically-incompatible activities—for example, mining and grazing, or logging and downhill skiing—are simultaneously desired on the same parcel. But skiers having a hissy fit because there's an active timber sale or mining operation within the viewshed is merely a conflict generated because a "user" has a bad attitude. Where is the spirit of multiple use and reasonable compromise for these whiners? It's nonexistent—they don't care if anyone else is happy or angry, so why accommodate them at all? Two way street, dudes. (Individual, Whitefish, MT - #A13242.15161)

### **1148. Public Concern: The Forest Service should allow activities according to the landscape's ability to tolerate them.**

Different landscapes are equipped to handle different activities. I think that all users must be prioritized by the percentage of the American public that participates in that activity. For example, I'm sure more people hiked in the National Parks last year than snowmobiled. If the activity is hindering an ecosystem's ability to manage itself, such as the snowmobiling in Yellowstone is resulting in de facto bison population control, then that activity should be prohibited. Specific activities should not be allowed that disrupt those functions that make an ecosystem function properly. Some systems are perfect only for hiking, where others can tolerate a much wider use of visitor activities like camping, bicycling, and rappelling. But again, if an activity is found to damage the system, it should be prohibited. If that activity ends up being prohibited on all public lands, so be it. We cannot allow our public lands to be damaged by special interest groups. These lands belong to everyone, including generations to come. (Individual, No Address - #A29243.90000)

### **1149. Public Concern: The Forest Service should alleviate crowding.**

#### **BY MAKING MORE LAND AVAILABLE FOR RECREATION**

The population of the United States is continuing to increase. This places additional pressures on the public lands available for recreation in local parks, state parks, national parks and the national forests. In many areas public lands are being so over utilized that it is degrading the quality of the recreational experience for visitors and causing those in charge of managing the facilities to consider limiting access. This is not in the best interest of the American public or the recreational lands currently in use. The Forest Service should be playing a key role in assuring that there are sufficient public lands available to the public to ensure that the recreational needs appropriate to the National Forests are met, now and in the future. Limiting the public access to millions of acres of public lands will only place an additional burden on the land that is currently accessible, and potentially deny access to some in the future if access quotas are deemed necessary.

As the demand for public access to public lands continues to increase, which it will continue to do as the U.S. population continues to increase, the Forest Service should plan for increased public use of Forest Service land, and how to best provide for the additional public access necessary to prevent additional damage from over use to the areas already utilized. More people will be coming for recreational opportunities in the national forests. That fact is inevitable. The Forest Service should be planning for that and making the land available to the U.S. citizens who are the true owners of the property. (Individual, Crystal River, FL - #A6257.91110)

As a Westerner, a rancher, and an avid public lands user—I have a concern. All the campgrounds are full, the trails are crowded, hunting season is a 3-Ring Circus. We have an increasing population and yet our recreational opportunities (public land) have not increased (at least not as fast). Used to be you could drive to wild areas for a family picnic. Now all the roads are more used and the land they access is more abused. The only way to get to pristine land is to hike and all the trails are crowded with others trying to find pristine wilderness. The congestion is itself destroying the land's pristine quality.

So two things, I believe, need to be done:

1 Keep Roadless areas—Roadless!

2 Provide more land to a burgeoning population! (Individual, Pritchett, CO - #A15216.10111)

#### **BY IMPLEMENTING THE ROADLESS AREA CONSERVATION RULE**

I'm writing to ask you to please keep the Roadless Area Conservation Rule just as it is. We need the Federal protection for the last beautiful, pristine areas of our public lands, and there are so few roadless areas left as it is. Everywhere I go in the mountains I find miles and miles of roads and ATV/motorcycle trails before I can get to quieter trails which don't allow motorized travel. There are now so many people who seek out and visit these places of solitude for good fishing, hunting, spectacular hiking, backpacking and climbing, that already many of these areas seem pretty crowded. (Individual, Bozeman, MT - #A8756.10150)

## Motorized Recreation

### Summary

**General Comments** – General comments on motorized recreation focus on the appropriate use of motorized vehicles and the adequacy of signs. According to some individuals, the Forest Service should require local forest managers to determine the appropriate use of motorized vehicles based on science rather than socio-economic factors. Some suggest the Agency implement rules on proper and responsible motorized use. One Organization requests that the Forest Service create a standard signing convention to avoid user confusion regarding seasonal motor vehicle restrictions.

**Adequacy of Analysis** – Several Organizations ask the Forest Service to more adequately analyze recreation management specifically with respect to motorized recreation. One group requests that the Agency evaluate the type of motorized experiences desired by users, commenting that environmental documentation must evaluate the type and quality of experiences that motorized visitors enjoy and want maintained in the area. Others assert that the Agency has not given adequate attention to the growing demand for motorized recreation opportunities, and so suggest evaluating the available mileage of off-road vehicle trails versus the available mileage of non-motorized trails and cross-country opportunities. Likewise, one individual requests that the Agency address the current level of motorized recreation on classified and unclassified roads within roadless areas in order to assess the costs of closing these areas and concentrating use in other areas.

**Education** – Some individuals suggest that the Forest Service educate the public about responsible motorized recreation. They believe that education is key to the success of this type of recreation and point out that people have to be educated to drive a car, why not require the same type of program for off road vehicles, snowmobiles, water crafts, etc.

**Cumulative Impacts on Motorized Recreationists** – Some respondents assert that the Forest Service should address the cumulative impacts of the Roadless Area Conservation Rule and other management proposals on motorized recreationists. According to one organization, it would be fair to analyze all impacts of all recreational activities, nonmotorized and motorized alike and then do a cumulative impact assessment before making decisions on what will be allowed and what won't be allowed. Other respondents suggest that the impacts to be evaluated include the impacts of all past motorized closures and road and trail obliterations; impacts of motorized closures as a result of wildfire; and impacts associated with environmental justice.

Suggestions for alleviating these impacts include developing a management alternative which incorporates all existing motorized roads and trails and restricts motorized travel to those travelways; closing certain areas to prevent user-created trails while allowing use of existing motorized routes; and reclassifying roadways to restricted-width or unrestricted-width motorized trails to provide motorized recreation opportunities, and then removing these roads from the roads inventory.

**Motorized Recreation** –A number of respondents urge the Forest Service to allow motorized recreation. One Organization suggests that in order to preserve motorized access, the Forest Service should develop a comprehensive inventory of all existing motorized routes. Some suggest the Agency should designate land specifically for motorized and mechanized access in areas where environmental damage will be minimal. Others suggest that the Forest Service

specifically allow motorized vehicles in roadless areas—motorcycles, six- or eight-wheeled vehicles, and battery-operated vehicles for the handicapped. One individual points out that there is a substantial number of citizens who enjoy this type of recreation, and while setting aside wilderness areas is appropriate, the Agency must take into account the number of people that would like to have equal opportunity to enjoy the rest of the national forests. One respondent suggests the Forest Service enhance opportunities for motorized recreation by including “roads and trails systems with loops, destinations such as lakes, mines, scenic overlooks, and interconnections to other forests and regional trails.” Finally, some suggest that the Forest Service should not use disturbance of wildlife as a reason to deny motorized access, since studies have shown that hikers disturb wildlife more than motorized visitors. A few individuals urge the Forest Service to allow airplanes in roadless areas by maintaining primitive backcountry airstrips and airstrips at ranger stations.

Other respondents believe that motorized recreation should be restricted or prohibited, particularly in roadless areas. One individual lists reasons such as air pollution, noise pollution, and environmentally destructive. These respondents assert that this type of recreation ruins the wilderness experience for everyone. People suggest specifically prohibiting two-cycle engines, gasoline, diesel, and alcohol engines, and vehicles that require more than a single track. Respondents say these prohibitions are necessary to eliminate user created trails and to alleviate the vandalism and crime, animal harassment, and increased wildfire danger which, they claim, follow from motorized activity. A few individuals also suggest prohibiting helicopters, airplanes, and powerboats in roadless areas.

### *Motorized Recreation General*

#### **1150. Public Concern: The Forest Service should require local forest managers to determine the appropriate use of motorized vehicles.**

##### **BASED ON SCIENCE RATHER THAN SOCIO-ECONOMIC FACTORS**

Absolutely no motorized vehicles, I don't care to have local managers decide this and other activities based on “socio-economic” factors, rather on science. (Individual, Missoula, MT - #A4935.91221)

#### **1151. Public Concern: The Forest Service should implement rules on proper and responsible motorized use.**

##### **TO ALLOW ACCESS TO PRIVATE AND PUBLIC LANDS**

Rules on proper and responsible motorized vehicles on Forest Service lands should be implemented to allow access to private and public properties within inventoried roadless areas. (Individual, Ephraim, UT - #A11576.91211)

#### **1152. Public Concern: The Forest Service should create a standard signing convention.**

##### **TO AVOID CONFUSION REGARDING SEASONAL MOTOR VEHICLE RESTRICTIONS**

There needs to a standard signing convention that is easier to understand. For example, there are often misunderstandings about seasonal motor vehicle restrictions due to the “No” symbol with the actual closure period shown below in small text that is often not seen or understood. In this case, the road or trail is open except during the period shown below but it is often misinterpreted as closed. (Organization, Helena, MT - #A13226.15163)

## *Adequacy of Analysis*

### **1153. Public Concern: The Forest Service should evaluate the type of motorized experiences desired by users.**

The motorized roads and trails that would be closed under the Roadless Rule are, for the most part, primitive roads and trails that provide the ideal experience sought by motorized visitors. The environmental document must adequately evaluate the type and quality of experiences that motorized visitors enjoy and want maintained in the area. (Organization, Helena, MT - #A13226.91211)

### **1154. Public Concern: The Forest Service should evaluate the available mileage of off-road vehicle trails versus the available mileage of non-motorized trails and cross-country opportunities.**

The document and decision must adequately address the need for motorized access and recreation in the National Forest and adequately allow for mitigation necessary to offset the trend of past closures. The cumulative effect of this trend has created an allocation of recreation opportunities in the National Forest strongly in favor of non-motorized interests. The process must evaluate and identify how many miles of OHV trails are available to motorized recreationists in the National Forest versus the miles of trails and cross-country travel opportunities available to non-motorized visitors. (Organization, Great Falls, MT - #A15315.45500)

Identify and compare the acreage available for use by motorized vs. non-motorized visitors. For example, this comparison should report the area available for motorized visitors as the number of feet of trails times a width of 4 feet divided by 43,560 square feet per acre versus all of the acreage in the national forest available to non-motorized visitors. (Organization, Helena, MT - #A13226.15168)

### **1155. Public Concern: The Forest Service should address the current level of motorized recreation on classified and unclassified roads within roadless areas.**

#### **IN ORDER TO ASSESS THE COSTS OF CLOSING THESE AREAS AND CONCENTRATING USE IN OTHER AREAS**

The reevaluation must clearly show the current level of motorized recreation on classified and unclassified roads within the so-called roadless areas. The costs of closing these areas and concentrating use in other areas must be addressed. (Individual, Alturas, CA - #A28581.45500)

### **1156. Public Concern: The Forest Service should include accurate emissions readings in EISs.**

Use fair guidelines in the EIS and require accurate emissions readings to be included in the EIS. (Individual, Lennon, MI - #A5999.15169)

## *Education*

### **1157. Public Concern: The Forest Service should educate the public.**

#### **ABOUT RESPONSIBLE MOTORIZED RECREATION**

Education is key to the success of every program. We must communicate to everyone the need for people to stay on roads and trails. How to ride safely. How to respect others and the environment. We give driver's education to all those who wish to drive a car, but we do not mandate any education for four-wheelers, snowmobiles, water crafts or mountain accessible vehicles. Maybe it could be part of the syllabus taught in schools. (Individual, Spring City, UT - #A25950.15163)

## *Cumulative Impacts on Motorized Recreationists*

### **1158. Public Concern: The Forest Service should evaluate the cumulative impacts to motorized users of reduced motorized access.**

Motorized recreationists gave up cross-country travel opportunities as part of the Three-State OHV Record of Decision. This lost opportunity included instances such as retrieval of big game and trail bike riding where cross-country travel was generally acceptable. If the concern over the creation of motorized trails by cross-country travel is environmentally unacceptable, then it should also be applied equally to cross-country hiking and mountain climbing. Cross-country hiking and mountain climbing also create trails that provide visible evidence on the landscape of mankind's existence. For that matter, non-motorized trails and motorized trails are often equal in visual and resource impact. Why are non-motorized trails acceptable and motorized trails not acceptable? This position is commonly used to eliminate motorized recreation opportunities and demonstrates that the impacts of non-motorized recreation opportunities are not evaluated with the same criteria used to justify elimination of motorized recreation opportunities. The document must evaluate the cumulative impact associated with the loss of motorized cross-country travel opportunities. The formulation of alternatives must include new motorized recreation opportunities to mitigate the loss of motorized cross-country recreation opportunities. (Organization, Helena, MT - #A13226.91211)

The loss of motorized recreation and access opportunities due to area closure with motorized travel restricted to designated routes compared to existing conditions must be adequately addressed in the document and factored into the decision. The proposed area closure action without closing of any existing roads and trails is a significant loss of recreation and access opportunities to motorized visitors. The lack of adequate consideration of area closure impacts on motorized visitors in the project area combined with the same lack of analysis in all travel plan documents has produced a significant cumulative impact that must be adequately evaluated and corrective measures must be implemented. (Organization, Helena, MT - #A13226.10141)

The environmental document must consider the following visitor profiles in addition to OHV enthusiasts as motorized visitors who use primitive roads and trails in the forest. People out for weekend drives, sightseers, picnickers, campers, hunters, fishermen, snowmobile enthusiasts, woodcutters, wildlife viewing, berry and mushroom pickers, equestrians, mountain bikers, and physically challenged visitors who must use wheeled vehicles to visit our public lands. The cumulative impact of all statewide-motorized closures on all of these visitors must be included in the environmental document. A statewide analysis is required because cumulative effects are forcing motorized visitors to travel farther and farther to fewer and fewer places to find motorized access and recreation opportunities. (Organization, Helena, MT - #A13226.70100)

#### **IN CONJUNCTION WITH OTHER MANAGEMENT PROPOSALS**

The environmental document must evaluate how all of the policy proposals over the past year have overwhelmed the public. There is no way that the public could have evaluated and commented on each proposed action. The cumulative impact of an overwhelming number of proposals is decision-making that does not provide for the needs of the public. These proposals include ICBEMP (inter-agency), 3-States (Montana, North and South Dakota) OHV Strategy, National BLM OHV Strategy, USFS Roadless, USFS Roads Policy, USFS Strategic Plan, North Belts Travel Plan, Clancy-Unionville Travel Plan, Whitetail/Pipestone Travel Plan, North Divide Travel Plan, South Divide Travel Plan, Blackfoot Travel Plan, South Belts Travel Plan, Lewis and Clark National Forest Travel Plan update, Montana State Trail Plan PEIS, Montana State Trail Grant Program PEIS, Grizzly Bear Recovery Plan, Post-fire Weed Mitigation EIS, Fire Salvage EIS, and other local travel plan actions in each National Forest. Motorized visitors have had to devote the majority of their available energy and time addressing local and national level travel plan actions. The combination of all of these actions has created a cumulative effect on motorized visitors by consuming their time, money, and quality of life. Very few motorized recreationists are paid to be involved in the protection of their interests. Additionally, this cumulative effect has led to the loss of opportunity for motorized recreationists to further the awareness and

education of all motorized visitors in areas such as proper riding ethics, safety, and environmental protection. This cumulative effect has also reduced the opportunity for motorized recreationists to improve and maintain existing motorized opportunities. This includes reduced maintenance of trailheads and trails and reduced ability to undertake mitigation projects to protect the environment and public safety. All of these cumulative effects must be addressed in the document and decision. (Organization, Helena, MT - #A13226.16000)

#### **INCLUDE THE IMPACTS OF ALL PAST MOTORIZED CLOSURES AND ROAD AND TRAIL OBLITERATIONS**

Timber sales have included many motorized closures as associated actions. Many timber sales with motorized closures were done without adequately addressing the impact on motorized visitors. Many of these motorized closures were done as a concession to those opposed to the timber sales and without input from motorized recreationists. Many of the closures and obliterations included historic travel ways used for exploration, mining, and travel in the early days. The environmental document must evaluate all past motorized closures and road and trail obliterations done as part of timber sales and the cumulative impact of those closures on motorized access and recreation. Furthermore, closures from past timber sales should be mitigated by connecting old and new travel ways to create a looped motorized trail system. (Organization, Helena, MT - #A13226.65200)

#### **INCLUDE IMPACTS OF MOTORIZED CLOSURES AS A RESULT OF WILDFIRE**

The fires of 2000 have required a significant number of motorized closures and these cumulative impacts have not been considered. All of these cumulative impacts on motorized visitors must be adequately addressed and provided for in the environmental document and decision-making. (Organization, Helena, MT - #A13226.30400)

#### **INCLUDE IMPACTS ASSOCIATED WITH ENVIRONMENTAL JUSTICE**

There is no comparable national recreation trail for motorized visitors equivalent to the Continental Divide Trail (CDT), Pacific Crest Trail, National Recreation Trail (NRT) and other national non-motorized trails that travel a long distance and interconnect with other forests. If motorized recreationists had national trails, they would see considerably more use. Non-motorized recreationists have considerably more national trail recreation opportunities than motorized recreationists. The document needs to evaluate the cumulative impacts and environmental justice issues surrounding the lack of national motorized trails on motorized recreationists and then identify and implement measures necessary to mitigate these impacts on motorized recreationists. (Organization, Great Falls, MT - #A15315.15160)

#### **INCLUDE NEGATIVE ECONOMIC IMPACTS**

The environmental document must evaluate the social and economic impact to motorized recreationists of not having motorized recreational opportunities in the nearby forests. These impacts include the cost of having to travel farther and farther in search of fewer and fewer motorized recreational opportunities in times of increasing travel costs. A 200-mile roundtrip costs at least \$70 and that cost will continue to increase substantially in the future. The document must evaluate the economic cost of fewer motorized recreation opportunities on motorized recreationists. The document must evaluate the cumulative effect of all management decisions that contribute to these social and economic impacts on motorized recreationists. (Organization, Helena, MT - #A13226.75400)

### **1159. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.**

#### **BECAUSE IT UNFAIRLY IMPACTS MOTORIZED USERS**

The proposed Roadless Rule selected by the Forest Service would eventually close the majority of existing roads and trails to motorized recreation. This preferred alternative forces motorized visitors and recreationists to start with the worst case scenario and then struggle to add routes currently in use back into the process at a late stage using the public comment. This course of action places an enormous burden on motorized visitors just to maintain the status quo. This process is providing preferential treatment for non-motorized visitors who do not have to identify routes and challenge the process to protect their recreation opportunities. We do not understand why the roadless rule process has been

devised to put motorized visitors at a disadvantage. We request that this procedure be evaluated and corrected. (Organization, Helena, MT - #A13226.10130)

**BECAUSE ROADLESS STATUS WILL TRUMP EXISTING FOREST DESIGNATIONS**

While the DEIS indicated that recreation use will not be adversely affected, we note that since some of the inventoried roadless areas were classified in the land and resource management plan as semi-primitive motorized recreation, and wildlife emphasis, a prohibition on roads and reconstruction would preclude meeting these management objectives. (Elected Official, Roseburg, OR - #A11811.25300)

**1160. Public Concern: The Forest Service should develop a management alternative which incorporates all existing motorized roads and trails and restricts motorized travel to those travelways.**

**TO AVOID CONTRIBUTING TO FURTHER CUMULATIVE IMPACTS ON MOTORIZED RECREATIONISTS**

A reasonable rulemaking alternative is needed in order to avoid contributing to the significant cumulative impacts that motorized recreationists have experienced. A reasonable alternative would incorporate all existing motorized roads and trails and restrict motorized travel to those travel ways. The Forest Service must adequately evaluate a reasonable alternative in the environmental document and decision-making. In order to avoid contributing to further cumulative impacts, we request that an alternative based on incorporating all existing motorized roads and trails and restricting motorized travel to those travel ways be included in the evaluation and selected by the decision-makers. (Organization, Helena, MT - #A13226.45400)

**1161. Public Concern: The Forest Service should close certain areas to prevent user-created trails while allowing use of existing motorized routes.**

**BECAUSE THE CUMULATIVE IMPACTS OF THE TRAVEL PLAN AND THE RULEMAKING PROCESS ON MOTORIZED RECREATIONISTS HAVE BEEN SIGNIFICANT**

Most of the primitive motorized roads and trails in roadless areas are not new or “user created” travelways. These roads and trails have existed for many years. The public has relied on them for access to the forest for many years and for many purposes. This pattern of use is well established. A reasonable alternative would use area closure to prevent the creation of unwanted trails by visitors and, at the same time, allow the public to use all of the existing motorized routes. Too many decisions have been enacted without the development of this reasonable alternative. The cumulative impact of the travel plan and rulemaking process on motorized access and recreation opportunities has been significant. We request that this reasonable alternative be included in the environmental document as the preferred alternative. (Organization, Helena, MT - #A13226.45514)

**1162. Public Concern: The Forest Service should reclassify roadways to restricted-width or unrestricted-width motorized trails.**

**TO AVOID CONTRIBUTING TO THE CUMULATIVE IMPACTS ON MOTORIZED RECREATION**

The environmental document must accurately address the significant negative impacts associated with disturbing existing stable roadways in order to obliterate the existing roadbed. A more viable alternative would be to reclassify the road to either restricted-width or unrestricted-width motorized trail. The preferred alternative should make practical use of this management tool and the benefits that it provides including reduced sedimentation impact, reduced fisheries impact, reduced noxious weed impact, much less construction cost, reduced road inventory, reduced road maintenance and increased opportunities for motorized recreationists. Reclassifying roadways to restricted- or unrestricted-width motorized trail also avoids contributing to cumulative impacts on motorized recreationists. (Organization, Helena, MT - #A13226.45500)

The Forest Service’s current management directive is to aggressively decommission non-beneficial or unclassified roads, reduce the existing backlog on road maintenance and reconstruction, and reduce the

resource impacts of the current roads network. The Forest Service in the Roadless Rule EIS reported that the backlog of forest road maintenance was about \$8.4 billion. This estimate includes many primitive roads and trails that motorized recreationists would prefer not to have improved. The challenge of these types of primitive roads and trails is just what most motorized recreationists are looking for. Therefore, this maintenance effort is overstated and a more reasonable alternative would be to incorporate reasonable mitigation measures and convert roads to unrestricted-width or restricted-width trails to provide motorized recreation opportunities and then remove these roads from the roads inventory. (Organization, Helena, MT - #A13226.45500)

## *Allow Motorized Recreation*

### **1163. Public Concern: The Forest Service should develop a comprehensive inventory of all existing motorized routes.**

#### **TO ASSIST IN PRESERVING MOTORIZED ACCESS**

A fair process would start with a comprehensive inventory of all existing motorized routes. Then, in order to avoid further cumulative loss and significant impact on motorized access and recreation opportunities, the Roadless Rule process must include a preferred alternative based on preserving all existing motorized routes. Any significant negative impact associated with a specific motorized route would be the basis for an evaluation to close or keep that route open. The cumulative loss of motorized recreation and access opportunities in the national forests has been significant. In order to avoid further cumulative impacts, the closure of an existing motorized route would be offset by the creation of a new motorized route. (Organization, Helena, MT - #A13226.91211)

### **1164. Public Concern: The Forest Service should designate land for motorized and mechanized access.**

I would favor some designation other than wilderness for many of these lands, so as to permit limited motorized or mechanical access where appropriate, on existing trails. Four wheelers should be limited to forest roads. Trail bikes and mountain bikes only, on trails. (Individual, Manhattan, MT - #A671.25360)

#### **WHERE ENVIRONMENTAL DAMAGE WILL BE MINIMAL**

I personally feel strongly about public access to national parks/forests employing motorized vehicles. There is an increasing trend for ATVs, off-road vehicles and snowmobiles to wreck the nature of wildness for people and wildlife. I would like to see "quiet" traditional uses upheld such as snowshoing, cross-country skiing, canoeing, hiking, biking etc. Having said this I know that there is a responsibility to provide for these other activities in areas less prone to impacting values. Sort of what happens when a city finally decides upon the location for an airport. In the case of dirt bikers-maybe a dune area inland of a beach where annual storms "clean the slate" (Oregon) or alkali playa, subject to inundation (Nevada), can be designated use areas. (Individual, Craig, AK - #A778.90100)

### **1165. Public Concern: The Forest Service should allow motorized vehicles in roadless areas.**

#### **MOTORCYCLES**

While our wilderness areas must be preserved, there must be balanced use for the benefit of all citizens. Motorcyclists are a substantial group within this country and have an equal right to use public lands as hikers, boaters, etc. (Individual, Darien, CT - #A595.91221)

#### **SIX OR EIGHT WHEELED VEHICLES**

Also permit ATV 6 or 8 wheelers allowed, NO 4 WHEELED. (Individual, Strongsville, OH - #A11136.91221)

**BATTERY-OPERATED VEHICLES FOR THE HANDICAPPED**

No motorized vehicles allowed, except for battery operated ones for the handicapped. (Individual, Coeur d'Alene, ID - #A4798.91221)

**TO ACCESS AND MAINTAIN GRAZING AREAS**

Roadless area protection should not be carried out in a manner as would require any cutbacks in domestic livestock grazing, or the curtailment of the use of any motorized equipment which has been traditionally used in the area to access or maintain grazing improvements or supervise livestock operations. For example, if a rancher needs to use ATVs for access, that should be permitted, as the economics of ranching operations in today's world may not always make horse or foot access practical. (Individual, Vail, CO - #A5371.90100)

**TO CARRY OUT BIG GAME FOR PROCESSING**

Allow only ATVs to bring big game, such as deer, to be processed. (Individual, Erie, PA - #A7326.91211)

**DEPENDING ON THE TERRAIN IN THE AREA**

The type of vehicle most suited to the terrain must be considered. Steep side hills should be accessed only by single-track vehicles (motorcycles and scooters) whereas more gentle areas may accommodate 3 and 4-wheeled ATVs. ATVs must not be allowed on single-track trails. The upcoming OHV Plan should be utilized to help address this issue and guide the overall Forest Plan. (Individual, Evergreen, CO - #A19178.91211)

**AS REQUIRED BY THE NATIONAL ENVIRONMENTAL POLICY ACT**

The significant closing of motorized routes in the project area does not meet the basic requirement of the NEPA act of 1969 as stated in "Sec. 101 (b) (5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities." A wide sharing of life's amenities must include recognizing and meeting the need for motorized access and recreation opportunities in the project area. We do not understand why this area and many others in the National Forest cannot be shared with all forest visitors. We meet so few hikers on the roads and trails that we use and we just don't understand the problem. Is it reasonable to excessively accommodate forest visitors that are not moderately tolerant and sharing? The evaluation in the environmental document, the decision-making and the current allocation of motorized versus non-motorized recreation and access opportunities in the National Forest must provide for an equal and wide sharing of life's amenities with motorized visitors. (Organization, Helena, MT - #A13226.20203)

**1166. Public Concern: The Forest Service should enhance opportunities for motorized recreation.**

The second principle of rulemaking actions should be to enhance the level of opportunities for motorized visitors in order to be responsive to the needs of the public. Enhancement could include roads and trails systems with loops, destinations such as lakes, mines, scenic overlooks, and inter-connections to other forests and regional trails. The document must develop alternatives that enhance opportunities for motorized recreationists and the decision-making must enact them. (Organization, Helena, MT - #A13226.91211)

**1167. Public Concern: The Forest Service should revise Management Areas 11 and 12 to allow motorized recreation.**

Please change the Forest Service's MAs 11 and 12 to allow motorized recreation to continue. (Individual, Superior, MT - #A6008.91211)

**1168. Public Concern: The Forest Service should not use disturbance of wildlife as a reason to deny motorized access.****BECAUSE STUDIES HAVE SHOWN THAT HIKERS DISTURB WILDLIFE MORE THAN MOTORIZED VISITORS**

A study of National Park elk habituated to human activity and not hunted were still more sensitive to persons afoot than vehicles (Shultz, R.D. and James A. Bailey "Responses of National Park Elk to Human Activity", Journal of Wildlife Management, v42, 1975). Therefore, hikers disturb elk more than motor vehicles and "disturbance of wildlife" must not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors. A study of the heart rate of elk found that humans walking between 20 to 300 meters from the elk caused them to flee immediately 41% of the time while an OHV passing within 15 to 400 meters of the elk caused them to flee 8% of the time (Ward, Lorin A., Jerry J. Cupal, "Telemetered Heart Rate of Three Elk as Affected by Activity and Human Disturbance" Planning for Trailbike Recreation, U.S. Department of the Interior Heritage Conservation and Recreation Service, 1976). Therefore, hikers disturb elk more than motor vehicles and "disturbance of wildlife" must not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors. (Organization, Helena, MT - #A13226.53300)

A study of mule deer found that 80% fled in reaction to encounters with persons afoot while only 24% fled due to encounters with snowmobiles (David J. Freddy, Whitcomb M. Bronaugh, Martin C. Fowler, "Responses of Mule Deer to Persons Afoot and Snowmobiles", Wildlife Society Bulletin, 1986). Therefore, hikers disturb elk more than motor vehicles and "disturbance of wildlife" must not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors. (Organization, Helena, MT - #A13226.53300)

**1169. Public Concern: The Forest Service should allow airplanes in roadless areas.****THOSE THAT CAN LAND ON WATER**

All motor vehicles should be prohibited except airplanes that can land on lakes. (Individual, Prescott, AZ - #A21064.90110)

**BY MAINTAINING PRIMITIVE BACKCOUNTRY AIRSTRIPS**

I strongly endorse retaining roadless area access via existing and historical primitive backcountry airstrips.

The small aircraft capable of operating from these strips have minimal to no adverse effect upon the areas. In addition, the aficionados of "bush flying" that use the strips typically perform all the requisite minimal, low-impact maintenance required to keep the strips useable by light aircraft, and absorb related costs themselves.

In addition to offering recreational access for hiking, camping, and fishing (while reducing land vehicle impact) these strips can, on occasion, be useful for medi-vac and fire fighting purposes, and can possibly serve as emergency landing fields for aircraft traversing the area. (Individual, Longmont, CO - #A27112.90100)

**BY MAINTAINING AIRSTRIPS AT RANGER STATIONS**

Existing airstrips at ranger stations (Bob Marshal Wilderness) should be maintained and emergency evacuation by helicopter should be permitted. Float-planes should be limited to emergency and occasional access for rangers. (Individual, Missoula, MT - #A30559.90000)

### **1170. Public Concern: The Forest Service should allow competitive motorized events in roadless areas.**

Competitive, motorized group events should be expressly allowed. (Individual, Greeley, CO - #A28995.91210)

### ***Do Not Allow/Restrict Motorized Recreation***

### **1171. Public Concern: The Forest Service should prohibit motorized vehicles in roadless areas.**

Specific activities that should be expressly prohibited in roadless areas would include operating motorized vehicles, especially snowmobiles and dirt bikes, and ATVs. These machines are extremely polluting, destructive to the ecology of the area, and drive away animals, as well as destroying the wilderness experience for non-motorized users for miles in every direction. (Individual, No Address - #A470.91221)

I am writing to express my opinion concerning roadless area conservation, in particular the use of off-road recreational vehicles. I feel the U.S. Forest service has an obligation to maintain existing roads as well as ensuring access to private property located adjacent to federal lands. I do not however, feel that it is the U.S. Forest Service's obligation to maintain and monitor roads for recreational vehicle use. I am a four-wheel enthusiast myself, and realize the impact that my vehicle has to wildlife and terrain. It is my opinion that there should be no use of these vehicles on federal lands for recreational purposes, due to the dangers that overuse can present. I can tell you from experience that it doesn't take long for these vehicles to start eroding the top-soil, the national parks are sanctuaries for the common man. They are a place where we can take our families to show them the wonders of nature, and the great land that is America. I feel that off-road vehicle use would be a distraction to those not in participation. Once again, it is my opinion that the U.S. Forest Service should reject all recreational off-road vehicle use in our national parks and forest areas. (Individual, Houston, TX - #A519.91221)

Roadless areas should be protected from destructive vehicle use. Vehicle use should not be allowed except by Forest Service employees in pursuit of their duties or emergency personnel. Off road vehicles, including the ATV and Snowmobiles are not environmentally friendly and they should not be allowed. Currently there are thousands of miles of ghost roads, illegal roads created by logging trucks, off road vehicles and ATVs, within the boundaries of our National Forests. (Individual, Coulterville, IL - #A114.90000)

All motorized activity should be prohibited in roadless areas—no motorcycles, cars, ATVs, or snowmobiles. (Individual, Bozeman, MT - #A624.91221)

#### **TWO-CYCLE ENGINES**

No two-cycle engine vehicles. (Individual, No Address - #A491.91221)

#### **GASOLINE, DIESEL, AND ALCOHOL ENGINES**

NO gasoline engines at all for anybody, for any reason. None. Only firefighting equipment may use engines. No one should be allowed to use a gas, diesel, etc. engine for ANY reason otherwise. Simple and effective. Try it, you'll like it. No concrete! No permanent building of any kind, period, except fire towers. No offices. No houses, no yards, no fences, no maintained trail, no footbridges, no shelters that are permanent. (Individual, Jackson, MI - #A7273.90000)

NO gas, diesel, alcohol, etc, engines. (Individual, Jackson, MI - #A7273.90110)

**VEHICLES THAT REQUIRE MORE THAN A SINGLE TRACK**

All activities that require a road (anything wider than a single track) like ATVs, and four wheeling should be prohibited. (Individual, Woodland Park, CO - #A14027.90110)

**ON NEW BUT CLOSED ROADS**

The use and availability of open roads to the public should be a local issue with a few guidelines, i.e. Quads (dirt motor bikes and motorcycles), snowmobiles should be prohibited on new, but closed roads. (Individual, Olympia, WA - #A20848.90000)

**TO ELIMINATE USER CREATED TRAILS**

I believe that the Roadless Area Conservation Rule would be improved by adding firm measures to curb the problems caused by motor vehicles that cut new paths on the terrain when they drive beyond authorized travel ways. This is a rapidly expanding problem in Nevada and Eastern California. (Individual, Carson City, NV - #A11788.91221)

**DUE TO INCREASED VANDALISM AND CRIME**

The problem we are now coming to grips with is ATVs and snowmobiles in the winter. With those modes of travel it is easier to litter and dispose of unwanted trash, appliances, hazardous waste and not be detected for some time. Summer, spring, fall, and winter present all the challenges one can imagine, wild parties in the Wilderness Areas, poaching, you can even catch disposable diapers and spare tires, even used appliances. Garbage and trash are being tossed in our waterways. (Individual, Morrisville, VT - #A7953.90110)

A final and often overlooked impact is serious crime; virtually all felonies that have occurred on the ANST (Appalachian National Scenic Trail) are within an easy walk of a motorized route. As you know, enforcement is difficult, and the problem is exacerbated where roads cross or are in the vicinity of the trail. (Organization, Harpers Ferry, WV - #A21737.90110)

**DUE TO ANIMAL HARRASSMENT**

Game animals are being harassed by adolescents on motorbikes and ATVs. We also have a small percentage of adults doing the same. The big problem everywhere is the manpower shortage. I would strongly urge you not to open any more access until such time as we have adequate manpower to police the areas once the door is open. (Individual, Morrisville, VT - #A7953.90110)

**DUE TO INCREASED WILDFIRE DANGER**

Just the rash of forest fires we are now experiencing should be warning enough. The weather of late has been too extreme. I have driven on the highways we now have and witnessed cigarettes being tossed from moving vehicles, along with cigars. (Individual, Morrisville, VT - #A7953.90110)

**1172. Public Concern: The Forest Service should prohibit helicopters and airplanes in roadless areas.**

The following activities should be completely prohibited in roadless areas: . . . close overflight by helicopter or airplane guide server. (Individual, Port Angeles, WA - #A6179.90110)

Helicopters should not be permitted to land or to fly below 2,000 AGL over roadless areas. (Individual, West Glacier, MT - #A5946.90110)

**1173. Public Concern: The Forest Service should prohibit powerboats in roadless areas.**

NOT allowed; Roads, logging, mining, summer homes, resorts, and NO OFF ROAD VEHICLES, SNOWMOBILES, POWER BOATS, LOW FLYING AIRCRAFT, or hunting, except for the enlightened wildlife management. (Individual, San Jose, CA - #A6276.90110)

No outboard motors on lakes, and no motor vehicles on land, snowmobiles, ATVs, motorcycles, etc. (Individual, Caledonia, WI - #A7531.90110)

## Other

### **1174. Public Concern: The Forest Service should seize vehicles that violate regulations in wilderness areas.**

Protect only wilderness areas and allow the seizure of vehicles that violate wilderness areas. (Individual, Sparks, NV - #A4805.91211)

### **1175. Public Concern: The Forest Service should prohibit the development of recreational vehicle parks.**

We do not need RV Parks. (Individual, Hobbs, NM - #A11008.90920)

### **1176. Public Concern: The Forest Service should clarify how roadless area designation would impact backcountry airstrips.**

It is unclear how the roadless initiative might impact backcountry airstrips. These airstrips may be located in areas designated as roadless. We support backcountry airstrips as a valuable transportation resource that is of low environmental impact. (State Agency, Sacramento, CA - #A28870.16110)

## Motorized Recreation – Off-Road Vehicles

### Summary

**General Comments** – One Organization suggests that the Forest Service should use Executive Order 11909 as a management tool to govern management of off-road vehicles. They believe this is a powerful management tool that the Forest Service can use to maintain resources while providing diverse OHV recreational opportunities.

**Funding** – According to an Organization, federal and state agencies must evaluate why the OHV gas tax system does not function to serve the needs of OHV recreationists. Then a plan should be developed and implemented that will use OHV gas tax monies to address the needs of OHV recreationists. Another respondent writes that there should be no off-road vehicles in roadless areas, that there should be other places for them to ride.

**Off-Road Vehicles** – Some respondents assert that the Forest Service should allow off-road vehicle use in roadless areas. According to one individual, user conflicts seem to be the major issue facing all of the recreational uses and hopes that the Roadless Rule will not ban OHV/ORV use in these areas. This person believes there is minimal environmental damage.

Others state that the Forest Service should prohibit off-road vehicles in roadless areas. One respondent concludes, due to the damage caused by off-highway vehicles to soil, vegetation, water quality, wildlife, and solitude, all off road vehicles should be banned from inventoried roadless areas.” A few individuals suggest restricting this activity by requiring off-road vehicle users to have permits. Rather than close the forest roads, offers one respondent, permits should be required areas for such activities as hunting, which would require a training session about respecting the land and the Forest Service would be able the one abusing the system.

## *Off-Road Vehicles General*

### **1177. Public Concern: The Forest Service should use Executive Order 11909 as a management tool to govern management of off-road vehicles.**

#### **TO MAINTAIN RESOURCES WHILE PROVIDING DIVERSE OFF-ROAD VEHICLE RECREATIONAL OPPORTUNITIES**

Executive Order 11909, signed by President Jimmy Carter on May 24, 1977, authorizes public land managers to close routes or areas negatively impacted “to the type of off-road vehicle causing such effects, until such time as he (the administrator) determines that such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence.” The Executive Order is a powerful management tool that the Forest Service can use to maintain resources while providing diverse OHV recreational opportunities. (Organization, Pickerington, OH - #A3645.90420)

## *Funding*

### **1178. Public Concern: The Forest Service should develop a plan to use gas tax money to address the needs of off-highway vehicle recreationists.**

Fuel Used for off-road recreation in Montana is estimated at 20,199,323 gallons per year (Report ORNL/TM-1999/100, Federal Highway Administration). The State of Montana allows a refund of \$0.2775 per gallon for off-road fuel use to account for the value of improvements and programs that purchasers of OHV gas do not receive through the federal highway program (<http://www.mdt.state.mt.us/administration/gastaxrefund.html>). Therefore, about \$5,605,312 is paid by off-road recreationists in fuel tax each year and should be available to support OHV recreation. This amount of annual funding would be sufficient to address all OHV mitigation, maintenance and educational projects necessary to protect the environment and meet motorized recreationists' needs. However, very little of this money is returned to OHV recreation. Therefore, OHV recreationists have a substantial funding mechanism in place in the form of gas tax, yet very little of this tax is returned to OHV projects.

Federal and state agencies must evaluate why the OHV gas tax system does not function to serve the needs of OHV recreationists. Then a plan should be developed and implemented that will use OHV gas tax monies to address the needs of OHV recreationists. The document must evaluate justice issues surrounding the use of OHV gas tax monies for purposes not related to OHV recreation. The document must evaluate the cumulative effects on motorized recreationists of diverting OHV gas tax monies including the impacts associated with the lack of maintenance, the backlog of maintenance, the lack of mitigation projects, the lack of education and management programs, and the resulting loss of OHV opportunities and reduced quality of life for OHV recreationists. (Organization, Helena, MT - #A13226.17110)

### **1179. Public Concern: The Forest Service should use funds to enforce the exclusion of off-road vehicles from nondesignated areas.**

Ban off road vehicles. Make areas for these vehicles. Then use funds to enforce their exclusion from the rest of the forest. (Individual, Ellijay, GA - #A8020.91221)

## *Allow Off-Road Vehicles*

### **1180. Public Concern: The Forest Service should allow off-road vehicle use in roadless areas.**

#### **BECAUSE BOTH USER CONFLICTS AND ENVIRONMENTAL DAMAGE ARE MINIMAL**

User conflicts seem to be the major issue facing all of the recreational uses. I hope that the roadless initiative will not ban OHV/ORV use in these areas. I feel that the conflicts are minimal as well as the environmental damage. Local clubs and groups can correct this damage. I feel that the wilderness groups are extreme in their demand that public lands should exclude everyone but backpackers. The philosophy of OHV groups and wilderness groups are mutually exclusive. The myth of a wilderness paradise where man lives in harmony with nature is a strong theme in wilderness groups. Such a state never existed, nature is cruel, hard and we don't do to well on our own in nature. Thanks to technology we do not freeze in the dark with a bacterial infection. I too am conflicted.

On the one hand I want to conserve the natural beauty of our forestlands and on the other I want to enjoy the recreational activities, somehow a balance can be achieved. (Individual, Denver, CO - #A841.91211)

Many activities are viewed as dangerous to the land, yet are not. It seems people believe words over reality. Reality is that OHVs, like trail motorcycles and mountain bikes do little if any damage to the land, yet we like to BELIEVE they do. Again visiting the land in question is the only way to view what is REALLY going on. (Individual, Humboldt, TN - #A464.90000)

#### **ALLOW OFF-ROAD VEHICLES NOT LICENSED FOR THE STREET**

Allow use of specific roads for OHVs that are not licensed for the street in order to develop a system that ties OHV trails together. (Organization, Helena, MT - #A13226.91211)

#### **IN CALIFORNIA**

I hope and plead that you will keep access the same as it has been in the past. I live in California and hope off-road access will remain available in areas like Pismo Beach and Gorman and be reopened in other available areas while access in areas like Yosemite shall remain by foot and horseback. (Individual, Santa Barbara, CA - #A21204.90100)

## *Do Not Allow/Restrict Off-Road Vehicles*

### **1181. Public Concern: The Forest Service should restrict off-road vehicle use.**

#### **BY REQUIRING OFF-ROAD VEHICLE USERS TO HAVE PERMITS**

I love the forests and as an off road biker and 4-wheeler I respect the environment. By taking my kids deep into the forests I am able to teach them a loving respect for nature as well. If the public is denied easy access to the wilderness then less of our next generation will know why we want to protect the forest. Rather than close the forests roads, require permits to access these areas like hunting, which requires a training session on respect for the land and a visible number to identify the unlawful. It is a few who have disrespect who are ruining it for thousands. The forest service needs to do a better job of patrolling areas to keep the big wheeler mud rukklers from tearing up roads and wetlands. (Individual, No Address - #A296.90000)

Any activities which are in keeping with the goals of preservation should be permitted. ORV/OHV use may be compatible in some circumstances, but motorized vehicles should be permitted only where access is specifically granted. (Individual, Denton, TX - #A156.90110)

**1182. Public Concern: The Forest Service should prohibit off-road vehicles in inventoried roadless areas.**

I believe the existing Roadless Area Conservation Rule (regardless of the legally flawed decision of Judge Lodge's ruling) should be selected and implemented, with one change. I believe that, due to the damage caused by off-highway vehicles to soil, vegetation, water quality, wildlife, and solitude, that they should be banned from ALL inventoried roadless areas. (Individual, Idaho Falls, ID - #A11733.10150)

**IN THE SHAWNEE NATIONAL FOREST**

No off-road vehicles . . . in Shawnee National Forest. (Individual, Glencoe, IL - #A21487.90110)

**Motorized Recreation – Snowmobiles****Summary**

**Adequacy of Analysis** – One individual suggests the Forest Service could better manage winter motorized recreation by more adequately evaluating the number of user days for snowmobiling.

**Snowmobiles** – Of those who specifically address snowmobiling, most say the activity should be allowed in roadless areas. One individual remarks that snowmobiling is his passion and is concerned that they are seeing more and more areas closed off to this sport. Several respondents add that they do not cause damage to the soil, create trails and their tracks melt away. They do not see an adverse impact to the environment. Others do not believe that the Forest Service should not allow snowmobiles in roadless areas. These respondents feel that air and noise pollution ruin their backcountry experience.

*Adequacy of Analysis***1183. Public Concern: The Forest Service should reevaluate the number of user days for snowmobiling.****IN WISCONSIN**

Note that both US Forests in Wisconsin are in the snow-belt and have had 60+ to 100 days of excellent snow trail conditions over the past 30 years. The Southern end of Wisconsin has few snow-trail user days. I do feel that the US Forest Service in Wisconsin does a marginal job at counting/measuring user days for snowmobiling family recreation. Snowmobilers want to keep the trails that exist today, however USFS documentation on winter snowmobiling use is weak and misleading.

I have personally ridden all the Wisconsin winter snowmobile trails in Jan and Feb 2001 that are currently within the USFS roadless inventoried lands. These trails tend to connect smaller communities via remote forest winter trails that have considerable use, especially on three-day weekends. (Individual, Thiensville, WI - #A28617.91213)

*Allow Snowmobiles***1184. Public Concern: The Forest Service should allow snowmobiles in roadless areas.**

Change MAs 11 and 12 to allow snowmobiling to continue in areas where it already is. Snowmobiles should not be kicked out of an area just because it is considered a roadless area. Motorized recreation should continue in these areas. (Individual, Superior, MT - #A3723.91211)

As a SNOWMOBILE rider, I do resent the fact that those “spandex lovers” are working very hard to make snowmobiles extinct. We spend \$9.4 billion every year for our sport . . . cross country skiers are CHEAP . . . I have actually been asked to give them HOT WATER so they can make tea while they sit in the cafe and drink it without buying even a doughnut! Snowmobiles have the LEAST IMPACT ON THE GROUND of all motorized vehicles . . . we watch bobcats and birds and rabbits every time we go out for a ride . . . they don’t even care if we are there! They are too busy doing their own survival thing. (Individual, Mazama, WA - #A757.91213)

I am writing this because my father just informed me that the lawmakers are meeting again to discuss whether or not to make more laws restricting our wilderness area. I am strongly opposed to this. I am 27 years old and have snowmobiled with my father for more than 20 years now. We live in California. Snowmobiling is my passion, it is my escape from the world. My father has always raised me to be kind and responsible with nature, not to be foolish. In the last few years we have seen some of our favorite places to visit be deemed ‘off-limits.’ I don’t understand why . . . . We never hurt anything. Our snowmobiles never even touch the soil.

I think that the government has done more than enough to restrict the much sought after nature destinations that people like me deserve to experience. (Individual, Hayward, CA - #A5339.91213)

#### **BECAUSE THEY DO NOT CREATE ROADS AND TRAILS AND THEIR TRACKS MELT AWAY IN THE SPRING**

Snowmobiles have been the bugaboo of environmentalists in the Greater Yellowstone region for the past few years, but I believe the controversy is merely a question of management. Roadless areas should be open to a wide array of recreation users - including hikers, mountain bikers, horseback riders, llama outfitters, skiers, and, yes, snowmobilers. Over-the-snow vehicles do not create roads and trails; their tracks melt away in the spring. (Individual, West Yellowstone, MT - #A1045.90100)

#### **IN THE HIAWATHA NATIONAL FOREST**

I spend a lot of time in Hiawatha National Forest and I can tell you we are not hurting the environment with the current status.

Hiawatha National Forest is extremely important to my livelihood. My wife and I own a small resort on the edge of the forest. The forest allows people to come to our area 2 months a year for the various recreational activities. Spring, summer, and fall require automobile traffic on the forest roads. Winter time traffic consists of snowmobile traffic. Snowmobiling has allowed Michigan’s Upper Peninsula to become a true winter wonderland. We actually need to open more seasonal roads for groomed snowmobile trails. The safety of snowmobilers rests in developing additional groomed trails. Additional trails do not require additional roads, just grooming more existing forest roads. (Individual, Christmas, MI - #A6694.45611)

### *Do Not Allow/Restrict Snowmobiles*

#### **1185. Public Concern: The Forest Service should not allow snowmobiles in roadless areas.**

Last winter I attempted to enjoy a nice winter camping trip in the Snoqualmie-Mt. Baker NF and was treated to an endless procession of snowmobiles. What enabled us to get away from the carbon monoxide and hellish roar of horribly inefficient 2-stroke engines? Skiing far off of the National Forest roads. (Individual, Redwood City, CA - #A1221.91221)

## **Non-Motorized Recreation**

### **Summary**

**General Comments** – According to some respondents, the Forest Service should acknowledge that there is very little demand for non-motorized recreation opportunities. One Organization states, “The opportunity to provide for the nation’s pedestrian recreation—how much of a need is

there vs. how much of an opportunity already exists; i.e. Designated Wilderness Areas managed by the U.S. Forest Service comprise 18% of the total National Forest System. However, only 4.25% of all forest visitors access Wilderness areas for their recreational pleasures. Based upon agency statistics it would appear as if the need for pedestrian recreation opportunities is low.” A county commissioner adds that, according to recent studies, “road usage is the predominate recreational use, and even wilderness use is limited to those areas close to roads.”

**Non-Motorized Recreation** – Some individuals state that the Forest Service should allow non-motorized activities in roadless areas. One respondent remarks, “Any non-motorized activity should be allowed in roadless areas, as it is hard to imagine an activity of this sort that would be very harmful.” Another person suggests that the Roadless Area Conservation Rule would discourage hiking, and so should not be implemented.

On the other hand, one individual suggests that jogging be prohibited in roadless areas. Another person writes, “Whereas there are great quantities of public lands currently closed to motorized recreation and these lands are severely under-utilized because of lack of non-motorized recreationists, I hereby propose that there is a freeze imposed on any new classification of non-motorized public lands.”

### *Non-motorized Recreation General*

#### **1186. Public Concern: The Forest Service should acknowledge that the need for non-motorized recreation opportunities is low.**

The opportunity to provide for the nation’s pedestrian recreation—how much of a need is there vs. how much of an opportunity already exists; i.e. Designated Wilderness Areas managed by the U.S. Forest Service comprise 18% of the total National Forest System. However, only 4.25% of all forest visitors access Wilderness areas for their recreational pleasures. Based upon agency statistics it would appear as if the need for pedestrian recreation opportunities is low. (Organization, Basalt, CO - #A10621.45100)

##### **NON-MOTORIZED RECREATION DOES NOT DEPEND ON LARGE UNROADED AREAS**

It is important that when examining the roadless issue, that the facts be closely analyzed. For example a clear misconception is that roadless demand is increasing, when in fact there is not only no scientific support for this position, but the scientific data available indicates just the opposite.

While the DEIS (3-120) noted that:

“Recreation use data has never been collected specifically for inventoried roadless and other unroaded areas. As a result, estimates of environmental consequences based on use cannot be made with any degree of precision.”

A review of the Forest Service’s own research reveals . . . numerous reports on the recreational use of the roadless areas. Most notable are the recent monitoring reports and studies of unroaded recreation usage that indicate that the recreation use of the unroaded areas is not dependent upon large areas of unroaded lands. Rather, these recent studies indicate that road usage is the predominate recreational use, and even wilderness use is limited to those areas close to roads. (Elected Official, Roseburg, OR - #A11811.45100)

### *Allow Non-motorized Recreation*

#### **1187. Public Concern: The Forest Service should allow non-motorized activities in roadless areas.**

Any non-motorized activity should be allowed in roadless areas, as it is hard to imagine an activity of this sort that would be very harmful. Other activities should be examined individually to determine their affect with respect to the goal of the roadless area. (Individual, Tucson, AZ - #A4938.90413)

### **1188. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.**

#### **BECAUSE IT WILL DISCOURAGE HIKING**

This roadless rule will do more harm than good. Many laws like it have been twisted and manipulated therefore working against what it is to protect. I think that this will make hiking more restricted considering there have been people arrested and charged for picking up rocks they were charged with “removing archaeological resources” from Lake Oroville CA. This case was dismissed but many are not. The roadless rule will inevitably make hiking a thing of the past along with other activities that the every day person enjoys. I don’t like the fact that even now I could be arrested for picking up rocks or finding a coin on the ground. I would like to request that the roadless rule not be put in effect. (Individual, No Address - #A7149.10130)

### **1189. Public Concern: The Forest Service should allow non-motorized, backcountry recreation.**

#### **FOR INDIVIDUALS AND GROUPS OF LESS THAN 12 PEOPLE**

Activities that should be allowed are non-motorized, backcountry recreation for individuals and small groups (less than 12 people). (Individual, Waterbury, VT - #A15433.90100)

### *Do Not Allow/Restrict Non-motorized Recreation*

### **1190. Public Concern: The Forest Service should prohibit non-motorized recreation in roadless areas.**

#### **JOGGING**

No . . . jogging . . . or other activity that could fragment these last stretches of unbroken forests, disturb their inhabitants, or weaken their capacity to support diverse wildlife. (Individual, Olympia, WA - #A16987.90110)

### **1191. Public Concern: The Forest Service should impose a freeze on any new classification of public land as non-motorized.**

#### **BECAUSE LARGE AREAS OF PUBLIC LAND CURRENTLY CLOSED TO MOTORIZED RECREATION ARE SEVERELY UNDERUSED**

Whereas, there are great quantities of public lands currently closed to motorized recreation and these lands are severely under-utilized because of lack of non-motorized recreationists, I hereby propose that there is a freeze imposed on any new classification of non-motorized public lands. (Individual, Clancy, MT - #A6721.45500)

## **Mechanized Recreation**

### **Summary**

A number of mountain bikers state that mechanized recreation should be allowed in roadless areas because, they maintain, the sport is growing in popularity does not interfere with pedestrian recreationists. One person who claims not to be a fan of mountain biking acknowledges that “in general they do not require roads, are quieter, and you can’t penetrate a wilderness nearly so far on a bicycle as on a machine, and you can’t haul nearly so much litter with you.” Others, however, assert that mountain biking can damage the environment and so “should be prevented in erosion-prone areas.”

## *Allow Mechanized Recreation*

### **1192. Public Concern: The Forest Service should allow mountain biking in roadless areas.**

Mountain bikes should be allowed in any and all roadless areas. I ride a great deal and seldom see a hiker any great distance from the parking lot. On days when I do trails work I rarely see a hiker but see lots of mountain bikers. (Individual, Crestline, CA - #A123.91210)

I think a special exception should be made for non-motorized travel, specifically MOUNTAIN BIKING, but also including horses and hikers etc. This land is our heritage we should be allowed to have access to it. And what better way than to ride a bike to see it? It is non-polluting and easy on the land. (Individual, No Address - #A850.91210)

I'm an avid mountain biker. I also am a member of an outdoor club. (The Warriors Society), that has hikers as well as mountain bikers included in the membership. The Warriors Society does almost all the trail maintenance in the Trabuco district of the Cleveland national Forest. I am most concerned that "Roadless" is a prelude to excluding mountain bikers from using OUR wild areas. It has been drawn to my attention that Mountain Biking is constantly under fire from all sides. The only people that want it excluded are the ones who have never participated in the sport and therefore see no need for it.

What is going to be an allowable activity in the "roadless areas." If roadless means that two years after passage, the Government or other influence is going to ban Mountain biking I'm very much against "Roadless." Taking the Government's word that they will never turn this into a ban is NOT an option, so you can put me down as against "Roadless." (Individual, Anaheim, CA - #A337.91214)

I am no fan of mountain bikes, but in general they [do not] require roads, are quieter, and you can't penetrate a wilderness nearly so far on a bicycle as on a machine, and you can't haul nearly so much litter with you. (Individual, No Address - #A470.91214)

#### **IN THE CLEVELAND NATIONAL FOREST**

I am very much personally concerned with any changes that affect trail access to the Santa Ana Mountains. I am a frequent trail user and ardent environmental conservationist. I served for five years as a Park Ranger Reserve for Orange County, a volunteer position. I am also an avid mountain biker and choose that as my primary means to access the Santa Ana Mountains. Those who mountain bike in this area are among the most responsible trail users, generally doing more to maintain trails and wilderness than to harm it. We tend to be the more experienced and older mountain bikers. (I am 47 years old).

I urge that any changes made to designations in the Cleveland National Forest specifically permit mountain biking on all multi-purpose trails. I would support any efforts made to ban road building or any access of motorized vehicles where they are not currently permitted. (I am also a motorcyclist, but have no desire to expand access beyond what is currently available. (Individual, Trabuco Canyon, CA - #A26030.91214)

## *Do Not Allow/Restrict Mechanized Recreation*

### **1193. Public Concern: The Forest Service should restrict mountain biking.**

#### **IN EROSION-PRONE AREAS**

Mountain biking should be prevented in erosion-prone areas. (Individual, Chapel Hill, NC - #A8742.90110)

Local forester input would be very useful on this subject, prohibitions should be established that would best protect depending on the potential risk of damage to a particular area, i.e. no fishing in endangered

species areas, fire bans in dry areas, no bikes in erosion prone areas, etc. (Individual, No Address - #A8998.90000)

## Ski Area Development

### Summary

**General Comments** – General comments on ski area development are somewhat varied. One Permit Holder recommends that the Forest Service employ a panel advisory committee to review ski area requests for expansion. Another remarks that “the Forest Service has already decided that ski area operations are consistent with roadless area protection and management,” and suggests that the Agency should use explicit language in its documents to clarify its position. One respondent requests that the Forest Service specifically address ski ways, ski runs, and ski trails and the use of snowcats or other off-highway vehicles in inventoried roadless areas adjacent to ski areas. Some comment on the potential effects of a national roadless rule and request that the Agency not implement any rule that would alter current ski area special use permit rights. Finally, one respondent requests that alpine skiing be allowed in roadless areas adjacent to existing ski areas.

**Ski Area Development** – A number of respondent who specifically address ski area expansion, assert that it should be allowed. These respondents state that there is a growing demand for outdoor recreation and that ski area operations can be compatible with roadless protection. According to one business, “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 IRAs.” Respondents also list a number of specific areas where they say ski area expansion should be allowed.

Other respondents state that the Forest Service should not allow ski area expansion outside of current ski area permit boundaries. One respondent concludes, “Skiing is not an activity that has increased in number in the past years and I believe the number of resorts now available for this purpose is quite adequate.” Others suggest that the Forest Service should review ski use permits and manage such areas in a more restrictive manner.

### *Ski Area Development General*

#### **1194. Public Concern: The Forest Service should review ski area requests for expansion.**

##### **WITH A PANEL ADVISORY COMMITTEE**

In order to maintain economic vitality, which in turn fosters good stewardship in the forests, we must not neglect the resorts’ ability to seek additional opportunity. This opportunity could come in many forms—improving facilities in the existing permit area, allowing for the careful expansion into areas adjacent to the existing permit area, as well as reviewing the possibility for additional terrain being added which may bear the IRA roaded construction/maintenance allowed classification. All of these potential uses would require the careful review of the Forest Supervisor as well as the District Ranger to ensure the compatibility with the environmental considerations. Again, I would propose a review that took on a panel advisory committee’s recommendations as further evidence of a complete and thorough review process. (Business, Twin Bridges, CA - #A8808.90810)

**1195. Public Concern: The Forest Service should use specific language to clarify its position on ski area operations.**

The Forest Service has already decided that ski area operations are consistent with roadless area protection and management. However, this conclusion is founded upon inquiries with knowledgeable agency personnel and a close reading of the final rule, the preamble, and other agency documents. Instead, explicit language is essential to clarify Forest Service intent. (Permit Holder, Avon, CO - #A28852.10120)

**1196. Public Concern: The Forest Service should address ski ways, ski runs, and ski trails and the use of snowcats or other off-highway vehicles in inventoried roadless areas adjacent to ski areas.**

Forest Service Roadless Area Conservation Final Rule Questions and Answers at 10. The preamble to the Final Rule also stated that timber cutting and removal would be allowed for “authorized activities such as ski runs and utility corridors.” 66 Fed. Reg. 9, p. 3,258. Nor are ski runs, ski trails, and ski ways at four-season resorts considered “roads” under the Final Rules. The Final Rule would narrowly prohibit road construction and reconstruction; it carefully defines “roads” as a “motor vehicle travelway over 50 inches wide, unless designated and managed as a trail.” Final Rule [section] 294.11. Ski runs, ski trails, and ski ways appear to be exempt “trails.” And nothing in the Final Rule was intended to affect the use of snowcats, snowmobiles, or other off-highway vehicles in inventoried roadless areas adjacent to ski areas.

A representative of Vail Resorts spoke by telephone on December 1 and 8, 2000 with [the] Project Director of the Forest Service Roadless Project [who] confirmed that: ski ways, ski runs, and ski trails do not constitute roads under the proposed rules; the construction and use of ski ways, ski runs, and ski trails in inventoried roadless areas would not be affected by the proposed rules; and the proposed rules do not affect the use of snowcats or other off-highway vehicles in inventoried roadless areas adjacent to ski areas. (Permit Holder, Avon, CO - #A28852.45200)

**1197. Public Concern: The Forest Service should not implement a national roadless rule that would alter current ski area special use permit rights.**

The SUPs held by MMSA are in essence agreements or contracts between MMSA and the Forest Service. The issuance, making, and entering into of SUPs are a product of, and are consistent with, the Forest Plan then in effect (identified herein as the Plan), and the management prescriptions contained therein. This entire process is being circumvented, and the rights vested in special use permittees such as MMSA are being affected and obviated in the event the Roadless Initiative is adopted. (Permit Holder, Mammoth Lakes, CA - #A21901.75320)

**1198. Public Concern: The Forest Service should allow alpine skiing in roadless areas adjacent to existing ski areas.**

If roadless area designations are to be applied to parcels of land that are adjacent to existing ski areas or permit boundaries, the applicable Forest Plan should not expressly prohibit use of the area for alpine skiing for those parcels. (Permit Holder, Stateline, NV - #A21708.91213)

***Allow Ski Area Development*****1199. Public Concern: The Forest Service should permit ski area expansion.**

Please open up more roads, so we can go on scenic drives into the forest. Also, allow some ski areas to expand their skiing terrain. (Individual, Bozeman, MT - #A1511.90100)

It is the ski industry’s view that parcels adjacent to existing developed recreation sites should not be designated “roadless”, as they may have some, but not all, of the characteristics commonly associated with roadless areas. If such adjacent parcels are designated as roadless, forest planning guidance or

directives should clarify that for planning purposes, it should be assumed that ski area operations can be compatible with roadless management. Even the agency's Final Environmental Impact Statement (FEIS) in Roadless Area Conservation, issued in November, 2000, acknowledged that "new ski areas, or expansion of existing ski areas outside existing special permit boundaries, in inventoried roadless areas may not be subject to the prohibitions, it would depend on the type of project and method of construction." FEIS Volume 3, Response to Comments, Page 115. Ski area operations can be compatible with roadless protection and should not be expressly prohibited. (Permit Holder, No Address - #A5285.90810)

The agency should recognize the unique role of ski areas in its decision-making on roadless protection. Resorts need flexibility is particularly necessary in the context of roadless protection and is justified on many levels: (1) we currently accommodate over 30 million skier visits on less than one-tenth of one percent of NFS lands; (2) Recreation visits on the national forests are expected to increase in the future as a result of demographic and population shifts, and as quality of life becomes a high priority for the public. Ski areas experienced a record season in 2000/2001 with over 57.3 million skier visits; (3) In addition to increased quantitative demands for recreation, there is now increased public demand for diversified and year-round recreational activities at ski resorts, as well as new and varied terrain, better and faster circulation, and reliable and consistent snow conditions. Ski areas must have the flexibility to make improvements to address these emerging trends. (4) By necessity, resort improvements must be adjacent to or connected to existing improvements. Ski areas make significant, long-term capital investments on National Forest land, and are locked in place by virtue of these investments. We do not deal in interchangeable commodities that can be obtained elsewhere on the forest. (5) Ski area roads are essential to the completion of ski area improvement and development projects, as there is no practical or economically feasible substitute for road building in the context of ski area development. (6) When we do construct roads in new areas, their impacts are limited as thorough analysis is conducted, mitigation is performed, the roads are short in length, and they are used for limited or temporary purposes such as construction, maintenance or service, access or emergencies. 7) Finally, resorts are uniquely situated in that we help enhance the public's appreciation for the natural environment and the very values that the agency seeks to protect through roadless management. All of these factors should be taken into account in the agency's analysis of the future course of roadless protection. (Permit Holder, No Address - #A5285.90910)

#### **DUE TO GROWING DEMAND FOR OUTDOOR RECREATION**

Nationally, ski area operators accommodate more than 30 million forest visits on less than one-tenth of one percent of the total inventory of NFS lands. U.S. ski areas had a record season in 2000/2001 with over 57.3 million skier visits—both public and private lands. Recreation visits on the national forests are expected to grow as a result of demographic and population shifts, and as quality of life continues to be a high priority for the public. Nationally, ski area capacity will need to expand to accommodate the growing demand for outdoor recreation.

It is important to remember that land suitable for the development of alpine ski and snowboard terrain is limited. Topography, slope gradient requirements, solar and wind exposure, avalanche hazard, fish and wildlife habitat requirements, cultural resources, and vehicular access are just a few of the myriad issues that constrain the suitability of lands for ski area development. As a consequence, ski area operators of the Pacific Northwest support the development of appropriately suited terrain that is contiguous to existing ski areas. Relying upon the USFS policy that gives existing SUP holders the opportunity to expand their operations to meet increasing public need—rather than the conversion of raw land for the development of new ski areas—Pacific Northwest ski area operators have invested hundreds of millions of dollars into existing ski area facilities. Operators have done so with the goal of remaining competitive in local and regional ski markets—both in the short- and long-term. (Permit Holder, Hood River, OR - #A13230.90810)

#### **BECAUSE SKI AREA OPERATIONS CAN BE COMPATIBLE WITH ROADLESS PROTECTION**

It is the ski industry's view that parcels adjacent to existing developed recreation sites should not be designated "roadless," as they may have some, but not all, of the characteristics commonly associated with roadless areas. If such adjacent parcels are designated as roadless, forest planning guidance or

directives should clarify that for planning purposes, it should be assumed that ski area operations could be compatible with roadless management. Even the agency's Final Environmental Impact Statement (FEIS) on Roadless Area Conservation, issued in November 2000, acknowledged that "new ski areas, or expansions of existing ski areas outside existing special use permit boundaries, in inventoried roadless areas may or may not be subject to the prohibitions; it would depend on the type of project and method of construction." (FEIS Volume 3, Response to Comments, Page 115) Ski area operations can be compatible with roadless protection and should not be expressly prohibited. (Permit Holder, Hood River, OR - #A13230.90810)

The right to enjoy one's own property within a Roadless designation area must be preserved. Going beyond that, even if property is not currently owned by an individual, the access to that land must be made available to the public for their use. The Forest Supervisor and District Ranger must be given the ability to review proposals which may allow public use of areas marked for IRA with potential new road construction. You must incorporate into the Roadless document that if potential use of the land is not outside of acceptable environmental concerns, then the land shall be given the opportunity to further enhance the benefit to the general public. A case in point could be the ability for a resort such as ours to utilize such land to improve the public's interaction with the environment. As is mentioned in the Forest Service FEIS on Roadless Area Conservation, "**New ski areas, or the expansions of existing ski areas outside existing special use permit boundaries, in inventoried roadless area may or may not be subject to the prohibitions; it would depend on the type of project and method of construction.**" In essence, ski area operations can be compatible with roadless protection thus enabling improved access to public land. (Business, Twin Bridges, CA - #A8808.40000)

#### **EXPANSIONS THAT DO NOT REQUIRE ROAD CONSTRUCTION**

Another point that needs clarification is the expansion of resorts and recreation facilities outside of special use permit boundaries and into IRAs. While the proposed rule deals with the construction and reconstruction of roads in the IRAs, it leads one to believe that expansion and construction not requiring roads will be prohibited. This should simply not be the case. 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 IRAs. The proposed rule should be modified to clearly state that the policy pertains only to road construction or reconstruction and that ski area expansion outside of permit boundaries into IRAs could be authorized if there is no road construction needed. (Business, Mammoth Lakes, CA - #A30296.90810)

### **1200. Public Concern: The Forest Service should permit ski area expansion in certain areas.**

#### **IN THE EASTERN SIERRA**

The FEIS states that the opportunities for future developed recreation would decline if the preferred alternative is selected. There is some discussion that additional impacts will occur at existing developed and road dependent recreation facilities, but there is no disclosure as to what the impacts will be, how the Forest Service plans to deal with increased use at existing facilities, what type of expansions of existing facilities will be authorized, and so on. This is of particular interest to DCC, since the FEIS states that no additional expansion of ski areas shall be allowed outside of existing permitted boundaries. In the case of the Eastern Sierra, communities have been developing in anticipation of Forest Plan decisions being enacted. As stated in the FEIS, demand is increasing for dispersed activities, but it is also increasing for developed and road dependent recreation. If there is no opportunity for expansion of facilities, the opportunity to manage developed recreation sites will diminish. The INF planning process took this future-planning element into consideration and provided the flexibility that was needed. (Business, Mammoth Lakes, CA - #A30296.90100)

#### **IN THE GRANITE MOUNTAIN/SLAB BUTTE AREA OF THE PAYETTE NATIONAL FOREST**

It has long been our position that a tract of land on the Payette N.F. needs to be recognized as having potential for ski area development. We would like to take this opportunity to again suggest that a portion

of the Granite Mountain/Slab Butte area be recognized in the forest plan for this purpose. Ski area operations can be compatible with roadless protection. (Permit Holder, McCall, ID - #A15317.91210)

#### **PELICAN BUTTE**

This is difficult for me to assess. I have mainly become familiar with the issues surrounding Pelican Butte, and in accordance with the vast majority of citizens from this county, I believe that there is likely to be little environmental impact on Pelican Butte or the surrounding areas with the proposed development of Pelican Butte into a ski-destination. (Individual, Klamath Falls, OR - #A6931.50000)

In my opinion, the Jeld-Wen corporation's proposal to develop the most environmentally conscientious ski-destination in the history of skiing in the U.S. on Pelican Butte is NOT a major imposition on the wilderness as it only represents 1/10,000th or 0.01% of the total Clinton "Roadless ban." Furthermore, it has been estimated by some biologists that such a development would actually enhance wildlife in the area of Pelican Butte, particularly elk and deer that rely on open meadows for higher quality food. (Individual, Klamath Falls, OR - #A6931.53200)

In a prospective fashion, the Jeld-Wen Corporation, with whom I do not have any financial interest, has already drawn up a very elaborate plan to develop Pelican Butte into the most environmentally conscientious ski-destination in the country. This has been with the input of wildlife biologists, the Forest Service, local citizens, local Indian tribes, and ski-consultants. This has included proposals for underground passage-ways for animals to cross ski-runs, a high gondola which passes over rather than through old-growth forest, the avoidance of ski runs in old growth forest, minimal snow-making near the base of the hill, withholding from ANY hotel development at the base of the hill, and implementing a small sewage treatment plant specifically for the day lodges on the hill in order to prevent any water contamination issues. The net result is that Jeld-Wen has spent up to \$4,000,000 simply developing an environmental impact statement and proposing a plan for the development of Pelican Butte. While some radical environmentalists may contend that there can be no compromise concerning Pelican Butte, we must remember that the ski-destination proposal only includes 3000 acres that only represents 1/10,000th of the "Roadless ban" area. (Individual, Klamath Falls, OR - #A6931.90810)

#### **SIPAPU**

An Executive Order on the Roadless Initiative will:

1. Overturn the Public Law 96-550 enacted by the 96th Congress December 1980.
2. Be contrary to the 1986 Carson National Forest Plan concerning Sipapu Ski area.
3. Negate 15 years of work and expense by the Forest Service and Sipapu in developing an EIS for ski area expansion.
4. Be an environmental injustice by creating economic and social hardships on the poorest countries in northern New Mexico.
5. Circumvent the right for appeal.

Public Law 96-550 enacted by the 96th Congress December 1980.

The purpose of the act is very specific with its main points:

1. Designate certain National Forest lands to be included in the National Wilderness Preservation System.
2. Insure certain uses including but not limited to campground and other recreation site development, timber harvesting, intensive range management, mineral development and watershed and vegetation manipulation.
3. Designate certain other National forest system land in NM for further study in furtherance of the purpose of the Wilderness Act.

The land surrounding the ski area was not included as wilderness lands, not included for further study and was included in other lands promptly available for nonwilderness uses.

The EIS for the Carson National Forest Plan, completed in 1986, is in accordance with Public Law 96-550 and designated management area 15 for ski area expansion. (Permit Holder, Vadito, NM - #A28970.45624)

## ***Do Not Allow/Restrict Ski Area Development***

### **1201. Public Concern: The Forest Service should not allow ski area expansion.**

I live in Ogden, Utah, and frequently visit the Wasatch-Cache National Forest, with which I know you are familiar. The Ogden Ranger District contains much developed area (Pineview Reservoir, Snowbasin Ski Area), much undeveloped roaded area (Monte Cristo Plateau), and still a fair amount of inventoried roadless area. I am sad to remind you, however, that the nearest roadless area to central Ogden was recently encroached upon by the expansion of Snowbasin into Strawberry Bowl, an expansion that was fraudulently claimed to be necessary for the 2002 Olympics.

Let me repeat: The most recent encroachment into a roadless area near here was made not for the purpose of fire prevention, . . . and not even for the purpose of resource extraction. It was made for the purpose of commercial profit by one of the wealthiest men in Utah, who is attempting to capture a greater share of the nation's stagnating downhill skiing market. He was supported in this attempt by many local elected leaders, who felt that bringing more tourists to Utah might help the local economy. Obviously these local leaders are unconcerned with the fact that an increase in tourism here might lead to a decrease in tourism somewhere else. Meanwhile, polls showed that Ogden's about half in favor of the Snowbasin resort development and half against.

Now another local ski area, Nordic Valley, is proposing to expand onto 2000 acres of inventoried National Forest roadless area.

It is in situations like this that we need to rise above local interests and take a national perspective. The national interest is not served by ski area expansions that merely try to attract tourists to a particular ski area at the expense of others. Also, ski area expansions on public land come at the expense of the American taxpayer, who pay the salaries of the many Forest Service employees who work full time to monitor ski area activities and try to mitigate their environmental damage. And the environmental damage that does occur exacts a price on us all, as watersheds are polluted and more plant and animal species become endangered throughout the United States. (Individual, Ogden, UT - #A30511.15122)

#### **OUTSIDE OF CURRENT SKI AREA PERMIT BOUNDARIES**

The Roadless Policy allows ski areas to expand (many significantly) within ski area permit boundaries - only expansions outside of these areas would be curtailed. With skier numbers essentially stagnant for three decades, it makes little sense to permit further expansions into these undisturbed areas, such as at Beaver Creek, Breckenridge and Vail in Colorado, Mammoth Mountain and Heavenly in California, and Snowbird and Snowbasin ski areas in Utah. (Individual, Alta, WY - #A19643.90820)

#### **BECAUSE THERE IS NO NEED FOR EXPANSION**

Skiing is not an activity that has increased in number in the past years and I believe the numbers of resorts now available for this purpose is quite adequate. There is no need for expansion. (Individual, Lake Oswego, OR - #A4615.90820)

### **1202. Public Concern: The Forest Service should not allow ski area expansion in certain areas.**

#### **IN CALIFORNIA**

Ski area developments should also be banned from roadless areas, such as Sherwin and Mammoth/June Lakes in my home state of California. These developments also degrade the health and beauty of the environment while using the claim of "meeting recreational demand" to hide the real goal of attracting lucrative real estate investments. New ski area construction or expansion should not be given any special exemptions in your final policy. (Individual, Auburn, CA - #A30708.90820)

### **1203. Public Concern: The Forest Service should review ski use permits and manage such areas in a more restrictive manner.**

I want ski resort use permits to be carefully reviewed and managed in a MORE RESTRICTIVE fashion. (Individual, Salt Lake City, UT - #A4902.90110)

The Forest Service has recently expanded the use permits for the Snowbird Resort to add facilities, roads, ski lifts, and other development on a previously roadless area to the south of their previously existing ski runs. This permit and agreement is in place. However, the Forest Service officials here in the Wasatch National Forest can and should take a MUCH HARDER LINE with this development. No further activity on my public land should be allowed until the local Forest Service Administrators completely review all the existing terms and conditions for compliance. (Individual, Salt Lake City, UT - #A4902.90820)

## **Hunting and Fishing**

### **Summary**

**General Comments** – Some assert that among the values to be considered during roadless area evaluations, hunting and fishing values should be included. Beyond that, most general comments on this topic address management activities which respondents say will enhance hunting and fishing. Several respondents request that the Forest Service protect roadless areas, both to maintain game species habitat and to prevent hunting behavior problems associated with motorized access. One organization states that, according to a study on the topic, “The use of motor vehicles associated with hunting rose to the top of the bad behavior analysis.” Others assert simply that hunting is better in roadless areas. One individual remarks, “Designated roadless areas and other areas with low densities of roads are often attractive to big game for the security they offer and thus make for the best areas to hunt.”

Some believe that the Forest Service should not decommission existing roads because, they say, roaded access is needed for hunting. One individual adds, “I am an outdoorsman and I use the National Forests a lot. It has become very difficult to hunt in many of our forests as it is. A large animal, such as an Elk, is impossible to get out of the woods on foot in many areas.” Likewise, others urge the Forest Service to allow timber removal for habitat management in order to maintain quality hunting and fishing. Finally, one individual suggests that hunting and fishing licenses ought to be issued by the federal government, rather than individual states, to ensure consistency.

**Funding** – A few individuals assert that the Forest Service should use the fees collected from hunters and anglers to benefit hunters and anglers. One person remarks, “Please respect the fact that hunters and anglers pay money to manage our wildlife and it should benefit them the most.”

**Hunting and Fishing** – A number of respondents who address hunting and fishing, say it should be allowed in roadless areas. Several ask the Forest Service to keep the “heritage and traditions” associated with hunting and fishing “alive and well for years to come.” Some suggest these activities should be allowed because people depend on the food they obtain from hunting. One person suggests retaining free access for these activities. Others mention specific types of hunting and fishing they say should be allowed to see continue, including mountain lion hunting, commercial fishing, trapping, and sport shooting.

Other respondents believe that the Forest Service should prohibit hunting in roadless areas. “Hunters kill wildlife,” asserts one individual. “This is not conducive to areas functioning as

biological strongholds and wildlife refuges.” Another says, “Bear baiting should not be allowed anywhere, period.”

Some respondents direct their comments specifically to trapping. One individual states, “I would be in favor of having [roadless areas] remain open for all legal purposes, including hunting, fishing, and trapping.” Others who address trapping assert that it is not well regulated and restrictions are poorly enforced. According to one individual, “It is not uncommon in states with regulations and in states with none, for an animal to be left in a trap for weeks because the trapper does not check the trap.” Others concur that trapping is not effective for wildlife management as “it does not ensure stable, healthy wildlife populations.” Rather, “natural ecological factors such as weather and food supply, as well as wild animals’ innate ability to limit their populations through natural means, are sufficient to create a balance between wildlife populations and their habitats.” Some also suggest that hunting with dogs be prohibited because, they say, the dogs are not adequately kept under control.

A few individuals suggest that the Forest Service regulate hunting, particular hunting that damages predator-prey dynamics. One suggestion is to regulate the number of tags sold. Some also suggest closing off-road vehicle trails to hunters and prohibiting fishing in roadless areas containing endangered species.

### *Hunting and Fishing General*

#### **1204. Public Concern: The Forest Service should consider hunting and fishing values.**

Fishing and hunting values and traditions are deeply held in the United States and must be considered in decisions that affect the roadless areas in the forests and grasslands - the nation’s best remaining fish and wildlife habitat. (Individual, No Address - #A4553.54100)

#### **1205. Public Concern: The Forest Service should require that hunting and fishing licenses be issued by the federal government.**

I think that hunting and fishing licenses should be federal and not state and the same for everyone, like federal parks. (Individual, Danbury, WI - #A7242.91310)

#### **1206. Public Concern: The Forest Service should protect roadless areas.**

##### **FOR GAME SPECIES HABITAT**

Roadless areas are crucial to protect habitat security and maintain ample hunting opportunity for elk, deer, bighorn sheep, mountain goats and other game.

Loss of roadless areas would cause Montana’s five-week elk season to collapse, as it did on Idaho’s Targhee National Forest, where elk seasons plummeted from 44 to 5 days after intensive logging and road building.

To sustain Montana’s elk hunting traditions, the state of Montana’s 1992 Montana Elk Management Plan pledges that the state will: “promote maintenance of key unroaded areas that provide important elk security and offer backcountry or roadless recreation.” (Organization, Helena, MT - #A21370.53100)

##### **TO PREVENT HUNTING BEHAVIOR PROBLEMS**

Montana is a state that prides itself on its wild nature and the opportunities available for hunting on that wild estate. It is wild land resource that has already been reduced by 88% statewide. Today, we seem perched on the brink of degrading the hunt into some form of drive-by-shooting with the excessive road systems that already exists on public lands and now machines ranging beyond the roads themselves.

In 1998 the Montana Fish, Wildlife and Parks Commission convened a Hunter Behavior Advisory Council to: *identify, define and recommend solutions to hunting behavior problems in Montana*. I served on that council. As part of our work we solicited the public's opinions on hunter behavior. Part of that solicitation encouraged people to address any issue they chose. The use of motor vehicles associated with hunting rose to the top of the bad behavior analysis. When this council developed a list of guiding principles conducive to positive hunting behavior and experiences one was:

*"Land and wildlife management agencies have a responsibility to provide hunting environments that encourage ethical behavior."*

The council further urged Montana Fish, Wildlife and Parks to:

"Encourage federal land managers to address hunter behavior and fair chase considerations in travel management programs."

It would seem that both of these items would be addressed through the adoption of a rule preventing the loss of our last roadless wild lands. I encourage you to avail yourselves of the recommendations of the report. (Organization, Helena, MT - #A2940.53300)

### **1207. Public Concern: The Forest Service should address the negative effects of roads on game species.**

Hunting as a result of road building is improved for a few years. In the long term, hunting success always decreases as a result of roads. Hunting the fringes of our islands provides a refuge for SE Alaska's abundant game species, such as Sitka black-tailed deer, black and brown bears, mountain goats, and moose. (Individual, Juneau, AK - #A23242.53300)

I have been an avid bow-hunter for 18 years, and have bow-hunted for elk, deer, and bear on National Forests and other public lands in WA, NV, ID, MT, and ND. By and large most of the better hunts occurred in areas that were absent of roads. Designated roadless areas and other areas with low densities of roads are often attractive to big game for the security they offer and thus make for the best areas to hunt. I am all in favor of limiting development of new roads, and even more supportive of closing old 'spur' roads that are no longer needed for timber harvest. (Individual, Stanley, NJ - #A4004.90310)

### **1208. Public Concern: The Forest Service should not decommission existing roads.**

#### **BECAUSE ROADED ACCESS IS NEEDED FOR HUNTING**

I am an outdoorsman and I use the National Forests a lot. It has become very difficult to hunt in many of our forests as it is. A large animal, such as an Elk, is impossible to get out of the woods on foot in many areas. I don't believe that all of the little logging roads should be open for travel, but a small percentage would make using the forests much more enjoyable. If more forest roads are closed then this will deter a large percentage of current users from going to the out-of-doors. There are already hundreds of thousands of acres of wilderness areas that have no roads. I don't believe we need any further restrictions on the use of "our land." Not everyone can or wants to hike to see the forest. Not everyone wants to ride a horse, rent a horse, or own a horse. Let's be fair to everyone, even the people who own quads, jet skis and trail bikes. (Individual, No Address - #A724.90320)

There are many people who are not hunters that contribute to the overall planning and success of our use of public lands. The anti-hunter groups want to believe that the worst thing that can happen to the forestland is to let hunters use it. These biased opinions are long in rhetoric and short on truth. It is the hunters who generate the most revenue for the continuation of public lands and natural habitat.

I am not asking you to build new roads into our forestlands. What I am asking is for you to not take anything away that is already there. I'm not even asking you to do any upkeep on the trails and roads that have [been] established by the logging industry. What I am asking you to do is to keep the existing, legal roads open for all to enjoy. If there is a logging road that is not designated "just don't keep it up"

let it go back to its natural habitat. I don't mind walking a little for the pure enjoyment of my hunts or camping trips (Individual, Las Cruces, NM - #A5434.91310)

### **1209. Public Concern: The Forest Service should allow timber removal for habitat management.**

#### **TO MAINTAIN QUALITY HUNTING AND FISHING**

Our major concern lies with the decisions that affect the White Mountain National Forest that occupies approximately thirteen percent of the State of New Hampshire. We see an annual a loss of about twenty thousand acres of forest and field to development across the State. As this trend continues there is an ever increasing demand for outdoor recreational activities, including hunting and fishing on our public lands. There is a simultaneous effort on the part of some individuals and groups to reduce the opportunity for quality hunting or related wildlife enjoyment by removing the opportunity to manage vegetation in a way that enhances habitat quality for a majority of the game and non-game species found in New Hampshire and in the White Mountains. Over fifty percent of the White Mountain National Forest, under its current management plan, has been withdrawn from vegetative management. The roadless areas designation process has the potential to significantly increase that percentage as part of the current revision process. It is imperative that the ability to manage habitat through the use of commercial timber sales and through non-commercial applications be retained on these lands if the future needs of the wildlife enthusiasts in New Hampshire are to be met. (State Agency, Concord, NH - #A28779.45612)

### *Funding*

### **1210. Public Concern: The Forest Service should use the fees collected from hunters and anglers to benefit hunters and anglers.**

Please respect the fact that hunters and anglers pay money to manage our wildlife and it should benefit them the most. (Individual, Jefferson, OR - #A7985.91310)

In Michigan the DNR just are not getting things done. License fees go up and still nothing. Where are the hunters and fishermen's' funds going?

It should go to help hunters and fishermen. Not to build walkways for the gen. public, and slush funds, and all the other bull. If it gets worse, I will ask sportsmen to boycott License fees for at least one year or more depending on the outcome of the first year. (Individual, Au Gres, MI - #A11048.17120)

### *Allow Hunting and Fishing*

### **1211. Public Concern: The Forest Service should allow hunting and fishing.**

I implore you, as an avid hunter and fisherman, to keep the heritage and traditions of my enjoyments alive and well for years to come. Being in my early twenties and having many years ahead to look forward to enjoying the outdoor sports I love so much, please allow my tax dollars to not be wasted by hindering access to so many acres of land that my children and myself can someday enjoy. (Individual, Hudsonville, MI - #A3931.91310)

I am in favor of allowing hunting and fishing, within state-mandated legal limits, on all federally owned lands, including national parks. (Individual, Waco, TX - #A3956.91310)

Hunters and shooters need a place to go. Do not close off the forest to hunters and vacationers. (Individual, Pinole, CA - #A4189.91110)

I wish to be counted among the hunters and anglers who believe you should scientifically manage all fish and wildlife habitat in the National Forest System as valuable lands that will remain open to HUNTERS, ANGLERS, and other private citizens. I have the hope someday to bring my son to some of these areas that the monies I spent and helped raise through my efforts with Ducks Unlimited and license fees. (Individual, West Salem, WI - #A4957.91110)

We should keep the roads already in place, manage the wildlife as to what is best for all. Hunters and fishermen should be given first and top consideration in this as our dollars provide most of the funding. We also are the people who use and care for the land, waterways, and wildlife the most. (Individual, Hemet, CA - #A4313.15123)

#### **BY MAINTAINING FREE ACCESS**

Keep new roads out of prime habitat. Retain free access to hunting land and small lakes. New roads, NO! Keep our waters clean, our lakes free from polluted practices. New roads bring excessive pressure and “dirty” our clean waters. (Individual, Saint Cloud, MN - #A7468.50000)

#### **IN WILDERNESS AREAS**

I think that the holding of wilderness lands in the public trust is an excellent idea, providing that it remains open to hunters and fishermen. It is my opinion that these interests have long provided a significant source of conservation revenue and activities should be given access to engage in the pursuit of their passions. (Individual, No Address - #A12665.91310)

#### **BECAUSE PEOPLE DEPEND ON THE FOOD THEY OBTAIN**

As a hunter and fisherman I would like you to know that that’s how I put food on the table. I don’t do it just for fun or for the sport of it like some people I know. I hunt because it’s a lot cheaper than buying meat at the store.

If you close down the public lands, where would I go to hunt for food? A lot of people don’t have their own land to hunt on so they have to make do with what they have, and if you take that away you will have a lot more car wrecks because there would be no one to hunt the wildlife to keep the population down.

In my opinion and my friends’ opinion it would be just stupid to close public land to hunting and fishing. (Individual, Bethlehem, GA - #A7957.91310)

### **1212. Public Concern: The Forest Service should allow hunting and fishing.**

#### **MOUNTAIN LION HUNTING**

Hunters/hunting is the #1 proper tool for control of a species and I feel more hunting of Mountain lions should take place. (Individual, East Granby, CT - #A11510.90000)

#### **COMMERCIAL FISHING**

As a community that is directly dependent on a commercial fishing economy, a specific activity that should be allowed is commercial fishing in waters adjacent to the IRA. (Organization, Cordova, AK - #A23229.91310)

#### **TRAPPING**

With respect to uses of such land, I would be in favor of having it remain open for all legal purposes, including hunting, fishing, and trapping, for example. (Individual, West Swanzey, NH - #A15665.90100)

#### **SPORT SHOOTING**

I also believe that forests should be open for sports shooting as well as hunting. (Individual, Lafayette, CO - #A7448.90100)

**1213. Public Concern: The Forest Service should manage fish and wildlife habitat as valuable lands that should remain open to hunters and anglers.**

Convince the Bush Administration, elected officials and public land managers to scientifically manage all fish and wildlife habitat in the National Forest System, whether roaded or unroaded, as valuable and unique lands that will remain open to hunters, anglers and other public users. Balance accessibility to National Forest lands, with the year round requirements of fish and wildlife (habitat, clean water, food, shelter, open space and disturbance management), while maintaining a functioning forest road system, including keeping roadless areas roadless (with science-based exceptions made for forest health, restoration, and other national needs). (Individual, Lyons, NY - #A1737.50000)

Count me among the hunters and anglers who believe you should scientifically manage all fish and wildlife habitat in the National Forest System as valuable lands that will remain open to hunters, anglers and other private citizens. (Individual, Mosinee, WI - #A5176.53100)

**1214. Public Concern: The Forest Service should open closed roads for bear hunters.****IF THEY ARE OPENED FOR DEER HUNTERS**

I think if you are going to open bars on closed roads for deer hunting, you should leave them open for bear hunters also. This could bring a discrimination issue to attention. (Individual, Ronceverte, WV - #A10801.91310)

***Do Not Allow/Restrict Hunting and Fishing*****1215. Public Concern: The Forest Service should prohibit hunting in roadless areas.**

Hunters kill wildlife. This is not conducive to areas functioning as biological strongholds and wildlife refuges. Forest Service studies show over 65% of all sensitive species are directly or indirectly affected by roadless areas, including 81% of mammals and 82% of birds. I believe prohibiting hunting in IRAs would affect very few people; during the seven years I worked for the USFS, I rarely met hunters who went very far from a road. (Individual, Vista, CA - #A4838.91320)

Bear baiting should not be allowed anywhere, period. (Individual, Shawnee Mission, KS - #A96.90110)

Prohibit killing animals except in cases of specifically approved, publicly announced efforts to reduce herd size. (Individual, Atlanta, GA - #A873.90110)

**WITHIN TWO MILES OF PRIVATE PROPERTY**

Hunting should be prohibited for 2 miles around any private residence. Hunting with dogs should be forbidden in any US Forest. (Individual, Marion, NC - #A4691.91320)

**BECAUSE IT IS NOT WELL REGULATED AND RESTRICTIONS ARE POORLY ENFORCED**

Trapping is largely unregulated, and where restrictions do apply, they are poorly enforced. Most states require that traps be checked every 24 hours, but eight states (Idaho, Montana, Nevada, Oregon, South Dakota, Utah, Washington, and Wyoming) allow a lapse of two or three days; five states (Alabama, Alaska, Kansas, Michigan, and North Dakota) have no trap-check requirements. It is not uncommon in states with regulations and in states with none, for an animal to be left in a trap for weeks because the trapper does not check the trap. (Very few people trap full time, most trap in their spare time). In most cases trappers do not leave identification on their traps, so trappers cannot be traced or fined for neglecting their traps. Many trappers' regulations clearly benefit trappers. It is legal to set traps near schools, neighborhoods, and hiking trails, where they clearly are a safety hazard. In many states it is illegal to disturb a trap in any way, even to release a trapped dog, or cat. Only 15 states require any form

of trapper education. The fur trade has nearly caused the extinction of fishers, martens, and several species of wild cats. (Individual, Topeka, KS - #A12789.90420)

**BECAUSE IT IS NOT EFFECTIVE FOR WILDLIFE MANAGEMENT**

Trapping Does Not “Help” Wildlife. Supporters often claim trapping can be used for wildlife management and to control disease and “nuisance” wildlife. These claims are false.

Trapping is not wildlife management. It does not ensure stable, healthy wildlife populations. Trappers claim that they are simply “harvesting” those animals that would die anyhow. However, natural ecological factors such as weather and food supply, as well as wild animals’ innate ability to limit their populations through natural means, are sufficient to create a balance between wildlife populations and their habitats. Nonetheless, trappers are permitted in some states to catch species, such as the lynx and river otter, whose populations are low. Moreover, there is some indication that healthy animals—who are more active than diseased or otherwise weak animals—are more likely to be caught by traps. Thus, trapping is harmful to animal populations because it removes healthy animals and leaves behind those who are sick. (Individual, Topeka, KS - #A12789.90420)

**1216. Public Concern: The Forest Service should prohibit hunting in roadless areas.**

**WITH DOGS**

All citizens deserve to be able to use roadless areas without being harassed or endangered by uncontrolled packs of hunting dogs. Bear hunters use radio collars to track dogs and do not accompany them or have control over the behavior of these dogs. We have had our entire poultry flock massacred several years in a row. Our horse has been attacked and injured each year. My child was attacked and injured. Bear hunters have threatened to burn people’s homes if they complain about the trespassing and abuse of their dogs. Bear hunters have threatened our county commissioners if they attempt to curtail the abusive and dangerous activities of the bear hunters. There should be no hunting allowed in the US Forest with dogs. (Individual, Marion, NC - #A4691.91320)

**TRAPPING**

Please also prohibit all trapping activities in “roadless” areas of those same national forests. You must know that all humane organizations in this country, not to mention some other 89 countries and at least 7 of our States banned the cruel, steel-jawed leg-hold traps. They must not be allowed in our national forests. (Individual, Norfolk, VA - #A6957.90110)

NO trapping or hunting—especially NO steel-jawed traps that have been banned practically worldwide. (Individual, Merritt Island, FL - #A6906.90110)

**1217. Public Concern: The Forest Service should prohibit fishing in roadless areas.**

**IN AREAS WITH ENDANGERED SPECIES**

Local forester input would be very useful on this subject, prohibitions should be established that would best protect depending on the potential risk of damage to a particular area, i.e. no fishing in endangered species areas, fire bans in dry areas, no bikes in erosion prone areas, etc. (Individual, No Address - #A8998.90000)

**1218. Public Concern: The Forest Service should close off-road vehicle trails to hunters.**

Open more trails for ATV users and close these trails to ATV hunters during hunting season. (Individual, Saint Paul, MN - #A10994.90000)

**1219. Public Concern: The Forest Service should regulate hunting.****BY REGULATING THE NUMBER OF TAGS SOLD**

Wildlife also needs to be preserved and I think it is possible to manage both with the extinction of none. Hunting laws need to be looked at too. Many times too many tags are sold and at others, not enough of one kind are sold. Money should not be the consideration with the sale of tags. (Individual, Oak City, UT - #A40530.90000)

**FOR HUNTING THAT DAMAGES PREDATOR-PREY DYNAMICS**

Activities that deplete on wildlife within roadless areas can damage the proper functioning of a forest ecosystem. Activities like hunting wolves from helicopters or cougars with hounds can have extremely detrimental impacts on a system. The noise alone can form an auditory habitat fragmentation, not to mention the impact from the hunting on predator-dependent species and their populations (such as elk populations that explode when wolves are removed). Such activities that damage the predator-prey dynamics of a system shouldn't be allowed in roadless areas. Those areas should truly be reserved areas and all things therein should be protected, not just the trees. (Individual, No Address - #A29243.90110)

**Outfitter-Guides****Summary**

A few respondents write that commercial outfitters should be allowed in roadless areas. One Permit Holder requests that the Forest Service implement the Roadless Area Conservation Rule because it will benefit outfitter-guides. According to this respondent, "We have operated under special use permit on the Tongass for nearly 40 years and have experienced a 60% loss of suitable areas to conduct our business as a result of clear-cut logging. Continuing the roadless rule would stabilize this loss for our continued business operation. Another respondent urges the Forest Service to prohibit commercially directed group tours and expeditions. While on person states that it is wrong "that outfitters have the right to charge outrageous fees while using 'Public' lands!"

***Allow Outfitter-Guides*****1220. Public Concern: The Forest Service should allow commercial outfitters in roadless areas.**

The Forest Service should consider the following when evaluating roadless areas.

Allowing non-intrusive commercial use (such as outfitting). (Individual, Bozeman, MT - #A3673.91216)

**1221. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule.****BECAUSE IT WILL BENEFIT OUTFITTER-GUIDES**

Please do not roll back the National Forest Roadless ruling. We have operated under special use permit on the Tongass for nearly 40 years and have experienced a 60% loss of suitable areas to conduct our business as a result of clear-cut logging.

Continuing the roadless rule would stabilize this loss for our continued business operation. (Permit Holder, Gustavus, AK - #A1716.10150)

## *Do Not Allow/Restrict Outfitter-Guides*

### **1222. Public Concern: The Forest Service should prohibit commercially directed group tours and expeditions.**

Also incompatible with roadless value protection are . . . commercially directed group tours/expeditions. (Individual, Port Angeles, WA - #A6179.91120)

### **1223. Public Concern: The Forest Service should prohibit outfitters from charging large fees for using public lands.**

I strongly object that outfitters have the right to charge outrageous fees while using "Public" lands! (Individual, Bennett, CO - #A11158.91226)

## **Equestrian Use**

### **Summary**

Some respondents commenting on equestrian use, say it should be allowed in roadless areas, both in the form of horseback riding and in the use of pack animals. One recreational non-motorized organization requests that the Forest Service allow users to transport horses to existing trailheads in order to accommodate the "short, single-day rides" enjoyed by most recreational horse trail riders. Other respondents assert that the Forest Service should prohibit equestrian use, both in the form of horseback riding and in the use of pack animals.

### *Allow Equestrian Use*

### **1224. Public Concern: The Forest Service should allow equestrian use in roadless areas.**

#### **HORSEBACK RIDING**

I fully support protecting our nation's natural resources. I am an equine trail rider and believe in the "leave-no-trace" philosophy. I also believe I have the right to celebrate this nation's cultural heritage by riding a horse across our public lands and can do it without harm to our environment. (Individual, Long Lane, MO - #A1060.91215)

#### **PACK ANIMALS**

Activities that should be allowed: hiking and camping, non-motorized recreation, hunting and fishing, and horse and llama pack trips. (Individual, Rogue River, OR - #A15590.90100)

### **1225. Public Concern: The Forest Service should allow users to transport horses to existing trailheads.**

The American Horse Council submitted comments in the past expressing our concerns that the needs of the recreational horse trail rider have been often ignored in national forests. Issues such as closure of equine trails, adequate parking at trailheads to accommodate horse trailers and safe stabling areas for horses at campgrounds have not always been addressed.

While there is a portion of the horse industry that enjoys lengthy, multiple-day rides, the majority of the recreational horse trail riders participate in relatively short, single-day rides. The type of riding enjoyed by most riders requires facilities for trailer parking and preparation of both horse and rider. Very few riders have the luxury of beginning a trail ride off-site. Most must transport their animals and gear to a trailhead before beginning the actual ride.

These riders are concerned that if the Forest Service (FS) bans new road construction, there may be perfectly legitimate areas where individuals could ride horseback, but they will never have the

opportunity to do so because of the inability to transport their animals to a trailhead. (Organization, Washington, DC - #A23320.91215)

**1226. Public Concern: The Forest Service should preserve equestrian access in roadless areas.**

**THROUGH MAINTENANCE AND MAPPING**

Provide maintenance and maps for equestrian trails. (Individual, Sandy, UT - #A11009.91110)

**1227. Public Concern: The Forest Service should allow historical and recreational pack and saddle stock use.**

**AS ALLOWED UNDER THE WILDERNESS ACT**

Any new designations must not interfere with the original intent of the Wilderness Act and subsequent laws which include historical and recreational pack and saddle stock use, as public purposes equal in importance to the four public purposes specified in the Wilderness Act. (Individual, Bakersfield, CA - #A15786.20206)

*Do Not Allow/Restrict Equestrian Use*

**1228. Public Concern: The Forest Service should prohibit equestrian use.**

**HORSEBACK RIDING**

Snowmobiles, ATVs, other off-road vehicles, motorized boats, and animal travel including dog sleds and horseback riding should be severely restricted. (Association, Minneapolis, MN - #A19249.90110)

**PACK ANIMALS**

Commercial logging, mining, oil drilling, ORV use, and pack animals should be banned in all roadless areas. (Individual, No Address - #A12601.90110)

**IN THE SHAWNEE NATIONAL FOREST**

No . . . equestrian operations in Shawnee National Forest. (Individual, Glencoe, IL - #A21487.90110)

**Camping/Shelters/Accommodations/etc.**

**Summary**

**General Comments** – A few individuals ask the Forest Service to address privatization of forest facilities such as campgrounds, and to reevaluate “the use of private companies on the campgrounds who are charging for the use of public lands.”

**Camping/Shelters/Accommodations/etc.** – Several respondents state that camping should be allowed in roadless areas; one person suggests expanding the present facilities to alleviate crowding. Some ask the Forest Service to allow the construction and maintenance of Adirondack shelters in roadless areas; to provide shelters for maintenance equipment and survival gear; and to allow the development of small-scale tourist accommodations. Other respondents assert that camping should be restricted. One individual suggests requiring permits for those camping in backcountry areas in order to reduce human-caused wildfire, while another suggests restricting camping in roadless areas to small groups.

## *Camping/Shelters/Accommodations/etc. General*

### **1229. Public Concern: The Forest Service should address privatization of forest facilities.**

#### **CAMPGROUNDS**

Other areas of concern to me are the privatization of many of the forest facilities, such as the campgrounds. (Red Creek campground in the Dolly Sods Wilderness—Monongahelia National Forest—West Virginia for example). (Individual, Laurel, MD - #A12185.90910)

### **1230. Public Concern: The Forest Service should reevaluate the use of campgrounds by private companies.**

The Forest Service should reevaluate the use of private companies on the campgrounds who are charging for the use of public lands. (Individual, Klamath Falls, OR - #A21591.15122)

## *Allow Camping/Shelters/Accommodations/etc.*

### **1231. Public Concern: The Forest Service should allow camping in roadless areas.**

Hiking and camping should be allowed in these areas. (Individual, Olympia, WA - #A580.90100)

Allow camping with campsite restrictions at environmentally sensitive areas, where appropriate. (Individual, Bothell, WA - #A5228.90110)

#### **BY EXPANDING FACILITIES**

I would add that where camping is permitted that camping should be spread out so that people have a bit of privacy and isolation. Current camping in National Forests is a joke. Being crammed into a small area with other campers is not my idea of camping. (Individual, Palmer Lake, CO - #A23361.90000)

### **1232. Public Concern: The Forest Service should allow the construction and maintenance of Adirondack shelters in roadless areas.**

Amenities such as Adirondack shelters and hardened trails should be allowed. Mechanized equipment and other equipment needed to construct or maintain trails or shelters should be allowed. (Elected Official, Libby, MT - #A18119.90100)

### **1233. Public Concern: The Forest Service should provide shelters for maintenance equipment and survival gear.**

Provide shelters for maintenance equipment and survival gear. (Individual, Del Mar, CA - #A868.91710)

### **1234. Public Concern: The Forest Service should allow the development of small-scale tourist accommodations.**

In response to your question about “specific activities that should be expressly prohibited or expressly allowed for IRAs through Forest plan revisions or amendments”, the group wants to see development of small-scale tourism; small groups of independent travelers coming to Cordova and using existing facilities fits within this picture. Development of destination lodges for 50-100 guests and the accompanying infrastructure—including new roads on public lands—does not. (Organization, Cordova, AK - #A23229.91310)

## *Do Not Allow/Restrict Camping/Shelters/Accommodations/etc.*

### **1235. Public Concern: The Forest Service should require permits for those camping in backcountry areas.**

#### **TO REDUCE HUMAN-CAUSED WILDFIRE**

As a precaution against possible human-caused wildfire, permits could be required for back-country camping. (Individual, Fort Collins, CO - #A17987.91110)

### **1236. Public Concern: The Forest Service should restrict camping in roadless areas.**

#### **TO SMALL GROUPS**

We feel one specific activity that should be prohibited from inventoried roadless areas would be camping permits allowing large numbers at gatherings. The impact on trees and grounds is astronomical. (Individual, Bayfield, CO - #A13395.90110)

## **Special Use Permits**

### **Summary**

One county commissioner suggests that the Forest Service should address issues related to special use permits—specifically, recreation activities that are proposed, in development, or in place but which are not currently covered in special use permits; and modifications or renewals of special use permits. An elected official asks the Agency to streamline the permit process for state agencies, “especially in instances where a state agency is attempting to gain access in order to carry out salvage logging or urgent forest health activities.”

### **1237. Public Concern: The Forest Service should address issues related to special use permits.**

#### **RECREATION ACTIVITIES THAT ARE PROPOSED, IN DEVELOPMENT, OR IN PLACE BUT WHICH ARE NOT CURRENTLY COVERED IN SPECIAL USE PERMITS**

While the DEIS (3-12) indicated that proposed recreation development in inventoried roadless areas would be allowed to continue if special use permits are in place, this is misleading since there are numerous activities that are proposed, in development, or in place, that do not currently have special use permits covering all of the activities or lands. (Elected Official, Roseburg, OR - #A11811.90000)

#### **MODIFICATIONS OR RENEWALS OF SPECIAL USE PERMITS**

The DEIS statement ignores that issue that will arise relative to modifications or renewals of the special use permits. We suggest that any rule clearly address this issue. (Elected Official, Roseburg, OR - #A11811.90000)

### **1238. Public Concern: The Forest Service should streamline the permit process for state agencies.**

Streamlining of the permit process is also necessary, especially in instances where a state agency is attempting to gain access in order to carry out salvage logging or urgent forest health activities. Working with state land agencies to come up with “access plans” that could be incorporated into forest plans would be one way to facilitate the process. (Governor, State of Idaho - #A20141.15130)

## Other Recreation Concerns

### Summary

Respondents suggest a variety of specific activities they say should be prohibited in roadless areas. These include sporting events, fireworks, dog sledding, activities that involve cleated hiking boots, and golf area development. One Organization also suggests that the Forest Service set conservative carrying capacity limits in the Western Sound.

### 1239. Public Concern: The Forest Service should prohibit various activities in roadless areas.

#### SPORTING EVENTS

All . . . sporting events should be prohibited in Roadless Areas. (Individual, Philipsburg, MT - #A15223.90100)

#### FIREWORKS

NO FIREWORKS! (Individual, No Address - #A583.90110)

#### DOG SLEDS

. . . animal travel including dog sleds . . . should be severely restricted. (Association, Minneapolis, MN - #A19249.90110)

#### ACTIVITIES THAT INVOLVE CLEATED HIKING BOOTS

Cleated hiking boots . . . should be prohibited. (Individual, Centennial, CO - #A26987.91120)

#### GOLF AREA DEVELOPMENT

Permanently protect all roadless areas from all environmentally destructive activities, including . . . golf area development. (Individual, Staunton, VA - #A29325.90110)

### 1240. Public Concern: The Forest Service should set conservative carrying capacity limits in the Western Sound.

With an estimated 600% increase in the number of recreational and sport fishing boats in the Western Sound with the Whittier access road opening, ought to compel the FS to set conservative carrying capacity limits in PWS and to maintain the integrity of roadless areas in this region. Regardless of jurisdiction disputes or pressures from the tourism industry, the FS must comply with laws that mandate assessment of the preferred alternative (such as the Endangered Species Act or ESA). The preferred alternative ought to be a conservative plan; the last thing the Sound and its inhabitants need are to be further stressed by pollution or overuse. (Organization, Anchorage, AK - #A23038.45622)

## Designating Areas (Question 8)

**Question 8: Designating Areas. Should inventoried roadless areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation, or should they be maintained under a specific designation for roadless area management under the forest plan?**

This section includes six subsections: Designating Management Categories General, Wilderness Recommendations, Roadless Designation, Inclusion/Exclusion of Specific Areas from a National Roadless Rule, Use of Existing Forest Plan Designations, and Other New Management Categories.

### Designating Management Categories General

#### Summary

The phrasing of Question 8 (above) gives rise to three distinct types of comments. Individuals simply write in a short statement, such as ‘Recommend all roadless areas for wilderness,’ or ‘No more wilderness.’ Others, both those who ask that the Roadless Area Conservation Rule be implemented and those who ask that it not be implemented, challenge the either/or choice implicit in the question. “This [Q8] is not an either/or issue,” begins a typical comment, “and no changes in the Roadless Rule are needed to address it. By law, forest plans must evaluate the wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. The Rule allows the wilderness recommendation process to continue.” These respondents often continue with suggestions for the preferred management of these areas. The third general type of comment takes the question more broadly and provides suggestions for evaluation criteria and various management designations for these areas. Given that management prescriptions by their very nature prohibit or allow a set of activities, many responses to Question 8 also list the various uses that should be allowed or prohibited under a specific roadless designation.

Among those who state that options presented in Question 8 are too narrow, a number say that allocation decisions should be made on an area-by-area basis. Some assert that these decisions should be based strictly on scientific criteria, with ecotype or ecosystem dynamics as determining factors.

A number of respondents recommend a wider variety of management classifications than simply roadless or recommended wilderness. Some ask state that as long as local forest prescriptions are consistent with a national rule, they should be available for use by local forest planners. Others ask that standard forest planning continue with the widest possible array of prescriptions available, including those that would otherwise be disallowed under the Rule because they allow roadbuilding or timber removal.

Some request that all roadless areas that are currently allocated at the local level to prescriptions that prohibit roadbuilding and timber harvest be removed from the current debate. Others ask that the Forest Service include all inventoried roadless areas under a national rule immediately, regardless of current classification status.

**1241. Public Concern: The Forest Service should base management allocations on science.**

**BY ASSIGNING DIFFERENT MANAGEMENT PRESCRIPTIONS BASED ON ECOTYPE**

This brings me to my point of how this forest system should be managed by good science that is checked by both ends of the spectrum, but in such a manner as certain areas are divided for particular uses and studied under a forest time scale (>30yrs) and no changes are made to the management of that study area for at least this duration. This ultimately would require that your agency take charge and designate areas of use/non use. This would be the most difficult step because both polarized groups will never be satisfied with any finalized plan you submit. Observing that the original intent of your department was to manage a national forest preserve, essentially for wood supply and only recently (~20years) has it turned into a recreational area management department, perhaps you should take this time to state your purpose as an organization so that no one will have a misunderstanding as to your role. You must manage the national forest system on a specific area basis too, as the Sitka Spruce in Alaska grow differently than the Douglas Fir of coastal Oregon as do the Pines of the Rocky mountains. Once you have obtained and stated your purpose and started managing forests based in good science then the future of our forests will be secured. (Individual, No Address - #A14.25340)

**BY BASING LEVELS OF PROTECTION ON A SCIENTIFIC ENVIRONMENTAL ASSESSMENT**

Wilderness or roadless designation and protection should be based on the level of protection needed as shown by scientifically based environmental assessment. (Individual, Tucker, GA - #A4543.25000)

**1242. Public Concern: The Forest Service should consider ecosystem dynamics when creating land use designations.**

If ecosystem management is not politically passé yet, let's apply it to this situation. In a landscape that is intensively managed for timber extraction (as many National Forests are), roadless areas are most often ecologically unique in that they are in a late seral successional stage (e.g. "old growth. But note the term "successional", implying an inherently dynamic system. In forest ecosystems fire, disease, windstorms, and logging are the main processes which reset the successional clock. So if maintaining late seral islands and corridors within our forests is the ultimate goal, then declaring a certain area roadless only eliminates the human-induced disturbance. And the sense of "permanent protection" such a legal designation implies is at odds with the reality of a dynamic system. One of the other "natural" factors is likely to reset the successional clock. This probability will only be exacerbated in a global warming scenario. A static roadless designation doesn't go far enough toward maintaining a stable percentage of late seral ecosystems. I propose a "dynamic designation". I know this would be an implementation nightmare, especially for a federal agency, but it has a lot of merits for all "stakeholders" concerned. (Individual, McCall, ID - #A25834.50100)

**1243. Public Concern: The Forest Service should acknowledge that Question 8 is not an either/or issue, and no changes to the Roadless Area Conservation Rule are needed.**

This [Q8] is not an either/or issue, and no changes in the Roadless Rule are needed to address it. By law, forest plans must evaluate the wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. The Rule allows the wilderness recommendation process to continue. Forest plans also designate roadless areas for continued roadless management, regardless of whether they are recommended for wilderness. The Rule ensures that roadless areas will, at a minimum, be protected from road construction and commercial logging. (Organization, Denver, CO - #A21367.25110)

Forest plans are obligated by law to evaluate wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. That doesn't change under the Roadless Rule. Forest plans also designate roadless areas for continued roadless management, regardless of wilderness recommendations. (Individual, Ridgway, CO - #A22352.25110)

Existing law requires forest plans to evaluate wilderness potential of national forests and make recommendations to Congress. The Rule did not change that, and no new rulemaking process can override that law. Forest plans should continue to protect the roadless quality of roadless areas pending any Congressional action on wilderness designation, and should take special care not to impair the suitability of such areas for wilderness designation. (Individual, Hyattsville, MD - #A22957.25110)

These designations are not mutually exclusive. The law states that forest plans must evaluate the wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. The Rule allows the wilderness recommendation process to continue. Forest plans also designate roadless areas for continued roadless management, regardless of whether they are recommended for wilderness and the Rule ensures that roadless areas will, at a minimum, be protected from road construction and commercial logging. (United States Representative, Washington - #A23209.25110)

The areas are roadless and should be managed as such. If some get proposed for wilderness, fine. But roadless is a management designation and whether these lands should be proposed for wilderness is a separate issue. (Individual, Conifer, CO - #A27021.25110)

#### **1244. Public Concern: The Forest Service should consider a full range of management alternatives for roadless areas, not just “roadless” or “recommended wilderness.”**

Should inventoried roadless areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation, or should they be maintained under a specific designation for roadless area management under the forest plan?

No to both questions. Recommendation for addition to the wilderness system or long-term management as roadless are only two of the broad range of alternatives that should be considered for each unit. (Business, Lewiston, ID - #A7991.25000)

We think both; that is, of those roadless areas selected to remain roadless, some should be recommended for wilderness and some should be put in a management prescription, like semi-primitive non-motorized, to protect them. This also is a decision to be made in the forest planning process. A few areas may warrant proposed wilderness status. Most will be placed in an unroaded prescription. Either way, the public will point the direction for that split. It will then be up to Congress to decide if a recommended wilderness warrants that protection. (Elected Official, Saint Anthony, ID - #A4942.25000)

The FEIS Specialist Report for Wilderness and Special Designated Areas indicates that IRAs have acted as the “reservoir for future wilderness areas” and that because of the proliferation of special designations, such as wilderness, the number of roadless acres is in decline. The report notes that this trend parallels a decrease in the supply of appropriate settings for Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized recreation opportunities in an “environment of increasing demand.” We certainly agree with this assessment and believe that it further illustrates the special value roadless areas have to the American people. Unlike the heavy and contentious restrictions of Wilderness Area designation, roadless area conservation can provide for a wider variety of opportunities while still protecting values associated with wilderness. Americans WANT to “preserve” green space but people also want access to this space for recreation. Roadless area conservation should be viewed, and used, as a way to provide the public with large holdings of high quality, yet non-contentious green space. (Organization, Pickerington, OH - #A3645.50200)

### BOTH ROADED AND UNROADED CATEGORIES

For all inventoried roadless areas, forest plan revisions should consider a full range of management alternatives, from active management to wilderness recommendations. If selected in a forest plan revision or amendment to remain roadless, activities that may be permitted should include motorized and non motorized recreation, forest health treatments, watershed improvement activities, wildfire and insect and disease suppression, and some improvements not requiring permanent road access. (Individual, Grants Pass, OR - #A5305.25000)

Roadless lands vary enormously in terms of their terrain, ecologic communities, resources, social setting, and economic importance to surrounding communities. Planners must develop and examine a full range of alternatives for each, from development to potential wilderness. The prescription for every roadless unit should be designed to best fit its unique character.

The one-size-fits-all approach utilized in the initial rule making is unprofessional, as insult to the land, the management professionals responsible for it and the people who rely on it. . . .

Each unit should be addressed individually in forest plans. The highest and best use or land access issues might require roads on some units. On the opposite end of the scale, some units might be best added to the wilderness system, taking on the extensive prohibitions required by that designation. Units to be managed in the long run as roadless, but not wilderness, can support a wide variety of uses, depending on their characteristics and specific resource considerations. (Organization, No Address, #A8227.25000)

### UNROADED CATEGORIES ONLY

After deciding which areas should be recommended for wilderness, further evaluation should be done to allocate the remaining areas to appropriate prescriptions. Some of relevant allocation categories include: backcountry recreation, habitat for wildlife requiring unfragmented forest, community water-supply watershed, scenic areas, cultural or historic areas, habitat for rare communities or species, research natural areas, old growth restoration areas.

Inventoried roadless areas that are not recommended for wilderness should be allocated to prescriptions in the forest plan that maintain the roadless characteristics of the area in a manner consistent with the roadless area conservation rule, but that emphasize the special or unique characteristics of the area. While remaining consistent with the roadless area conservation rule direction, a prescription may be applied to a specific area or parts of an inventoried roadless area that recognizes specific additional prohibitions or mandates additional required management activities for that area. We have also noted that some of the allowed exemptions for road construction or timber harvesting may be identified as appropriate for some roadless areas and the area is allocated to an appropriate prescription. We would expect a variety of management emphases for various roadless areas. Thus, we believe it would be inappropriate to specify only one designation for the management of roadless areas that are not allocated to wilderness recommendations. (Civic Group, Roanoke, VA - #A1713.25300)

I think it is important for holistic forest management. Some areas may meet more of the demand for wilderness designation, while others may best achieve USDA goals through roadless area designation. One huge mistake, in my opinion, would be to cram all designated roadless areas into a single legislative box, though I predict that whoever's holding the most power over roadless areas would disagree with me very strongly on this. This is a case where dividing up the pie according to greatest overall need probably makes the most sense, but where petty internal politics could easily derail the whole process. (Individual, New Haven, CT - #A706.25120)

### 1245. Public Concern: The Forest Service should determine roadless area allocations on a site-specific basis.

I am a forester working in the Adirondack State Park in New York state. The park encompassed approximately 6 million acres, with over 2.6 million owned by the state and many more acres under construction easements. The state owned land has grown considerably since its inception in 1885 when the legislature enacted the law protecting the forest as 'forever wild.' Today, the park is bigger than Yellowstone, Yosemite, and the Grand Canyon combined.

While not all of the park is set aside as wilderness, a considerable chunk of it remains a roadless preserve. Likewise, there are other areas designated for more intensive use, ranging from “wild forest” (less restrictive) to “primitive areas” (more restrictive). Using a single broad brush to create a rule that encompasses millions of acres may not be the best plan. (Individual, Schuyler Falls, NY - #A4779.25000)

**1246. Public Concern: The Forest Service should assign land uses that are compatible with uses being implemented by adjoining landowners.**

**ON THE TONGASS NATIONAL FOREST**

Because the Tongass National Forest so dominates the ownership pattern in Southeast Alaska, actions taken in the course of managing it can significantly affect adjacent landowners. As a considerate neighbor, management actions should recognize the following:

Forest Service should give greater consideration to assigning land uses that are compatible with the uses being implemented by adjoining landowners. Native corporations are largely managing their lands for intensive commodity uses. The State of Alaska owns lands dedicated to recreation and community development. The Forest Service should incorporate the needs of those designations into its management of adjacent federal lands.

Sealaska has a common boundary with many areas that are in some type of roadless category. Sealaska is developing, or has developed its adjacent lands. There are opportunities for the Forest Service to participate with Sealaska in a manner that would be advantageous to Tongass NF planning and administration. (Tribal Corporation, Seattle, WA - #A20468.45100)

**1247. Public Concern: The Forest Service should remove from debate the roadless areas already designated for continued protection in existing forest plans.**

Half the 58 million acres under consideration for permanent roadless status are already designated roadless in existing forest plans and should be removed from policy dispute. Keep the wild areas wild! (Individual, Butte, MT - #A10391.25100)

**1248. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule regardless of the current land classification status of roadless areas.**

In addition to Roadless Areas recommended for wilderness designation, all Roadless Areas should be managed under the guidelines of the RACR. This does not require additional categorization, it requires implementation. (Organization, Boise, ID - #A20363.25230)

**(8. Designating Areas.)** The most important action is to protect the unique values and the roadless character of these areas. I’m more concerned that they are given real protection than to argue over what to call them. (Organization, Helena, MT - #A20598.25000)

**1249. Public Concern: The Forest Service should apply the same planning process to both roaded and roadless areas.**

The inventoried roadless areas are the main areas on which all timber harvesting must necessarily take place because such a small portion of the National Forests in Alaska is roaded. Accordingly, the planning process should apply to both the roadless and roaded areas in exactly the same way and their management should be determined through the same process applied without regard to whether a specific area is roaded or unroaded. The Forest Supervisors have the best local knowledge for each national forest. Consequently, they should be given the responsibility for preparing and approving environmental impact statements for timber sales. (Association, Ketchikan, AK - #A20443.12125)

The planning process should apply to the roadless and roaded areas in exactly the same way and their management determined through the same process applied without regard to whether a specific area is roaded or unroaded. (Individual, Sitka, AK - #A12821.45513)

### **1250. Public Concern: The Forest Service should make land use designation decisions in a timely manner.**

Reach a decision in a timely manner regarding the labeling of lands for specific uses. As you're aware, it's been nearly 40 years since the Wilderness Act and some lands are still in limbo. Get this process finalized and forward recommendations to Congress. There are sufficient federal lands for everyone to get some of what they want. However, the indecision and flux of the last couple of decades has not enhanced the public's view of the job being done by the Forest Service. (Governor, State of Montana - #A17660.14400)

## **Wilderness Recommendations**

### **Summary**

**General Comments** – A number of respondents note that the local forest planning process must consider additional wilderness recommendations, and assert that a national rule does not change this. Others state that the wilderness consideration process should be modified, and suggest such changes as subjecting all recommendations to a local vote or to a local resident decision-making process of some kind. A few individuals suggest that in limited cases, such as national emergencies or wars, wilderness status should be temporarily revoked for resource use, followed by full land restoration and reinstatement of wilderness status.

Some believe that the Forest Service should reverse its institutional resistance to wilderness designation in order to protect a wider range of ecosystems and meet the changing priorities of the public. Groups also cite the low percentages of capable and available roadless areas that are recommended for wilderness designation in current forest planning efforts as evidence of perceived ongoing internal agency bias against wilderness.

A number of respondents answer Question 8 simply with a statement for or against recommending inventoried roadless areas for wilderness designation versus assigning them to a separate roadless category. Respondents request wilderness designation. Those who request wilderness designation provide a wide range of reasons for their position, including the need to set aside America's few remaining wild places; the need to balance environmental protection with human uses; the need to ensure protection of these areas regardless of political changes in the administration; and the desire to reduce costs of this rulemaking to taxpayers. Some who request additional wilderness designations provide names and descriptions of specific roadless areas they say should be recommended to Congress. (A list of these areas, as well as a list of areas that respondents say should be assigned to a designated roadless category, is found in Appendix F. This appendix also lists specific areas that some respondents ask not to be recommended for wilderness, or ask not to be designated roadless.)

Other respondents do not agree that additional wilderness designations are appropriate. Those who request no additional wilderness designation often state that there is already enough wilderness set aside; that wilderness areas prohibit too many recreational activities, such as mountain biking, snowmobiling, and ATV use; or that wilderness is inherently elitist. Some people propose that if Congress fails to act on wilderness recommendations within a set amount of time, then these areas should be returned to multiple use management.

**Wilderness Recommendation Criteria** – Comments about the criteria that should be used in the wilderness recommendation process vary. Numerous respondents assert that the Wilderness Act itself, as well as the Forest Service Manual and Handbook, already provide detailed and sufficient guidance in this process. Respondents do, however, enumerate specific characteristics they say should be emphasized or included in the recommendation process. These include expanding the criteria for total acreage to include areas less than 5,000 acres. Others state that acreage alone is less important than proximity to other protected areas, such as existing wilderness areas or National Park Service lands. Still others assert that decisions should be based on whether a given roadless area can function without active management or whether an area is within a complex large enough to sustain the role of natural fire regimes. Some request that the Forest Service ensure that all recommended areas truly have no roads. Finally, some suggest that roadless areas that do not initially meet recommendation criteria should continually be reevaluated to see if conditions have changed which would allow them to be included.

**Management of Roadless Areas that Do Not Meet Wilderness Criteria** – A number of respondents recognize that not all roadless areas will meet strict wilderness recommendation criteria, and make suggestions about management direction for them. These respondents suggest that all non-qualifying areas should be assigned to a specific roadless category. Others ask that they be assigned to any existing category consistent with a national rule. A number of people ask that any areas that do not meet wilderness criteria be returned to full multiple use management. A few suggest existing management categories that should be assigned to non-qualifying areas, from general forest to backcountry non-motorized.

**Relationship Between Roadless and Wilderness Management** – Respondents discuss the tradeoffs or connections between roadless area protection and wilderness designation. They say that all roadless areas should be maintained in a condition that will preserve their wilderness characteristics. Some assert that this must be done to maintain the option for Congress to add more areas to the National Wilderness System. Others say that recreational and commodity pressures have become so intense that managing these areas as unroaded is vital. Some ask that the Forest Service bear the burden of proof that roadless areas should be entered.

Others assert that the Agency must maintain the conditions present when the Wilderness Act was passed in 1964 in each roadless area, whether roaded, unroaded, or otherwise modified by human activity. Still others state that inventoried and uninventoried roadless areas should not be managed such as to preserve their wilderness characteristics, saying that amounts to de facto wilderness management. These respondents ask that the Roadless Area Conservation Rule not be implemented. (See also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Wilderness Acts*.)

### *Wilderness Recommendations General*

#### **1251. Public Concern: The Forest Service should make decisions to recommend areas to Congress for wilderness designation through the forest planning process.**

The Forest Plan should make the decision whether or not an area should be recommended to Congress for Wilderness designation. (Individual, Grants Pass, OR - #A5305.25200)

The Wilderness Study Area category should be retained. Those designated roadless areas that might qualify for the Wilderness System should be managed as WSAs under management that will not jeopardize their later possible designation by the Congress as Wilderness. Those roadless areas that cannot qualify as WSAs should be managed under the forest plan, with full multiple use values considered. (Individual, Asheville, NC - #A8386.25220)

**1252. Public Concern: The Forest Service should designate qualifying areas as wilderness study areas until Congress takes action on them.**

Inventoried roadless areas that meet the guidelines for consideration as wilderness areas should be designated as wilderness study areas. Congress would then decide on wilderness designation using the goals for conservation and protection of wild areas as priorities. (Individual, Gallatin Gateway, MT - #A19100.25220)

**1253. Public Concern: The Forest Service should reverse its institutional resistance to recommending roadless areas for wilderness designation.**

Every roadless area should be carefully considered for possible Wilderness designation, in whole or in part. The special values of these areas flow from their undeveloped condition. The reality of modern life is that there are constant pressures to alter the natural condition of roadless areas for economic gain or convenience. The long term viability of these areas as reservoirs of natural values would be enhanced by a higher level of legal protection than just an administrative rule. Designation as Wilderness Areas is the highest level of legal protection for natural areas that is available in our society and should be pursued for all qualifying areas. In general, Forest planning should favor Wilderness designation of roadless areas. Designation as Wilderness should be recommended except when local planning can clearly demonstrate that this designation would be incompatible with an important natural or social value of a particular area. The "burden of proof" should be to show that the area is not suitable for Wilderness. For thirty years, the Forest Service has insisted on the opposite standard. They have placed the "burden of proof" on those who wish to preserve a roadless area and have been biased in favor of development and intrusive management. It is time to reverse this bias before we lose all our important natural areas. (Individual, Palo Alto, CA - #A15827.25210)

The local forest plan process should re-evaluate Roadless Areas for inclusion in the National Wilderness System and should make new recommendations based on a new evaluation. In the recent forest plan revisions in National Forests of Idaho there has not been an adequate reconsideration of wilderness values and public interests in wilderness designations. The Forest Service is operating under outdated assumptions of public interests and needs in wilderness designations. This should be corrected in future forest plan revisions. (Organization, Boise, ID - #A20363.25230)

**Region 2 Has Poor Record for Recommending Wilderness Protection for Roadless Areas.**

The failure of Region 2 forest plans to protect roadless areas is further reflected in the Region's failure to recommend roadless acres for wilderness protection in recent forest plan revisions. Frankly, Region 2's record on identifying, protecting, and recommending for wilderness roadless areas during the forest planning process has been abysmal. In the previous four forest plans revised in the last few years in Region 2, the Forest Service identified as roadless a total of 1,387,853 acres on the Black Hills, Rio Grande, Arapaho-Roosevelt, and Routt National Forests. Of this, conservationists recommended 806,430 acres for wilderness, and the agency itself found hundreds of thousands of acres to be "eligible" for wilderness. Yet, the Forest Service recommended only a paltry 8,551 acres for wilderness designation. In other words, Forest Service Region 2 released more than 99.3 % of existing roadless areas to other uses, which include, in some areas: snowmobiling, off-road vehicle travel, logging, roadbuilding, and other uses inconsistent with wilderness.

Even though the Forest Service found more than one-half million acres to have all of the characteristics of wilderness and even to be "available" for wilderness, the Forest Service disregarded its own findings that recreational use of wilderness is increasing and that some existing wilderness areas are already being overused and degraded, by concluding that there is no need for additional wilderness. In addition,

although the agency repeatedly found that recommending existing lower-elevation roadless areas could make important contributions to the protection of under-represented ecosystems in the National Wilderness Preservation System in each of these four Forests, the Forest Service again ignored its own findings and concluded that no additional wilderness was needed. (Organization, Denver, CO - #A21367.25200)

**1254. Public Concern: The Forest Service should allow temporary withdrawal of wilderness status for resource commodity use followed by restoration to wilderness condition.**

If wilderness holds critical materials and the methods of exploitation is ephemeral there is no reason not to temporarily withdraw the area from wilderness designation and take advantage of it. Once the materials have been exploited it can be returned to its original condition and re-designated wilderness. Civil law fluctuates with the times in every other part of the body politic, why not land-use law? (Individual, No Address - #A8879.25000)

**DURING WARTIME**

These areas should be proposed for wilderness designation. However, there should be a caveat that these areas may be opened in the future if the American people require the resource for catastrophic events of national significance, like war. This caveat should not include language that would make it easy to renege a wilderness designation, but should make the areas available to the American people in emergency situations only. A recession, poverty, consumer greed, etc. do not qualify as emergency situations that would require opening these areas to harvest. The only situation of national significance that would warrant the removal of a wilderness designation on a roadless area would be war, where the harvestable supplies are required to help sustain the country during the war. There should be another caveat that says that those lands removed during such times of national significance should revert back to wilderness designation regardless of condition once the war ends, or within one year of the end of the war. But, for now, those lands should be proposed for wilderness designation. Perhaps lands that will be maintained in perpetuity as wilderness could be designated as a Wilderness A Area and one of the formerly roadless areas turned wilderness could be designated as a Wilderness B Area. That would distinguish between those lands that are out of reach permanently and those within reach during wartime. This Wilderness B designation shouldn't be a means to harvest timber under the guise of a wilderness designation. It should allow those areas that were roadless to be accessible in the event of war, but at no other time. (Individual, No Address - #A29243.25000)

**1255. Public Concern: The Forest Service should allow local communities to decide whether to establish roadless and wilderness areas.**

The Forest Service should consider establishing an alternative that would allow local communities to establish or not establish roadless areas and Wilderness with local Forest Officials without any influence from National or Regional Officials inside or outside the agency. (Individual, Alturas, CA - #A28581.13230)

**1256. Public Concern: The Forest Service should subject all wilderness recommendations to a binding vote at the county, state, and congressional district level.**

"Inventoried roadless areas" should be proposed for Wilderness designation immediately, and designated by hard-release legislation, with conditions. A proposal for wilderness designation will only be forwarded to Congress after forest-wide "ground-truthing" work has been approved by: 1) a vote on the first Tuesday in November in an even-numbered year by all citizens at the county, Congressional district, and state level; 2) any county voting against a wilderness designation shall have no lands within its boundaries designated; 3) any Congressional district voting against wilderness designation will have no lands designated within that district; and 4) no state in which a majority of citizens votes against additional wilderness designation shall have such designation anywhere in the state.

If a majority of state citizens vote for wilderness, but no county and no Congressional district votes to approve such designation, then no land will be recommended, and “hard-release” legislation will be forwarded to Congress for approval.

If a county votes for approval of lands within its boundaries without approval at the state or Congressional-district level, then the issue may go up for a second vote in the next even-year general election. But if approval fails for a second time, then no more lands within that state can be designated. (Individual, Whitefish, MT - #A20672.25230)

## *Do Recommend Roadless Areas for Wilderness Designation*

### **1257. Public Concern: The Forest Service should recommend all roadless areas for wilderness status.**

Please add the 60 million acres to the existing wilderness nationwide. The damage to our land using open roads can be seen in Montana. There’s not much time to take care of our home. (Individual, Helena, MT - #A5256.25210)

Designating Areas—Roadless areas absolutely should be proposed to Congress for wilderness designation. (Individual, No Address - #A5242.25000)

The last roadless areas in America should all be designated wilderness and left alone. (Individual, Big Sky, MT - #A106.25200)

I think that [wilderness designation] would give them more protection (i.e. they should be wilderness areas). A new roadless management plan would lead to loopholes I didn’t want. (Individual, Yelm, WA - #A17978.25200)

I’m inclined to prefer that the inventoried roadless areas, as defined in the previous record of decision made before the current Administration’s “review” misstep, revert to Congressionally designated Wilderness, as I believe that would give the highest level of protection of natural forest ecosystem values under current federal management strategies. Unless a stewardship plan for Roadless emerges for the Forest Service, which would convey a higher level of protection to be the best available. (Individual, Goldendale, WA - #A21668.25200)

#### **TO PRESERVE WHAT WILD AREAS ARE STILL LEFT**

Designating Areas—Yes, all designated roadless areas should be given consideration for wilderness designation and some may certainly qualify. This may be a good time to expand wilderness areas while we still have some additional wild areas left. However, not all roadless areas will qualify. You should consider a national roadless management process that covers these not-quite-wilderness areas. (Individual, Boulder, CO - #A5250.25000)

All of these lands should be added to the National Wilderness System: Too much of the national forest system has been degraded by over 400,000 miles of logging and mining roads, millions of acres of impoverished over-cut lands and other facets of industrial development. Roadless areas need to be off limits to motor vehicles, including all-terrain vehicles. Roadless areas need little or no protection from lightning-ignited wildfire and native insects. These and other natural processes are vital elements of the ecosystem. (Individual, Richmond, CA - #A18059.25210)

#### **TO STRIKE A BALANCE BETWEEN ROADED AND UNROADED AREAS**

All of the 58.5 million acres identified in the Final Environmental Impact Statement should be recommended to Congress for inclusion in the National Wilderness Preservation System, and the sooner this recommendation is made the better, or it is clear from this process and your intent behind it that we will continue to lose, at an alarming rate, remaining lands on national forests that qualify as wilderness.

This Rule only sought to strike a balance; already two-thirds of our national forests have had roads constructed through them, and but one-third remains without roads. Saving the last third does not seem an unreasonable balance to strike. It is not as if a greedy American public is asking that a half or three-quarters be protected in a natural state. (Individual, Ward, CO - #A18076.25210)

#### **TO ENSURE THE LEAST POSSIBLE DAMAGE TO THE ENVIRONMENT**

Because it is so difficult to manage roadless areas in ways that enable the least damage, they should be designated and managed as wilderness. This would provide some semi-clear guidance and allow for helpful management steps. For example, snowmobiles (ATVs) are very damaging to plants and especially wildlife. They should be kept out of roadless areas. Wilderness designation would aid in this effort. (Individual, Salt Lake City, UT - #A13520.25200)

#### **TO ENSURE THEIR CONTINUING PRESERVATION THROUGH CHANGING ADMINISTRATIONS**

If we are to treat these areas as wilderness, it would be forthright to label them in that manner. That would also ensure that they are not liquidated by changing Forest Service or executive administrations. (Individual, Lacey, WA - #A530.25200)

I believe that inasmuch as we can meet the requirements of the Wilderness Protection Act, inventoried roadless areas should be designated as wilderness. That way they are protected from future "reviews" by corporate-friendly administrations eager to please their contributors by legislative slight-of-hand that opens the door to developing these fragile areas. If they are not designated wilderness, then another permanent designation must be "invented" by which these areas are placed in a natural trust so that they are there for future generations of Americans. (Individual, Denver, CO - #A20707.25100)

#### **TO ENSURE SUSTAINABILITY OF HUMAN LIFE**

The bottom line for everyone is clean air, clean water, a functional biosphere. If sustainable human life is the criterion, the only answer is wilderness designation. That issue trumps all economic questions. (Individual, Black Mountain, NC - #A707.25200)

### **1258. Public Concern: The Forest Service should recommend all roadless areas for wilderness status.**

#### **TO REDUCE COSTS**

Designate all roadless areas for wilderness now and be done with it now!! Get it passed through Congress quickly so that we can reduce Forest Service staffs and therefore reduce taxes. (Individual, Montrose, CO - #A370.25210)

The inventoried roadless areas selected for protection should also be proposed to Congress for wilderness designation, to give them the highest degree of protection from development. Otherwise regulations for protection will have to renegotiated continuously under pressure from economic interests, which is a waste of taxpayer time and money. (Individual, Boulder, CO - #A19113.25210)

### **1259. Public Concern: The Forest Service should recommend as many wilderness areas as possible.**

The more wilderness designations the better. Focus on pristine wilderness values. (Individual, McDonough, GA - #A805.25000)

### **1260. Public Concern: The Forest Service should recommend additional wilderness areas on a site-specific basis.**

#### **EACH TIME A FOREST PLAN IS REVISED**

Each roadless area will require a decision based on its current condition, and how it will be managed in the long run. Some areas should be withdrawn for inclusion in the Wilderness System. This will set

general management parameters, but local folks have some ability to site-specifically tweak management options. Some areas can be withdrawn from roading and timber management for the next cycle. These areas may not contain true wilderness attributes, and the timber may not currently require active treatment. Such areas develop a different set of management parameters at the local level that may allow such use as motorized recreation, chainsaws, etc. Some areas may require immediate access and silvicultural treatment. These areas may carry a different set of parameters, and allow for a decision to do such things as maximize wildlife habitat, or add no new open roads to the system. (Association, Kamiah, ID - #A3685.25000)

#### **BECAUSE LOCAL INPUT IS NEEDED**

There may be areas suitable for wilderness designation, and I do not disagree that appropriate management of forest lands should include development restrictions. However, this should be decided on a case-by-case basis, with local input, particularly, but not limited to, direction from the professionals of our local forest service offices. (Individual, Greybull, WY - #A346.25230)

This should be decided on a case-by-case basis at a national level wherein public input should be given significant weight and time, with sufficient notice. (Individual, Astoria, OR - #A476.25230)

### **1261. Public Concern: The Forest Service should recommend qualifying roadless areas to Congress for wilderness designation.**

Our National Parks are great and preserve much spectacular beauty, but they are often crowded and not the best places to go for serenity and enjoyment of natural surroundings. The national forests provide an escape for campers, fishermen, hikers and nature lovers and their families from the stresses of modern life. Designation as wilderness would further protect these areas for all Americans who appreciate the value of nature. (Individual, Port Angeles, WA - #A1044.70320)

It is the responsibility of the Forest Service to identify all lands that are appropriate for wilderness designation. Some roadless lands may qualify, certainly many will not. Management of roadless areas in general need not be as restrictive as management of wilderness areas. (Individual, Two Harbors, MN - #A17502.25220)

Certainly some units should be recommended to Congress as potential additions to the wilderness system. These would be those with outstanding wilderness attributes, large enough to serve as stand-alone wilderness. This might also include units adjacent to existing wilderness. (Association, Spokane, WA - #A21364.25220)

#### **TO COMPLY WITH EXISTING LAW**

By law forest plans must evaluate the wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. (Individual, Cooper, TX - #A13262.25000)

#### **TO PRESERVE THEIR WILD CHARACTERISTICS FOR THE LONG TERM**

I strongly believe that all remaining roadless areas must receive the highest level of protection viable, in order to preserve their wild characteristics for the long term. I strongly support Wilderness designation for any area that meets the criteria for such status. (Individual, Portola, CA - #A695.25200)

#### **TO PREVENT DEVELOPERS FROM BUILDING THERE**

Homeowners bear the ultimate responsibility for their property and the decision to encroach on pristine land. Reasonable measures should be taken to protect property, but I think property owners should be financially responsible for that effort. Don't build there and designate all roadless areas as wilderness so that real estate developers cannot build. (Individual, No Address - #A5216.35130)

#### **BECAUSE FOREST PLANS HAVE NO TEETH**

If the U.S. National Forest plans could have the same "teeth" as Congressional approved wilderness areas, the forest plans would suffice. Unfortunately, this does not seem likely; therefore, wilderness

designation is the only alternative until the Federal government and Forest Service can create comparable legislative protection to allow for the few uses not permitted in wilderness areas, such as the use of chain saws, selective and restricted use of off-road motorized vehicles, carefully selected logging, etc. (Individual, Geneva, NE - #A15512.25210)

### **1262. Public Concern: The Forest Service should recommend qualifying roadless areas to Congress for wilderness consideration and allocate other areas for roadless management.**

If the inventoried areas meet all the legal requirements for wilderness, then there is no reason not to serve them up to Congress. If for some reason they do not meet the standard, then they can just be left as designated roadless areas. (Individual, Billings, MT - #A277.25000)

Both should be pursued. This is not an either/or issue, and no changes in the Roadless Area Conservation Rule are needed to address it. By law, forest plans must evaluate the wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. The Rule allows the wilderness recommendation process to continue. Forest plans also designate roadless areas for continued roadless management, regardless of whether they are recommended for wilderness. The Rule ensures that roadless areas will, at a minimum, be protected from road construction and commercial logging. (Individual, Woodstock, NY - #A14020.25000)

National Forests should be able to continue to propose Roadless Areas for designation as Wilderness. National Forests should also be able to continue to add Roadless Areas to the RACR. No changes need to be made in the Rule. (Individual, Philipsburg, MT - #A15223.25000)

The issue of wilderness designation is separate from the roadless rule. Forest plans should evaluate roadless areas for wilderness consideration as is currently required. However, even if roadless areas do not receive such wilderness designation, they should still receive the protections provided under the roadless rule. (Organization, Oneonta, NY - #A15449.25200)

This is yet another very leading question [8]. . . the baseline of protection for roadless areas should be protection through the Roadless Rule rather than the forest planning process. The forest planning process should only be used to address any protections above and beyond the protections provided for under the Roadless Rule.

Furthermore, the choice provided is a false one. The protections of the Roadless Rule and recommending a roadless area for wilderness designation are not mutually exclusive. Forest plans are already required to evaluate the wilderness potential of all roadless areas and recommend suitable lands for wilderness designation. The Roadless Rule does nothing to change the wilderness designation process and a particular roadless area can both be protected as a roadless area and recommended for designation as a wilderness. (Organization, Boise, ID - #A8240.25110)

Posing this question [8] as an either/or issue is inadequate. There are various options for management, which still protect roadless values, both in the interim and in the long run. When the Pike and San Isabel revises its management plan we expect them to analyze all IRAs, in addition to other roadless areas proposed by citizens or identified by the Forest Service, for possible Wilderness designation.

The Rule allows the normal administrative, planning and legislative options to be exercised. Implementation of the Roadless Area Conservation Rule would, at a minimum, insure that these areas would not be disqualified from future Wilderness designation by road construction or commercial logging. (Organization, Littleton, CO - #A8829.25110)

#### **TO BEST PROTECT LARGE WILD COMPLEXES**

For the most part, all of these identified roadless areas should be maintained and managed under a formal roadless designation, planning and allocation process. Of course, the forest planning process

should determine wilderness recommendations as required by statute and regulation. The emphasis on wilderness designation should be based on this vibrant literature we have spoken of which suggests formal protection of large wild complexes. The first concern ought to focus on adding large (50,000+ a.) roadless areas contiguous to the large extant designated wilderness (i.e. the High Uintas Wilderness and hundreds of thousands of contiguous roadless lands). Second, adding roadless blocks to other existing wildernesses. Third, protecting as wilderness large roadless areas (50,000+ a., e.g. the 120,000 acre Lakes Roadless Area, the western portion of the High Uintas separated from the HUW only by the Mirror Lake Scenic Highway). Protecting roadless areas should focus on protecting roadless areas and clusters of roadless over or equaling 5,000 acres. (Organization, Hyrum, UT - #A13496.25200)

Roadless areas should be combined with our national forest system and wilderness system to create an expanded biodiversity landmass for animals and human recreation. This human recreation area should be non-motorized. Hunting and fishing should be allowed. Camping should be allowed. Snowmobile use and other off-road vehicles should be banned. (Individual, Tucson, AZ - #A872.45100)

### **1263. Public Concern: The Forest Service should recommend specific roadless areas for wilderness designation.**

We urge you to provide Wilderness protection for much of Alaska's Chugach National Forest. Currently, there is none. Wilderness is good business. Wilderness is sustainable. Please insist that the plan revision include Wilderness protection for the existing Wilderness Study Area, the Big Islands of Prince William Sound (Knight, Montague, and Hinchinbrook), the Copper River Delta and the Kenai Peninsula. (Organization, Seward, AK - #A24021.25000)

Secesh, Needles, and Caton Lake Roadless Areas. These three areas should be considered the South Fork Salmon Wilderness in three units. In the included map, the red areas of each of these units shows where the Ponderosa pine habitat it. These are the lands most coveted by timber interests and the most in need of protection. They also include the greatest number of songbirds, owls, and forest carnivores and are increasingly rare because of the Ponderosa pine type habitat. They include the Secesh (South Fork north) west of Zena Creek and along the South Fork of the Salmon; the Needles (South Fork west) along six mile ridge and beside the South Fork of the Salmon to the north and South of Blackmare Creek; and Caton Lake (South Fork east) along the South Fork of the Salmon and the East Fork of the South Fork Salmon River.

The South Fork north area is, fortunately, little threatened. This area includes the lakes portion of Twentymile Lakes, Loon, Enos, and Jungle Lakes, part of the Secesh River and the South Fork. The only area that is threatened is Loon Lake which is popular with trail bicycles. Quartz Creek on the southeast of the area is another spectacular drainage.

South Fork west is another subject. Sixmile ridge, above Krassel, has been controversial for many years because of its timber potential. Include it in the proposed wilderness and go get your timber in another place. It is sensitive because of its place adjacent to the South Fork and Fittum and Buckhorn Creeks. In addition, the Ponderosa pine habitat is increasingly uncommon and most of this I would say is not in serious jeopardy from fire. The rest of the South Fork west region from Cly Lakes and the Lake Fork watershed and Idler drainage to Nick, Buckhorn and Backmare lakes and the creeks that drain them are shoe-ins for wilderness designation. The Buckhorn drainage is a special case and one that has recently gone from worse to better. A few years ago the main stem Buckhorn Creek "blew out" sediment in a rain on snow storm, carrying much of the road with it. Then the Forest Service chose to close about 6 miles of the road along with pulling out culverts; the "road" is now a trail. Please include this trail in the recommended wilderness. It is roadless at least.

South Fork east (including the Boise NF portion of the Caton Lake Roadless Area) is the lesser known of the South Fork roadless areas and deserves to be wholly designated as wilderness. The area has a myriad of small tributaries and much wild un-traveled area. It contains wolf habitat, endangered salmon and bull trout habitat, and home for mountain goat, cougar, martin, wolverine, goshawk, and three species of grouse (ruffed, spruce, and blue grouse). The Thunderbolt Mountain timber sale illegally cut into this area on the south. (Individual, Boise, ID - #A21369.25200)

**IN CONJUNCTION WITH THE BUREAU OF LAND MANAGEMENT, RECOMMEND ALL ROADLESS AREAS IN OREGON FOR WILDERNESS THROUGH A COMPREHENSIVE STATE WILDERNESS BILL**

By law, new wilderness area recommendations must be proposed by the Forest Service to Congress during the forest plan revision process for possible new wilderness legislation. The 1.9 million acres of inventoried roadless areas in Oregon, plus the remaining 2.9 million acres of unprotected roadless areas on Forest Service and BLM lands should be designated as wilderness through a comprehensive statewide forest wilderness bill. (Individual, Blue Lake, CA - #A3671.25000)

**1264. Public Concern: The Forest Service should manage some roadless areas under specific management prescriptions and some under wilderness designation.**

Roadless areas under specific management or wilderness designation: Some of Both. (Individual, Duluth, GA - #A3724.25000)

Should inventoried roadless areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation, or should they be maintained under a specific designation for roadless area management under the forest plan?

Sounds like both would work—use a blend of the two. (Individual, No Address - #A4497.25000)

Wilderness designation and roadless area protection are not precisely the same, and both designations should be maintained in forest plans. Many roadless areas would be suitable for wilderness designation, but Congress's failure to designate roadless areas as wilderness should not prevent continued roadless management, regardless of wilderness recommendations. (Individual, No Address - #A4777.25000)

***Do Not Recommend Roadless Areas for Wilderness Designation*****1265. Public Concern: The Forest Service should not recommend roadless areas for wilderness designation.**

Should roadless areas selected for protection through forest plan revisions be proposed to Congress for formal wilderness designation? These areas would not meet the criteria for wilderness areas: they have roads running through them and there are signs of man, culverts, ditches, mine shafts, etc. Besides, we have enough wildernesses for people to tramp through now. (Association, Baker City, OR - #A7990.25240)

**BECAUSE ROADLESS AREA CONSERVATION WILL PROTECT THE SAME CHARACTERISTICS THAT MAKE THESE AREAS SPECIAL, BUT WITHOUT ELIMINATING ACCESS**

The AMA believes that to impose further restrictions on areas managed as roadless by proposing them for Wilderness designation would do nothing to enhance the protection of roadless area characteristics. In fact, Wilderness designation would act to reduce the long-term health of some roadless areas by restricting management options. The Roadless Area Conservation Rule prohibits or limits activities that threaten the roadless characteristics of IRA. The FEIS lists roadless area characteristics as: Soil, water and air; Sources of clean water; Diversity of plant and animal communities; Habitat for threatened, endangered, proposed, candidate, and sensitive species, and for those species dependent on large, undisturbed areas of land; Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized classes of recreation opportunities; Reference landscapes; Landscape character and scenic integrity; Traditional cultural properties and sacred sites; other Locally identified unique characteristics. With the exception of some of the characteristic recreation opportunities, these are all attributes commonly associated with designated Wilderness areas. Roadless area conservation will protect the same characteristics that make these areas special and worthy of Wilderness consideration but will do so without eliminating access. (Organization, Pickerington, OH - #A3645.45100)

### **BECAUSE IT WOULD ELIMINATE TOO MANY ACTIVITIES**

These areas should not be proposed for wilderness areas, this would eliminate the area from all activities except horses and hiking, they should have their own designation. (Individual, Denver, CO - #A841.25000)

Don't propose any more land for wilderness designation. It is a ban on man's first invention of note; the wheel. Keep the possibilities open. Don't lock out the future generations, and don't saddle future Americans with lots of rules and public debts, because that is a form of enslavement. (Individual, Burbank, CA - #A18027.25240)

The Idaho Outfitters and Guides Association does not support wilderness management agendas for roadless areas. Wilderness management for these areas would negate much of the recreation opportunity spectrum. Maintenance of trails and other management functions would become more difficult. Mountain bikes, hang gliding, snowmobiling, and affordable outfitted trips are examples of some of the many forms of recreation would be eliminated from Idaho's national forests invoking wilderness management strategies for all roadless areas. (Permit Holder, Boise, ID - #A29589.25240)

I understand that the Snake River and Palisades mountain ranges in Wyoming are designated as "Recommended Wilderness." What I understand this designation to mean is that this area will possibly be designated Wilderness, at which time recreational use of the area by heli-ski operators will be curtailed or terminated. Heli-skiing is a non-intrusive/non-destructive use for public lands. (Individual, Rye, NH - #A26682.25000)

### **BECAUSE IT WOULD ELIMINATE MOUNTAIN BIKING**

A designation of wilderness for these roadless areas would *ban* bikes from using these trails. This would be the worst possible designation and is not acceptable to the mountain biking community. Mountain biking organizations have made huge progress in learning [and] applying appropriate trail design techniques, maintaining existing popular trails, and sharing trails in a socially acceptable manner. Mountain cyclists should not be isolated from other muscle-powered recreational users. Although mountain bikers agree that protection is needed for these roadless areas, a different designation from that of wilderness would be the most appropriate. (Individual, Woodland, CA - #A18071.25000)

### **BECAUSE IT WOULD RESTRICT STATE WILDLIFE MANAGEMENT FLEXIBILITY**

DNR's remaining major concern is over the apparently automatic consideration by the FS of roadless areas for wilderness designation. . . . I want to take this opportunity to firmly state our concern over reduced management flexibility caused by wilderness designation. This apparently default process forces DNR to consider the wildlife management implications of wilderness rather than simply roadless designation for these Georgia tracts. Alternative long-term management options should be available for roadless areas that maintain their current characteristics, but provide more flexibility than wilderness. (State Agency, Social Circle, GA - #A22054.25240)

### **BECAUSE IT WOULD LOCK UP NEEDED NATURAL RESOURCES**

Absolutely not. We should not designate any more wilderness. This should also apply to old growth. We cannot keep locking up our resources—known or yet to be discovered. The risk of being unable to feed, clothe, house, provide energy and provide quality of life for future generations is too great; wise use—yes, sustained yield—yes, BMPS—yes, environmental and science supported activities—yes, wilderness—no! (Business, McBain, MI - #A12006.25240)

### **BECAUSE IT IS ELITIST, FAVORING THE YOUNG AND WEALTHY**

The roadless areas should definitely not be designated wilderness. Only the young and the rich can enjoy the wilderness, leave the forests for the elderly and the poor to enjoy. Every coolie and creek does not have to be accessed, but there should be some for every type of user. (Individual, Bozeman, MT - #A8826.25000)

**BECAUSE THERE ARE ENOUGH WILDERNESS AREAS ALREADY**

While I do not have a problem with some wilderness areas I have to question at what point does it become enough?. I do believe that there is either enough or very close to enough wilderness areas and shutting down more areas to where they become either wilderness areas or essentially wilderness areas is not needed. (Individual, Boulder, CO - #A4480.25000)

[8.] Congressional designation of a wilderness area takes Congressional action to reverse in the event the area is ever needed to be utilized for anything other than wilderness. Do not attempt to set aside any more large tracts of land. Currently, there are millions of acres of roadless designation in the U.S. This is enough. The balance of the forests should be managed under the multiple use concept, as Congress intended. An example would be the Wasatch-Cache National Forest. There are currently 460,000 acres set aside as wilderness. Resource users agreed in 1984 to this size of wilderness designation. This agreement was understood by all parties as being THE number of acres of roadless designation, even before the 1984 Wilderness Bill was passed by Congress, and ever since, the preservationists have been attempting to enlarge the wilderness boundaries with buffers, corridors, and with large tracts of inventoried roadless. Just because the Forest Service has inventoried a tract of land as roadless doesn't mean it is actually "Roadless," or needing special treatment. That is a preconceived error by the Forest Service. We know of areas which have been inventoried roadless that contain private land, early warning stations, natural gas plants, and many old logging or resource roads that are currently being used to access private land or used to access current Livestock Grazing allotments within the National Forest. Enough is enough please leave some forest for sensible renewable resource use and production. (Fire Warden, Uinta County, WY - #A15287.25240)

I personally feel that there is adequate Designated Wilderness already. A simply look at the percentages of land show that approximately 34% of all federally managed land is Designated Wilderness. This doesn't even include many millions of acres of National Park lands that while not Designated Wilderness, are managed as wilderness, or Wilderness Study Areas, which in most cases are managed as Designated Wilderness. However statistics show how few people actually utilize these areas. A balance needs to be developed, and I feel that we are far beyond a balance at the present time with Designated Wilderness winning out. (Organization, Huntsville, AL - #A13542.25240)

8. Should roadless areas selected for protection through forest plan revisions be proposed to congress for formal wilderness designation?

No. The protective provisions of the roadless conservation rule affect nearly three million acres of National Forest System Lands in Region V alone. Approximately 4.1 million acres within Region V are all ready within designated federal wilderness areas. The addition of three million acres of roadless areas managed as wilderness may result in more than a 40 percent increase in the amount of land managed as federal Wilderness throughout the Region, significantly impacting public access to these lands. The immediate protection proposal will result in almost 70 percent of all land within Alpine County being managed as federal wilderness. Consequently, in Alpine County and through the region, access to National Forest System lands will be significantly reduced for those unable to walk or hike, or user groups who desire other forms of transportation not allowed within areas managed as wilderness. (Elected Official, Alpine County, CA - #A8597.25240)

About 18% of Forest Service lands are currently designated Wilderness, more lands have been recommended as Wilderness and are currently managed to prevent impairment of wilderness qualities. Given the Forest Service's multiple-use mandate, 18% is an appropriate amount of Wilderness, and little—if any, more Wilderness should be designated. (Individual, Logan, UT - #A13482.25240)

In conclusion I would like to comment on the proposed 603 wilderness areas. I oppose any more wilderness areas, especially where existing roads exist. We, the public, have given up too much of our public lands already to special interests. (Individual, Bishop, CA - #A3683.25200)

**1266. Public Concern: The Forest Service should not recommend additional specific areas for wilderness designation.**

My state of Montana has an average yearly salary of approx \$22,000 per person. We have lost logging, mining, and ranching as industries and are told we need to depend on tourists who want to “view wilderness and more wilderness.” They can view what we’ve got. That’s enough! (Individual, Kalispell, MT - #A1076.75200)

**1267. Public Concern: The Forest Service should drop recommended wilderness status for roadless areas if Congress fails to act after a reasonable amount of time.**

Wilderness recommendation should not be allowed to let a unit become defacto wilderness in perpetuity. Only Congress can designate wilderness. After a reasonable amount of time, such as a planning cycle, if Congress has not acted, managers must assume that Congress has rejected their recommendation and determine a long-term management direction for the unit other than wilderness. (Business, Lewiston, ID - #A7991.25000)

Identification of a unit of land as an inventoried roadless area must not become a de facto designation, requiring that it be managed forever in some kind of roadless limbo. A thoughtful and definitive decision as to how the unit will be managed must be made once and for all in the forest plan. If the decision is to recommend it for a designation as wilderness, that status must sunset if Congress fails to take action, its inaction in effect rejecting the recommendation. (Organization, No Address - #A8227.25000)

*Wilderness Recommendation Criteria*

**1268. Public Concern: The Forest Service should follow the established legal criteria regarding recommendation of wilderness areas.**

Refer to your policies dictated by Congress for designated Wilderness Areas and use them. (Individual, Bristol, TN - #A1024.25000)

The Forest Service has criteria for designating areas including wilderness areas and the forest plan should address those recommendations for designation. The unique roadless areas may be proposed for wilderness designation, however, most areas should be maintained as roadless in the Forest Plan due to the management flexibility that would provide. (State Agency, Phoenix, AZ - #A17678.25220)

I do not believe this question needs to be addressed. Present law and rules deal adequately with the question. (Individual, Newtown, PA - #A19257.25100)

**FOREST SERVICE HANDBOOK**

The primary type of evaluation of roadless areas should relate to developing recommendations of areas appropriate for Wilderness designation by Congress. The Forest Service Handbook currently includes an entire chapter (Chapter 7) devoted to outlining the factors that should be considered when evaluating inventoried roadless areas. Section 7.23b is devoted to the factors that should be considered. We believe these provisions are adequate for evaluation of roadless areas for wilderness in conjunction with administration of the roadless area conservation rule. (Civic Group, Roanoke, VA - #A1713.25210)

**WILDERNESS ACT**

The ALC believes that areas with wilderness values as defined by Sec. 2(c) of the Act and defined by forest planning should be recommended for classification by the President to Congress. Those areas not so recommended should be released for multiple uses as defined by the 1960 act and subsequent legislation. (Association, Coeur d’Alene, ID - #A11800.25000)

The Forest Plan should make the decision whether or not any area should be recommended to Congress for formal Wilderness designation, recognizing that the Wilderness Act defines clearly those attributes that must be present for such a designation. (Association, Fernandina Beach, FL - #A15466.25230)

**1269. Public Concern: The Forest Service should use the Wilderness Attribute Rating System from RARE I and II if further evaluation is necessary.**

These roadless areas have repeatedly been evaluated for wilderness attributes and found wanting. If any passive management is being considered this should be again evaluated using the Wilderness Attribute Rating System used during the RARE I and RARE II efforts. (Organization, Wenatchee, WA - #A22628.25200)

**1270. Public Concern: The Forest Service should recommend roadless areas for wilderness designation based on location criteria.**

**AREAS THAT ARE ADJACENT TO EXISTING WILDERNESS**

No formal wilderness designation should be given to any roadless area unless it is adjacent and contiguous with an existing wilderness. (Individual, Whitefish, MT - #A5102.25220)

Should roadless areas be proposed to Congress for Wilderness designation?. Yes, undoubtedly, some should. Most tracts of roadless lands border designated Wilderness and would only complement the function of wilderness. . . . We support the ongoing efforts of the High Uintas Preservation Council to add some roadless areas to the High Uintas Wilderness simply because it makes sense. Management would be simplified because there is already a prescription for managing wilderness. (Organization, Vernal, UT - #A20753.25220)

**1271. Public Concern: The Forest Service should recommend roadless areas for wilderness designation based on ecological criteria.**

**AREAS WITH UNDERREPRESENTED LOWER-ELEVATION ECOSYSTEM TYPES**

Little, if any consideration was given for ecosystem representation in previous Wilderness designations, an important factor for long-term sustainability of native species. As a result, 39%, 44% and 37% respectively of all the Pike San Isabel's (PSI's) alpine tundra, barren rock and spruce fir are in Wilderness areas, but only 9% of the PSI's pinion-juniper, 3% of the ponderosa pine and 1% of the sagebrush shrublands are in Wilderness. This skewing toward high elevation ecosystem types put lower-elevation species automatically in less well protected areas, and thus more vulnerable to population decline or potential extinction. (Organization, Denver, CO - #A8824.50100)

We have no confidence in the ability of local forests nationwide to adequately protect what remains of our federal roadless areas. While 427,000 acres of Pike San Isabel inventoried roadless areas are now Wilderness, they are primarily located at high elevations. Additional low-elevations lands must be incorporated in the Wilderness system so that plant and animal species which depend on them can also be protected. In addition only 15% of the remaining roadless areas disallow road construction, and many of the others have extensive motorized trails networks. It is important to protect roadless areas as now across the nation waiting for administrative process to inch slowly toward completion. (Organization, Littleton, CO - #A8829.25210)

Roadless areas need and deserve protection now, regardless of whether they are recommended, now or later, for wilderness designation. Roadless areas that possess values generally lacking in the wilderness system should be recommended for wilderness. Here in Colorado, there is very little acreage below elevation 8,000 feet in the National Wilderness Preservation System. Certain ecosystems are similarly underrepresented in the Wilderness system here. These include: pinyon-juniper, aspen, ponderosa pine, Douglas-fir/mixed conifer, mountain shrubland, and mountain grassland. (Organization, Denver, CO - #A12008.25200)

### **AREAS THAT CONTAIN ENDANGERED SPECIES**

Very little, if any, land should be declared Wilderness. Only lands with clear-cut historical or TRUE species of endangerment (and not their falsely placed fecal matter) should be protected. (Individual, Humboldt, TN - #A464.25000)

### **AREAS THAT ARE ECOLOGICALLY SENSITIVE**

Areas of special natural beauty or areas of particular sensitivity, e.g., riparian desert areas where endangered species thrive, should be proposed to Congress for Wilderness designation. (Individual, State College, PA - #A15450.25220)

### **AREAS THAT ARE 1,000 ACRES OR LARGER THAT ARE ECOLOGICALLY SENSITIVE**

Some very sensitive inventoried roadless areas, 1,000 acres or more, selected for future roadless protection through the local forest plan revision process should indeed be proposed to Congress for Wilderness designation. The expansive Tongass area in Alaska and the small Quartzite Watershed area north of Spokane, Washington, are prime candidates for such proposals. (Individual, Chewelah, WA - #A5453.25200)

## **1272. Public Concern: The Forest Service should recommend roadless areas for wilderness designation based on size criteria.**

### **AREAS OF LESS THAN 5,000 ACRES**

I believe that all roadless areas (even those less than 5,000 acres) should be proposed to Congress for wilderness designation. The language of the Wilderness Act itself provides an adequate and eloquent rationale: Sec. 2. (a) "In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness. For this purpose there is hereby established a National Wilderness Preservation System to be composed of federally owned areas designated by Congress as "wilderness areas," and these shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character." (Individual, Sitka, AK - #A15506.25210)

### **AREAS OF 1,000 ACRES OR MORE**

The Roadless Area Conservation Policy is a good first step to protecting some of the roadless forests in Oregon. But even if the policy withstands congressional, legal and administrative challenges blocking its implementation, 3.1 million acres of roadless areas over 1,000 acres will not be afforded protections by the policy. For the forests included in the policy, logging, road building and other destructive activities could continue, albeit on a limited basis. For these reasons, it is essential that more protections be sought for Oregon's wild forest.

I urge you to do all you can to protect all roadless areas 1,000 acres and greater as Wilderness. Our few remaining pristine forests deserve the most permanent and comprehensive protection we can give them. Wilderness designation is the only way to ensure that these wild forests will remain wild for generations to come. (Elected Official, Multnomah County, OR - #A23662.25200)

### **AREAS OF 640 ACRES OR MORE**

Roadless areas that are larger than 640 acres should be proposed for wilderness designation. Roadless areas smaller than 640 acres should be evaluated for wilderness designation or other status. (Individual, Petrolia, CA - #A27839.25220)

### **5,000 ACRES IN THE WEST, 1,000 ACRES IN THE EAST**

Everything over 5,000 acres west of the Mississippi and 1,000 acres east of the Mississippi in designated roadless areas should be considered for wilderness listing. (Individual, Little Rock, AR - #A27507.25220)

**1273. Public Concern: The Forest Service should recommend roadless areas for wilderness designation based on practical management criteria.****AREAS THAT ARE LARGE ENOUGH TO MAINTAIN THE ROLE OF FIRE WITHOUT THREATENING MANAGED AREAS**

Wilderness consideration should only be given to areas of adequate size to truly be a wilderness where all natural and biological functions can progress without unduly influencing other managed areas. These functions must include the role of wildfire. The proposed wilderness must be large enough so that wildfire, under the planned prescriptions, can play its natural and historic role. (Individual, Evergreen, CO - #A19178.25200)

**AREAS THAT CONTAIN NO ROADS**

For the areas that truly do not have roads (which are few and far between in most cases) should truly be classified as wilderness with no fires, no motorized vehicles, no hunting, no fishing, etc. For the areas that actually have roads which you are attempting to classify as roadless, they should continue to be managed as they have in the past with the exception that more education for the user of the area is needed (the public who owns the land). (Individual, No Address - #A356.25220)

Wilderness areas designation is a big farce and should be stopped. Many wilderness areas have been established so as to appease special groups, they have been established for political ploys, and have even been established just to prevent anyone from accessing the areas across someone's back yard. Wilderness areas should be reserved for those areas that have no existing roads, are in fact pristine (and not just with potmarked desert hills eroded through the acts of nature or scrub brush that is nothing more than a fire hazard). (Individual, Maricopa, CA - #A3732.25000)

Another comment I have here is if a given area is going to be proposed as wilderness, why make it roadless first???? Let's just cut to the chase and do it now and do it right!!! If there are roads in a given area, then it is NOT roadless it is NOT wilderness and it should NOT be proposed as such!!! Wilderness has its place, but let's don't call an area wilderness if in fact it is not! I feel wilderness is far too restrictive by and large. If there are roads in a given area, then I understand wilderness policy the land/area does NOT qualify! (Individual, Ogden, UT - #A590.25000)

**1274. Public Concern: The Forest Service should recommend previously overlooked roadless areas for wilderness designation.****BASED ON CHANGES IN FOREST CONDITION, PUBLIC VALUES, AND SCIENTIFIC UNDERSTANDING**

Contrarily to the tone and content in the ANPR, as well as general perceptions in the PSI, our organization, along with many others in Colorado, believe that these remaining roadless areas have great potential for Wilderness designation. On the Pike and San Isabel, we have identified at least 550,000 acres that meet all the Wilderness criteria used by the USFS. Most of this is found in the 669,000 acres of IRAs, and some is in adjacent and/or contiguous unroaded areas. While the Forest Service continues to believe that the findings of RARE II and decisions in the 1984 LRMP forever dismissed these areas as potential Wilderness, we respectfully disagree. Public perceptions, the science of conservation biology, new management priorities and techniques and evolving forest conditions have changed the very nature of evaluation of potential Wildernesses. (Organization, Denver, CO - #A8824.25200)

All roadless areas should be evaluated as to their wilderness potential and recommendations made to Congress for wilderness designation. Areas in particular, such as Pelican Butte, which were originally intended to be included in an adjacent wilderness area should be reevaluated for wilderness designation. (Individual, Klamath Falls, OR - #A5118.25220)

**1275. Public Concern: The Forest Service should continually reevaluate roadless areas for wilderness characteristics.**

**MAKE NEW RECOMMENDATIONS EXPEDITIOUSLY**

All Forest Service lands should be continuously evaluated for Wilderness characteristics. When found, areas should be designated as wilderness in the most expedient manner. (Individual, Santa Fe, NM - #A18167.25220)

*Management of Roadless Areas That Do Not Meet Wilderness Criteria*

**1276. Public Concern: The Forest Service should collaborate with organizations regarding management of areas not suitable for wilderness designation.**

Some roadless areas should be proposed for formal wilderness designation. For other areas, the Forest Service should work with organizations such as the Alliance for the Wild Rockies, which is trying to establish connecting biological corridors for wildlife throughout the west, yet allow multiple use in some areas. Such joint ventures would encourage hunting, fishing, and other non-motorized outdoor recreational activities. (Individual, Tucson, AZ - #A872.25000)

**1277. Public Concern: The Forest Service should maintain areas that do not qualify for wilderness under a roadless category.**

Some should be wilderness and some should not. It has been said many times lately. There is great value in maintaining roadless lands as a category between wilderness and general road use. (Individual, Grangeville, ID - #A830.25220)

Wilderness designation. Wilderness offers the strongest protection for our remaining wildlands. However, we do not feel that wilderness designation is necessary for the protection of all roadless areas in light of the protections offered by the Roadless Rule. Decisions about recommending wilderness designation can, and indeed must, be made through forest planning. All roadless areas must be evaluated for potential wilderness designation during forest planning by law. The Roadless Rule does not interfere with this process. Roadless areas not selected for wilderness protection should be managed under forest plans in a manner consistent with the Roadless Rule, with additional protection from motorized off-road vehicles. (Organization, Washington, DC - #A18031.25000)

Where roadless areas are large or where they adjoin existing wilderness, they should be considered for wilderness designation. Otherwise, they should be managed for minimal interference in their own specific designation. (Organization, Washington, DC - #A18031.25220)

**TO ALLOW MECHANICAL FOREST MAINTENANCE EQUIPMENT, BUT NOT ROADS OR RESOURCE EXTRACTION**

The most precious of the 58.5 million acres should be designated Wilderness Areas. The rest of the 58.5 million acres should be designated "Roadless Areas," where mechanical forest maintenance equipment is allowed but where roads or resource extraction are not allowed. In-good-faith obedience to the spirit of the rulemaking-ecological preservation-should guide the drawing of policy details. (Individual, No Address - #A117.25220)

**TO PROTECT THESE AREAS FROM COMMERCIAL DEVELOPMENT**

All roadless areas do not need to be designated wilderness. Wilderness should be reserved for those special areas that have specific environmental resources that need specific protections. The current Roadless Area Conservation Rule would allow access, such as mountain bikes, that would be excluded by wilderness designations. We need to protect the forests from commercial development and destruction while allowing the American public to continue to use and enjoy their lands. (Individual, Reno, NV - #A5110.25220)

**1278. Public Concern: The Forest Service should drop areas not eligible for wilderness designation from roadless status.**

In the process of doing EISs of individual areas, wilderness status should be considered. If an area is found to be of wilderness quality it should be recommended to congress to be included in the wilderness system. If it does not qualify for wilderness status it should be dropped from roadless status. When this process is completed there should be no roadless areas. (Individual, Miami, AZ - #A880.25220)

**IN ORDER TO FULFILL THE FOREST SERVICE GOAL OF MULTIPLE USE**

Roadless area designation was a holding status, made during the 1980's to provide more time to determine whether or not they should be considered further for Wilderness status. Now, these areas should either be designated as Wilderness, for which most will not qualify, or put into the full planning process, so that the Forest Service goal of multiple-use can be fulfilled. (Elected Official, Plumas County, CA - #A4846.25220)

**1279. Public Concern: The Forest Service should assign different designations to areas that do not qualify for wilderness status.****GENERAL FOREST**

Everything that is not Wilderness should be "general forest." (Individual, No Address - #A14054.25000)

**NON-MOTORIZED PRESCRIPTIONS CONSISTENT WITH THE ROADLESS AREA CONSERVATION RULE**

Roadless areas are appropriate to consider and recommend for Congressional Wilderness designation. Wilderness offers the strongest protection for our remaining wildlands. However, we do not feel that wilderness designation is necessary for the protection of all roadless areas in light of the protections offered by the Roadless Rule. Decisions about recommending wilderness designations can, and indeed must, be made through forest planning. All roadless areas must be evaluated for potential wilderness designation during forest planning by law. The Roadless Rule does not interfere with this process. Roadless area not selected for wilderness protection should be managed under forest plans in a manner consistent with the Roadless Rule, with additional protection from motorized off-road vehicles. (Organization, Washington, DC - #A22129.25000)

***Relationship of Roadless and Wilderness Management*****1280. Public Concern: The Forest Service should bear the burden of proof that roadless areas should be entered.**

I don't feel that all of the remaining roadless areas should be made wilderness. I do feel, however, that the burden of proof should be shifted—from the public to the Forest Service. The public should not have to demonstrate the value of the roadless area to the Forest Service every time the Forest Service wants to build a new road. Rather, the Forest Service should have to demonstrate the value of a road every time they want to build a new road. Roadless areas would remain roadless unless extenuating circumstances caused a majority of public comments to change the roadless designation. By extenuating circumstances, I don't refer to some insect outbreak, development interests, or some other weak excuse for logging in roadless areas. (Individual, Nickelsville, VA - #A30521.25120)

**1281. Public Concern: The Forest Service should manage roadless areas to preserve wilderness characteristics.**

The law and responsible stewardship requires evaluation for official Wilderness status. Roadless areas must be managed as de-facto Wilderness. (Individual, San Jose, CA - #A6276.25100)

These roadless areas are among the last remaining tracts of de facto wilderness within USFS lands. While de facto wilderness lands are not managed as federal Wilderness Areas, as you well know, federal Wilderness Areas are created out of de facto wilderness lands. Less than five percent of the land mass of the United States exists as federally designated Wilderness Areas. The Roadless Area Conservation Rule

is a landmark rule because it sets aside a protected pool of de facto wilderness out of which future Wilderness Areas can be created. (Individual, San Jose, CA - #A17367.25200)

#### **TO ENSURE THAT THEY CONTINUE TO QUALIFY FOR CONGRESSIONAL DESIGNATION**

As presently constituted, the Rule allows for Wilderness considerations to continue through the normal administrative, planning and legislative channels. Implementation of the Roadless Conservation Rule would, at a minimum, insure that these areas would not be disqualified from future Wilderness designation by road construction or commercial logging. The important thing is leave options for Wilderness open, for once these areas are roaded they are potentially disqualified for this protection for perhaps hundreds of years. (Organization, Denver, CO - #A8824.25110)

Ultimately, when the individual forest plans are updated, the roadless areas with wilderness characteristics will be evaluated for wilderness designation. (36 CFR 219.17). Until that time, and with regard to the roadless areas that may be proposed for designation other than wilderness, the Roadless Area Conservation Policy should be implemented as promulgated in order to preserve the roadless values that currently exist. (Individual, Eugene, OR - #A15583.25100)

Good information is important to Congress when it makes decisions to protect areas under the Wilderness and Wild and Scenic Rivers Acts. Many areas in Colorado that are still roadless are worthy of protection and deserve this protection because of the uses and values these lands provide. Over thirty years ago the courts handed down the East Meadow Creek decision that said in some cases the Forest Service must reserve the final decision on wilderness designation for the Congress and could not preempt the options of the Congress by administrative fiat. The creation of RARE II after the inadequacies of RARE is another case where the courts found value and importance in how decisions were made about roadless lands. The Roadless Area Conservation Rule is a continuation of this traditions of conservative decision making in regard to this precious natural and economic resource. (Elected Official, Fort Collins, CO - #A13297.25000)

#### **TO PREVENT OFF-ROAD VEHICLE USE AND MOTORIZED TRAILS FROM THREATENING RECOMMENDED WILDERNESS STATUS**

The appropriate role of local forest planning is to implement the Roadless Area Conservation Rule across the forest and evaluate all projects within that context. We further believe that the local forest planning must consider immediate protection for some of these areas to protect their unique qualities from such things as environmental damage from off-highway vehicles and motorized trails, a particular problem across Colorado and the PSI. When the forest plan is revised, the Pike and San Isabel will be required to analyze citizen recommended and inventoried roadless areas for potential Wilderness designations. Since more than 500,000 acres of the IRAs meet all wilderness criteria, we are concerned that they may be disqualified unless they are protected now. (Organization, Littleton, CO - #A8829.25000)

#### **BECAUSE RECREATION PRESSURES HAVE BECOME INTENSE AND DAMAGING**

Maintain them as de facto wilderness under agency-wide protection. If this means that future administrations could change agency rules and put these areas at risk, then legislation needs to be pursued which would require Congressional consideration of these areas for official wilderness status before rule changes could take effect. In this scenario, Congress would be unable to “deselect” an inventoried roadless area. We need to avoid the creation of “billboarded” wilderness, because recreation pressures have become intense and damaging. (Individual, Flagstaff, AZ - #A5026.25200)

#### **BY ALLOWING ONLY ACTIVITIES SUCH AS HIKING, HORSEBACK RIDING, AND HUNTING**

The areas should be treated as wilderness areas allowing only traditional activities such as hiking, horseback riding and hunting. (Individual, Winchester, VA - #A378.25120)

#### **BY MANAGING THEM AS WILDERNESS WITH RESPECT TO FOREST HEALTH TREATMENTS**

Inventoried roadless areas should be managed similarly to wilderness areas when it comes to protecting them from severe wildfires and insect and disease outbreaks. (Individual, Laramie, WY - #A1.25200)

**BY TREATING FIRES ONLY WHEN THEY THREATEN STRUCTURES OR HUMAN LIFE**

Existing roadless areas should be managed like wilderness areas: where active fires threaten structures or human life, action may be warranted. However, any attempts to thwart the implementation of the roadless ban on the grounds of “forest health” are an obvious attempt to mislead the public as to the current administration’s real aim—gutting the roadless ban. Insects and diseases are a natural part of forest ecosystems, and only become a major concern when the management objective becomes resource extraction, not ecological function. (Individual, No Address - #A5224.25220)

**1282. The Forest Service should manage roadless areas to preserve wilderness characteristics.****BECAUSE WILDERNESS AREAS CONTRIBUTE TO THE SOCIAL, ECONOMIC, AND ENVIRONMENTAL VALUES OF A REGION**

As for activities that should be allowed in roadless areas, the Forest Service should use management of Wilderness Areas as a guide. Many Wilderness Areas contribute greatly to the social, economic and environmental values of a region. We were in Pinedale, Wyoming, on our way to the Bridger Wilderness, we spoke to many local folks in a small restaurant who bent over backwards to suggest hiking routes, good fishing spots, or just a pretty place to see. (Individual, No Address - #A4523.25000)

**1283. Public Concern: The Forest Service should manage areas recommended for wilderness designation to preserve wilderness characteristics.**

Roadless Areas recommended for wilderness designation in forest plans should be managed to retain wilderness values and should be managed as Wilderness, under the rules and regulations of the National Wilderness System. (Organization, Boise, ID - #A20363.25230)

**1284. Public Concern: The Forest Service should keep all roadless areas unroaded regardless of recommended wilderness status.**

By law, forest plans must evaluate the wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. The rule allows the wilderness recommendation process to continue. Forest plans also designate roadless areas for continued roadless management, regardless of whether they are recommended for wilderness. The rule ensures that roadless areas will, at a minimum, be protected from road construction and commercial logging. Recommending roadless lands for additions to the National Wilderness System should not preclude immediate protections for these places. (Organization, Nevada City, CA - #A4941.25100)

Wilderness designation is preferable, with emphasis on greater connectivity of existing protected areas. But this is not to say that such decisions should be made on a “now or never” basis, i.e. current roadless areas should remain roadless, regardless of whether or not they are deemed appropriate for wilderness designation at this time. (Individual, Corvallis, OR - #A650.25200)

**1285. Public Concern: The Forest Service should maintain inventoried roadless areas in the same condition as they appeared when inventoried.**

No change in roadless protection can occur until Congress determines whether an area is unsuitable or suitable based upon prior recommendations to Congress. Under the forest plan, Inventoried Roadless Areas must be maintained in exactly the same condition as they appeared when inventoried. The agency has an equal obligation to preserve “suitable” characteristics and “unsuitable” (developed/nonwild) characteristics. (Individual, Moab, UT - #A15790.25100)

Each specific Inventoried Roadless Area should be managed individually by inventorying the needs to the area to attain or maintain good forest health, then implementing any projects which can meet the goals set in protecting forest health. The agency has a mandate to preserve Inventoried Roadless Areas in their exact condition as of the date of their designation as Roadless Areas. The 1964 Wilderness Act

and supporting case law requires the agency to preserve Congress' ability to act upon the "suitability" recommendations of the agency. The agency must therefore not only protect areas found "suitability" for Wilderness designation, but must also preserve areas found "non-suitable" for Wilderness designation. Activities which alter the "snap shot" of the IRA which lead to the agency's "suitability" recommendation are prohibited, whether those activities be permanent road construction or road decommissioning, obliteration, or closure. Therefore, the agency is not only permitted to conduct forest health projects, even those such as fuel load reduction through timber harvest, but is required to do so in order to preserve the exact composition of the area. (Organization, Chesapeake, VA - #A11804.25100)

Each specific Inventoried Roadless Area should be managed individually. The agency must preserve Inventoried Roadless Areas in their exact condition as of the date of their designation as Roadless Areas. Activities which alter the "snap shot" of the IRA which lead to the agency's "suitability" recommendation are prohibited, whether those activities be permanent road construction or road decommissioning, obliteration, or closure. Therefore, the agency is not only permitted to conduct forest health projects, even those such as fuel load reduction through timber harvest, but is required to do so in order to preserve the exact composition of the area. (Individual, Des Moines, IA - #A12587.45500)

**1286. Public Concern: The Forest Service should manage roadless areas 5,000 acres or larger as wilderness and allow limited management activities in areas of less than 5,000 acres.**

Roadless areas of 5,000 acres and greater should be managed just like wilderness areas. Areas of less than 5,000 acres should be prescribed burned and maybe some helicopter logging of understory to reduce fuel.

You cannot protect the forest from insect or disease, so management to prevent this is impossible. This has been used as an excuse for massive logging. In areas of 5,000 acres and larger, let nature take its course. In areas of less than 5,000 acres maybe some salvage by helicopter could be done without new roads.

Wildfire is going to happen no matter what you do for management. Allow some fires to burn under prescription and prescribe burn to reduce severity. (Individual, Thompson Falls, MT - #A5643.30100)

**1287. Public Concern: The Forest Service should not manage inventoried roadless areas as de facto wilderness.**

First and foremost, we do not believe that the presence or absence of a road creates a "special place" on the national forests. Areas without roads are not by definition wild or wilderness and should not in every case be managed as if they were. The ecological, physical, and biological attributes present in a particular place best define the values of the national forests. Roads, trails, or other improvements can improve or maintain these values. In many cases, these facilities are necessary if the values are to persist over time, such as in the case of maintaining certain wildlife habitat or access to reduce hazardous fuels. In addition, many of the inventoried roadless areas are not roadless. They have roads, water developments, transmission lines, and in some cases have been previously agricultural land. (Association, Terra Bella, CA - #A15588.45100)

**1288. Public Concern: The Forest Service should not manage uninventoried roadless areas as de facto wilderness.**

**BECAUSE IT IS CONTRARY TO CONGRESSIONAL INTENT**

To manage these lands [uninventoried roadless areas] to maintain options for further roadless inventory is contrary to the Congressional intent relative to roadless areas as expressed during the 1981 designation of wilderness in California. We note the following statement in the Committee Report:

The fact that the wilderness option for roadless areas will be considered in future planning raises the hypothetical argument that the areas therefore must be managed so as to preserve their wilderness attributes so that these may be considered in the future. Such an interpretation, however, would result in

all roadless areas being kept in de facto wilderness for a succession of future planning process. Such an interpretation is obviously incorrect, and if applied, would completely frustrate the orderly management of nonwilderness lands and the goals of the Forest And Rangeland Renewable Resource Planning Act. (Committee on Interior and Insular Affairs, 97th Cong. 1st Sess. Report No. 97-181, p. 45) (emphasis added). See also Committee on Energy and Natural Resources, 96th Cong. 2d Sess., Report No. 96-914, p. 26. (Elected Official, Roseburg, OR - #A11811.25110)

### **1289. Public Concern: The Forest Service should only consider roadless units that have been recommended as wilderness but rejected by Congress through inaction.**

This planning effort to address roadless units should be final, ending the limbo status these units have languished in since RARE I. The only units to be addressed in the future should be those recommended as wilderness, but rejected by Congress through in-action. Otherwise management of these units should be addressed in same fashion as other lands during forest plan reviews and revisions. (Individual, Frenchtown, MT - #A11887.45400)

## **Roadless Designation**

### **Summary**

**General Comments** – The comments provided by the public about the advisability of creating a separate roadless designation echo the broader body of comment about whether or not a national roadless rule should be implemented. In the context of answering Question 8, some ask that the Forest Service clarify to the public that designating roadless areas will not preclude future action by Congress to declare them wilderness. Those who ask that a national rule not be implemented assert that Congress should grant express authority to the Forest Service before any roadless designation is created. Others state that local government consent must be obtained prior to any such designations in any lands covered by the Weeks Act (see also Chapter 5: Forest Management: Roadless Areas General: *Authority for Roadless Area Management*). These respondents also assert that a roadless designation amounts to a de facto wilderness designation by the Forest Service; while those who ask that a national rule be implemented maintain that the Roadless Area Conservation Rule does no such thing, since many more activities are allowed under the Rule than under the Wilderness Act. Some assert that the rulemaking should be dropped because these areas have not been considered or ignored by Congress for official wilderness status. Others assert that this reasoning is not valid due to the slow nature of the political process and the fact that wilderness recommendations follow from the same local planning process that has also so far proved unable to protect roadless areas from entry. Some suggest the Forest Service adopt another term besides “roadless” because it has become too great a political hot potato.

Various respondents also assert that the Forest Service should expand existing roadless areas by restoring and rehabilitating many roaded portions of the National Forest System, especially the roaded portions of inventoried roadless areas. In particular, the low percentage of roadless areas in the eastern United States and in the Appalachians are cited as reasons to broaden a national rule. There are others who believe that a “return to roadlessness” is inappropriate, and some ask that the Agency reduce the size and number of roadless areas to be covered by it.

**Adequacy of Analysis** – Some comments in this section overlap with those in the section on roadless area designation criteria (below) because they emphasize the need for thorough evaluation of roadless areas or provide suggestions for coordinating this effort with forest plan

revisions. A few individuals suggest that large contiguous tracts of wild forest habitat should be reestablished in order to allow natural processes to function, and ask that this be a prime focus of large scale analysis in future planning. Other respondents provide very specific observations regarding the adequacy of the data and analysis used in the Roadless Area Conservation Rule Draft and Final EISs. Some assert in particular that these analyses lack accurate data on private inholdings, school trust lands, and mineral rights within inventoried roadless areas. An organization states that the amount of roadless acreage currently assigned to protective categories in Oregon is inflated, while several county commissioners and other individuals assert that the Forest Service has under-represented National Forest System lands in categories that limit intensive human uses. Other county commissioners request that Appendix C be revised to acknowledge that many inventoried roadless areas have already been determined to be unqualified for wilderness recommendation by the Forest Service.

**Designating Roadless Areas** – Many responses to Question 8 are phrased as a simple statement for or against the advisability of a new roadless management prescription. Other respondents address this topic elsewhere in their comments in the context of broader management direction, for instance as the suggested alternative for management of roadless areas that do not qualify for wilderness recommendation. Some respondents believe that a roadless management category is appropriate—although others state that a wilderness designation would be preferable—or alternatively any existing management category that is consistent with a national rule. Respondents also conclude that creation of a new roadless category is inappropriate, although some do recommend a Backcountry Recreation Area prescription. (See also the section below on designating other new management categories.)

Those who recommend a roadless prescription cite many reasons for employing such a prescription, including the assertion that this is a means to resolve ongoing wilderness controversies. Because this prescription could allow activities prohibited in wilderness areas such as mountain biking, as well as administrative tools such as chainsaws, many state that this category is needed and could be supported by a broader array of recreationists. Some individuals recommend the creation of multiple roadless categories with varying sets of uses in order to best respond to local conditions. Others ask that local forest managers be able to add further prohibitions to roadless management categories. Finally, some ask the Forest Service to create a dynamic roadless designation that adopts an adaptive management approach to best respond to changing environmental and social conditions over time.

Others recommend that a new roadless management prescription not be employed and assert that a separate management category is unnecessary, as well as respondents who generally ask that a national rule not be implemented and therefore also recommend that no type of separate roadless category be employed. Further reasons cited for not creating a roadless category include the belief that roadlessness itself is not sufficient justification for it—that conditions vary too greatly between roadless areas for a single category to be effective; that it will strain agency budgets; and that wilderness areas themselves are not being well managed, so a roadless designation will drain resources and result in similar problems. Finally, some say that road management budget problems should not be used as the justification for roadless designations, and assert that other solutions to financial issues should be pursued.

**Roadless Area Designation Criteria** – Some respondents discuss the overall design and selection of criteria for roadless area designation. A common theme is the request for a clear and specific set of tools to be used in the roadless evaluation process. Others critique the current list

of roadless evaluation criteria found in the Forest Service Handbook and suggest alternatives to be included. Other respondents suggest creating a method for weighting the factors during decisionmaking. One Organization asserts that the current criteria do not work well in the eastern United States, and suggests amending the handbook to take into consideration the specific situations in these regions. Some say that the current criteria reflect wilderness recommendation decisionmaking, but that the Roadless Area Conservation Rule has a different goal from this process. Therefore, they suggest modifications to the handbook criteria in order to meet the goals of the Rule, such as removing the “sights and sounds” criteria and unlinking solitude considerations from recreational opportunity spectrum core area sizes. Finally, a number of respondents ask the Forest Service to make sure that the most up-to-date mapping is used, and that data is ground-truthed for accuracy during the roadless delineation process.

Comments about the criteria that should be used in the roadless designation process vary. Inventory status is one criterion often mentioned by respondents. While some state that a national rule should be limited to inventoried roadless areas only, others say that uninventoried areas should also be covered under a national rule.

Size is another criterion that is widely mentioned in public comment. Some urge the Forest Service to expand the criteria for total acreage to include areas less than 5,000 acres, often citing the acreage cutoff that they consider to be appropriate, such as 1,000 acres. The same respondents also ask that smaller unroaded and uninventoried areas be considered for protection. Other respondents assert that smaller roadless areas should not be considered for protection; one agricultural association suggests that no areas smaller than 10,000 acres should be included. These people say that roadless areas smaller than 5,000 acres, especially uninventoried acres, should not qualify for protection.

Others suggest that acreage alone is less important than proximity to other protected areas, such as existing wilderness areas or National Park Service lands. Still others believe that relative distribution of roadless areas by forest and region should be taken into consideration, with the goal of better balancing the distribution.

Some respondents state that decisions should be based primarily on ecological characteristics, asserting that the current National Wilderness System does not adequately represent many ecotypes, especially those found at lower elevations.

Infrastructure and historic human uses are also frequently mentioned as criteria by which to evaluate roadless areas. Respondents ask that the Forest Service ensure that any inventoried roadless areas with existing roads or other infrastructure be excluded from the Rule. Some request that any roadless areas adjacent to private property be excluded, while others say that any areas with valuable natural resources should be disqualified. Several add that any existing infrastructure should not disqualify a roadless area from protection, especially if the roads are user-created or have been closed. Others request that roadless areas be included for protection despite historic motorized use of a given area, and some ask that roaded areas be rehabilitated and returned to roadless status.

## *Roadless Designation General*

### **1290. Public Concern: The Forest Service should clarify that designating areas to a roadless management category does not preclude future designation as wilderness.**

Question #8—This question is confusing. I would offer forth that the designation of any tract of forest as a “roadless area” should not be construed as to prohibit its future designation as a wilderness area. (Individual, No Address - #A7184.25000)

### **1291. Public Concern: The Forest Service should implement a national roadless rule to maintain wild and scenic river eligibility for streams in roadless areas.**

A protected forest has protected streams. The river we cross when entering our land is the upper Hoback River. Two segments of it have been found eligible for inclusion in the National Wild and Scenic Rivers System. The higher segment is eligible for the designation of Wild. Altogether, segments of more than 30 streams on our Bridger-Teton National Forest have been found eligible. The ones eligible for Wild are, by necessity, located in roadless (if not Wilderness) areas. Roadless areas protect the criteria that identify Wild NW and SR candidates. (Individual, Bondurant, WY - #A15465.25350)

### **1292. Public Concern: The Forest Service should not create special roadless designations without legislation from Congress.**

Those areas with wilderness values as defined by the act of 1964 should be so recommended to Congress by the President. Under the forest plan these areas can be managed for their wilderness values until Congress acts. Areas not meeting the values defined by Sec. 2(c) of the act should be managed under the Multiple-Use Sustained Yield Act of 1960 and other authorizing statutes. The forest plan should recognize that there are areas requiring special management; however, there should be no specific designation for roadless areas without legislation by Congress. (Individual, Moscow, ID - #A5380.25320)

### **1293. Public Concern: The Forest Service should obtain the consent of local counties before designating any lands purchased under the Weeks Act as roadless.**

The DEIS (3-13) noted that the Weeks Act of 1911 allowed the Forest Service to purchase lands in the Eastern United States, however 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. (Elected Official, Roseburg, OR - #A11811.25000)

### **1294. Public Concern: The Forest Service should not create de facto wilderness through roadless area designation.**

In 1964 the Wilderness Act was passed and signed into law. Congress required that the Forest Service and the Bureau of Land Management inventory their lands and recommend to Congress the areas that should be wilderness. This was done. Now comes Clinton and makes de facto wilderness by declaring roadless areas. This is wrong. (Individual, Miami, AZ - #A880.25200)

Wilderness designation and public lands management are the responsibility of the U.S. Congress. Implementation of the proposal of lock up millions of acres, including roaded lands, will for all practical purposes create de facto wilderness. Science cannot be used for justification of such action. Sound science is not biased and is not based on unchallenged biological opinions. Under current law the Forest

Service and BLM are mandated to consider the heritage, customs and culture of communities adjacent to public lands. They are still mandated to be “stewards of our resources,” not “restorers of some utopian concept of what those resources once were.” (State Representative, State of Montana - #A18045.25110)

**1295. Public Concern: The Forest Service should emphasize that the Roadless Area Conservation Rule does not create de facto wilderness.**

**BECAUSE FAR MORE ACTIVITIES ARE ALLOWED**

The Roadless Area Conservation Rule prohibits road construction, reconstruction and timber harvest (with exceptions) within inventoried roadless areas, while excepting road reconstruction needed for road safety improvement and Federal Aid Highway projects. This is considerably different from management direction associated with Wilderness Areas. A great many there management activities may be allowed in roadless areas that would otherwise be prohibited in Wilderness Areas.

The Rule, therefore, is not a substitute for Wilderness designation. The Rule provides direction for road construction and timber management activities for roadless areas that are not designated or recommended for Wilderness designation. Roadless Areas that are identified in the Roadless Area Conservation Rule as well as additional areas that may be identified in future plan revision processes should be managed under prescriptions consistent with the prohibitions and exemptions defined in the Rule, and they should be evaluated for recommendations to Congress for inclusion in the Wilderness Preservation System during each plan revision cycle as required by law. (Organization, Damascus, VA - #A17723.25100)

**1296. Public Concern: The Forest Service should consider that since many roadless areas have not been recommended for wilderness, a national roadless rule is unwarranted.**

**ON THE NATIONAL GRASSLANDS**

While the Forest Service emphasizes that the National Grasslands have been studied for wilderness since 1972, the Forest Service must also acknowledge that each and every time the agency itself recommended against wilderness management. This is a highly significant fact that supports the position of the counties that no wilderness designation or roadless management is appropriate. The public record provided information omitted by the Forest Service proving that there has been no change in the facts or resources. The Forest Service’s unstated change in policy cannot make roaded lands roadless, cancel mineral leases and royalty rights, or revoke easements and public roads. These lands simply do not meet the statutory definition of roadless or wilderness and must be managed consistent with the purposes for which the United States originally acquired these lands. (Organization, Denver, CO - #A21358.25240)

**1297. Public Concern: The Forest Service should reject the argument that many roadless areas do not deserve protection under a national roadless rule.**

**BECAUSE THEY HAVE NOT YET BEEN RECOMMENDED FOR WILDERNESS**

Assertion: many inventoried roadless areas were not recommended for wilderness. This is plainly true but irrelevant to Roadless Rule revision for three reasons. First, the Rule does not create wilderness, allowing as it does many activities and forms of management, including ORV use. Second, protection as wilderness is a reason not to protect (redundantly) through administrative rule rather than a reason to do so, so the failure to protect as wilderness cannot, analytically, be a reason against administrative protection. And third, the wilderness recommendations were themselves a product of the same NFMA planning process whose shortcomings necessitated the Roadless Rule, so their failure cannot serve as a basis for rejecting the Rule. (Organization, Olympia, WA - #A20145.25200)

### **1298. Public Concern: The Forest Service should follow the model used in the Olympic National Forest Plan.**

#### **WITH RESPECT TO ROADLESS AREA DESIGNATION AND MANAGEMENT**

I was a participant in the preparation of the Olympic National Forest Plan in 1978-1980. We identified the roadless areas on the forest that met the criteria for potential Roadless Area designation at that time. We attempted to display the characteristics of these areas and the potential environmental effects of designating and managing these areas under the Roadless Area classification. I believe that this approach is still valid and appropriate for these areas. (Individual, Olympia, WA - #A278.45100)

### **1299. Public Concern: The Forest Service should use other terms instead of "roadless."**

#### **USE "RESERVE"**

If the Forest Service feels it must have a separate name or a transition term, lets refer to the land as "reserve" instead of "roadless." (Business, McBain, MI - #A12006.25300)

#### **USE "WILD"**

On a secondary note, let's start calling these areas "wild" instead of "roadless." The roadless designation still defines these pieces of wild country in relation to vehicles and our ability to gain access. Let's show the wild some respect. It is worth talking about and loving in its own right, not simply because there aren't any roads there. (Individual, Jackson, WY - #A16263.25300)

### **1300. Public Concern: The Forest Service should increase roadless areas.**

Please do not amend rules about roadless forests to allow road building, logging etc. On the contrary, I feel roadless areas should be expanded. Carving up roadless areas doesn't make sense even to Republicans like me. (Individual, Lancaster, PA - #A7030.10150)

I urge you to seek other areas that may also qualify as roadless and to extend protections to them. (Individual, Lansdale, PA - #A611.10160)

#### **BY REMOVING ROADS IN CURRENTLY ROADED, HIGH INTEGRITY AREAS TO MAXIMIZE THE BIOLOGICAL AND ECOLOGICAL IMPORTANCE OF THE FINAL SUITE OF PROTECTED AREAS**

To maximize the biological/ecological importance of the final suite of protected areas, the roadless policy should require the use of carefully prioritized road removal - followed by inclusion in the roadless protection program - for all high integrity areas.

In other words, we strongly request that the universe of areas to be considered for final roadless protection not be limited to those areas currently roadless, but include those areas that if restored to roadlessness would achieve the greatest biological and ecological integrity should be considered for immediate road removal followed by inclusion in the roadless area protection program. (Business, Coarsegold, CA - #A1589.45400)

#### **BY EVALUATING OTHER UNROADED AREAS FOR POSSIBLE ROADLESS DESIGNATION**

The regulations should provide authority for Forest Supervisors to evaluate other areas for consideration as Roadless designation and management only in the case where such areas are "unroaded". Unroaded should be defined as any area which does not contain any roads (whether such roads are categorized as classified, unclassified, or uninventoried) or motorized trails. (Organization, Chesapeake, VA - #A11804.45512)

#### **BY MAKING ROADLESS AREAS AS LARGE AS POSSIBLE**

The real problem is not in giving protection to these ancient remnants. The real problem is that they are not large enough. In every case, they were reduced in size because of specious ideas about buffer zones, and what constituted roads. Every one of the areas in the two Carolinas should be expanded to bring their boundaries out to the nearest roads that presently are in daily use. The guiding principle of the

Forest Service should be how can it make these areas as large as possible; not how can it reduce them in size as much as possible. (Individual, Walhalla, SC - #A6292.45300)

#### **BY RESTORING LANDS TO THEIR ROADLESS CHARACTER**

A key element has been entirely missing from your questions and from the Advanced Notice in particular. At no point do you address the issue of rehabilitating former roadless lands to return them to an essentially roadless character. The national dialog concerning roadless areas is inherently flawed if it does not take into account the desirability of establishing procedures and mechanisms for identifying areas to be converted back to a roadless status. Public resources would be far better spent on increasing our bank of roadless lands than in meddling with the remnant of roadless that remains. Obvious candidate areas for such rehabilitation include lands that were identified as roadless in RARE II but have since been degraded by logging or similar intrusions. Other obvious candidates would be relatively small areas of disturbance that separate existing roadless areas, especially when some of those roadless areas are below 5,000 acres in size. Until we start examining in earnest the need to expand the amount of our National Forests that is fundamentally roadless, we will only be looking at half of the question. (Individual, Pendleton, OR - #A30482.45000)

Our property is bordered on three sides by the 1.1 million acre Winema National Forest. Of that 1.1 million acres a mere 32,200 acres or 2.97% would be managed under the Roadless Area Conservation Rule. It is my belief that this is not enough, especially given the fragmented and disconnected nature of roadless areas in the Winema. Steps should be taken to restore National Forest Lands wherever possible to connect these smaller roadless areas. The Winema should draft a long term plan which would increase land managed under Roadless Area Conservation to 10% of its total area. Water quality and quantity is the most important issue in the Klamath Basin. Pelican Butte is a Teir II Watershed and is recognized as a significant source of the highest quality water entering Upper Klamath Lake. It is also a critical element in the ecological health of the Upper Klamath Marsh and Wildlife Refuge. Pelican Butte would also become the largest continuous roadless area in the Winema National Forest and must be provided the highest level of protection afforded under Roadless Area Conservation. (Individual, Klamath Falls, OR - #A4970.45622)

#### **1301. Public Concern: The Forest Service should address the low percentage of roadless acreage in the southern Appalachians relative to the national average.**

In Southern Appalachians generally, the roadless areas inventoried by the U.S. Forest Service comprise only 15 percent of national forest land. That's well below the national average of 31 percent. The Southeast is one of the fastest growing regions, putting more people pressure on national forests than anywhere else in the country. In this region the growing dilemma is more people clamoring for use of the national forest, but fewer acres to accommodate them. (Civic Group, Nashville, TN - #A10552.10111)

#### **1302. Public Concern: The Forest Service should not expand roadless areas by restoring roaded areas.**

The concept of **reversion to roadless** as described by Mr. Shea in his published article and as written to me by staff of HCCA is contrary to the spirit of this process. (Individual, Littleton, CO - #A13845.45100)

#### **1303. Public Concern: The Forest Service should reduce the number and size of roadless areas proposed.**

"Cut back on the number of 'roadless areas.' Do we really need as many as proposed? Don't be so 'stiff' on not allowing roads in 'roadless areas.' You can 'soften regulation' if you choose." (Individual, No Address - #A834.45100)

I oppose all roadless areas as they block use from motorized trail users. Please reduce the size of the existing roadless areas and do not create any more. Please do not enact any of the ‘Clinton roadless areas.’ (Individual, White Salmon, WA - #A16469.10000)

## *Adequacy of Analysis*

### **1304. Public Concern: The Forest Service should evaluate roadless areas to see if they are large enough to serve as viable repositories of our natural heritage.**

#### **PLACE EMPHASIS ON ENLARGING OR LINKING ROADLESS AREAS THAT ARE TOO SMALL TO SUPPORT HEALTHY FORESTS**

How should inventoried roadless areas be managed to provide for healthy forests? After a century of misguided policy, it is nearly impossible for human intervention to restore the forests to their former health. The best we can do is leave them be. Eventually nature will restore a balance, if the roadless area is large enough. Roadless areas should be evaluated to see if they are large enough to serve as viable repositories of our natural heritage. Emphasis should be put on enlarging or linking roadless areas that are too small to support healthy forests. (Individual, Albuquerque, NM - #A13459.30100)

### **1305. Public Concern: The Forest Service should include assessments that would qualify or disqualify each inventoried roadless area for such status.**

#### **AS PART OF EACH FOREST’S NEXT SCHEDULED FOREST PLAN REVISION PROCESS**

Each National Forest’s Plan must, as a part of its next scheduled revision, include assessments that would “qualify” or “disqualify” each inventoried roadless area for such status. Those qualifying inventoried roadless areas would then be explicitly depicted on maps. Strict attention must be paid to road classifications in and around roadless areas by means of lists and maps of classified, unclassified and old obliterated roads. Based on local citizen input, establish a spectrum of active forest management methods and protection/preservation guidelines and, when applicable, assign them to each “qualifying” inventoried roadless area. (Organization, Moscow, ID - #A15318.45500)

### **1306. Public Concern: The Forest Service should ensure that the roadless area evaluation process accurately presents land ownership and mineral rights information.**

As further evidence that process alone will not result in better decisions within the Forest Service, one need only look at the FEIS treatment of the roadless conservation areas. In 1987, when the Forest Service issued the Custer Forest Plan, the Forest Service identified both inholdings, such as state school sections and mineral rights, and roads. The 1999 Draft Plan Revision and the 2001 FEIS completely omit these significant interests which would otherwise disqualify these areas for roadless management. The Bell Lake RCA was described as having no inholdings, FEIS, App. C 28-34, while the Custer Forest Plan shows that there are 365 acres of mineral rights and 1,120 acres of state lands. Custer FEIS, App. C 241-250. These interests still exist within the Bell Lake RCA but are omitted from the FEIS.

The extensive inholdings and mineral rights, as well as oil and gas leases, directly affect any determination that these areas can be managed for wilderness or to protect their natural qualities. While the roadless rule did not do a site-specific analysis, the DPG FEIS claims to have done so. Unfortunately, the DPG FEIS omits many of these factors. Process alone will [not] result in all of the information being considered. (Organization, Denver, CO - #A21358.45618)

### **1307. Public Concern: The Forest Service should correct errors in forest roadless statistics that inflate the acreage of inventoried roadless areas and non-motorized categories.**

Oregon Cascade Roadless Area. The FEIS assumes that 75,000 acres of the Umpqua are designated inventoried roadless areas. This is incorrect. The 75,000 acres include the Oregon Cascade Recreation Area. In the Umpqua NF, the OCRA outside wilderness is 35,000 acres—almost half of the Umpqua’s

claimed “designated roadless.” However, of these 35,000 acres in the Umpqua, 26,100 acres are open to motorized vehicle all winter (zone 3, 5, and 6) and 16,700 acres are open to motorized vehicles all year long (zone 3 and 6) Of the 75,000 acres that the Umpqua NF claims is designated roadless, almost one quarter sustains motorized vehicle traffic all year long—on and off designated roads *increases* in “roadless” areas.

Clearly to properly analyze the effects of protecting roadless areas, the Umpqua National Forest must correctly assess its current roadless area figures. These 26,100 acres in the OCRA are not currently protected. The Proposed Rule is our best opportunity to afford the protection they not only deserve and the protection that the Umpqua National Forest claims they already have. (Individual, Roseburg, OR - #A19127.45620)

**1308. Public Concern: The Forest Service should accurately list all National Forest System acreage included under management categories emphasizing environmental protection.**

**TO ALLOW THE PUBLIC TO MAKE INFORMED COMMENT**

Page 3-1 of the DEIS states that 28% of the National Forest System is within inventoried roadless area, 22% is within Wilderness, National Monument, Wild and Scenic River or some other similar designation that the remaining 50% is managed for other uses which by implication includes road construction and reconstruction. This DEIS statement is misleading in that it ignores that the majority of the forests in Oregon are managed as late succession reserves, spotted owl habitat, riparian buffers and other similar land classification. To present an accurate picture of the land management status, it would be more appropriate to include all land management [in] each of these classifications. Absent this information the public does not have the opportunity to knowingly comment on the proposed action. (Elected Official, Roseburg, OR - #A11811.25000)

**1309. Public Concern: The Forest Service should revise the Roadless Area Conservation Rule Final EIS Appendix C to acknowledge that many roadless areas do not qualify for wilderness status.**

Appendix C of the FEIS does not acknowledge that the Forest Service made specific findings that these units did not have wilderness characteristics and did not qualify for wilderness. This was true for each of the roadless conservation areas. The FEIS omits this material information and fails to address how these badlands could be disqualified from wilderness due to roads, state lands, and range improvements and now qualify when these interests are still there. (Elected Official, McKenzie County, ND - #A27737.25100)

**1310. Public Concern: The Forest Service should recognize that science does not support the idea of resource protection through roadless designation.**

The idea of increased resource protection through roadless designation is unrealistic. Past practices and current science demonstrate that roadless areas do not ensure proper land stewardship. (Association, Boise, ID - #A20607.14500)

*Do Designate Roadless Areas*

**1311. Public Concern: The Forest Service should remove all wilderness designations and use a modified roadless designation.**

Remove all ‘Wilderness’ designation, and use a modified ‘roadless’ designation. (Individual, No Address - #A834.25000)

### **1312. Public Concern: The Forest Service should manage roadless areas under a specific roadless management designation.**

DO NOT designate further wilderness. Should be maintained under a specific designation for roadless area management under the forest plan. (Individual, Brimley, MI - #A3659.25240)

I favor a new type of designation if protection is needed from resource extraction—call it a “wild lands protection area” or name of your own choosing. In such a designated area, all forms of recreation are permitted but not resource extraction. The only logging permitted is to maintain forest health. (Individual, Palmer Lake, CO - #A23361.25300)

#### **TO RESOLVE ONGOING WILDERNESS CONTROVERSIES**

Anytime you involve Congress you get into political posturing, egomaniacs, vote trading, power trips and high-paid lobbyists who do not represent the public. Wilderness designation does not protect an area from development. It also can be undesignated by a less environmentally friendly Congress or president (like Mr. Bush). It is best to leave the designation locked in for as long as possible under the forest plan. (Individual, Anchorage, AK - #A5342.25000)

ARRA prefers that any areas identified for future roadless protection should be maintained as a specific designation through the local management plan for each National Forest. Wilderness designation debates in Congress are often controversial and once designated, it is very difficult to revisit an issue. Keeping the designation within the management plan for each forest allows more rapid resolution while at the same time allowing for further refinement in future years. (Organization, Washington, DC - #A5069.25340)

Assuming that we ever return to a 10-year planning process, areas remaining roadless under the designated uses of a forest plan will be just that: roadless. Just like elk habitat will be elk habitat. Why treat the two differently?. If the purpose is to “preserve the Wilderness option” (which is unfortunately often an unspoken but key issue in this debate) then we again create for ourselves a half-pregnancy that does nothing to help solve the legal swamp we’re in.

The rules, quasi-rules and pseudo-rules that have invaded our national forest management system have all the attributes of the dense, spindly thickets that many of those forests have become. The same approach to clearing up both is called for, namely, the active implementation if established, firmly grounded, and clearly articulated legal and scientific principles, leading to a far higher degree of certainty in the roles that Forest Service professionals are called upon to play. (Individual, Spokane, WA - #A17819.25100)

#### **TO RESOLVE PROBLEMS OF COMPETING INTERESTS**

With regard to competing values, an effective way for the Forest Service to manage lands for users with competing views is to provide different designations of land. Most of the conflict arises over an attempt to make public land everything for everybody. The roadless initiative represents an excellent solution to this problem. It basically says that we will take this portion of Federal land and manage it in a manner consistent with the resource values that this land provides. Land that already has roads, developed campgrounds, or active logging will obviously be managed in a different manner. Designating land to serve specific management goals rather than trying to manage all land for all uses is the only way to serve all user groups effectively. (Individual, Seattle, WA - #A17843.15160)

### **1313. Public Concern: The Forest Service should manage roadless areas under a specific roadless management designation.**

#### **WHICH WOULD ALLOW MECHANIZED RECREATIONAL ACTIVITIES NOT PERMISSIBLE IN WILDERNESS AREAS**

Although mountain bikers agree that some protections should be afforded these special Roadless Areas, and certainly our trail experiences are enhanced by single track trails, wildlife and forest qualities of the

areas, we are fully aware that wilderness designation would BAN us from riding on these trails. This would be unacceptable to the mountain bike community. Our impacts are no more than an equestrian's or a hiker's. A pack train of several horses or dozens of hikers on a poorly designed or un-maintained trail can cause severe damage and any erosion problems can detract from the natural resources. The mountain bike community has made huge efforts in learning trail design, in maintaining existing popular trails, and in sharing trails in a socially acceptable manner. Wilderness designation shuts the door on these interested, knowledgeable trail users who've been collaborating successfully for years with the local forest staff. A different designation, which would afford certain protections for these roadless areas, short of designating them wilderness, would be a win-win situation for the forest and for a large recreational community. (Organization, Boulder, CO - #A17252.25240)

Some areas should be designated wilderness areas. However, a designation of roadless that could allow mechanized but not motorized recreation depending on the environmental concerns of the area might be plenty of protection. And again, maybe some roadless areas should be closed to all recreation. (Individual, Silverthorne, CO - #A28101.25310)

**8. Designating Areas.** I think that Inventoried Roadless Areas should be managed separate from wilderness and therefore should be granted their own land designation—less protective than wilderness (in that bikes should be allowed), but more protective than non-roadless national forest land. (Individual, Dallas, TX - #A17005.25300)

#### **WHICH WOULD ALLOW SOME ADMINISTRATIVE ACTIVITIES NOT PERMISSIBLE IN WILDERNESS AREAS**

While roadless areas may have many of the same qualities as wilderness, they are not identical. For instance, an area may be roadless but still allow access by planes or helicopters for management purposes consistent with the area, such as a prescribed burn, removal of invasive species, or studies of radio-collared wildlife. Therefore, roadless areas need to be considered as a designation separate from wilderness and one that is entirely within the authority and mission of the Forest Service. (Organization, Anchorage, AK - #A17358.25000)

I do not believe that all roadless areas need to be managed as official big “W” wilderness areas. I believe there is room for some areas to be managed in some sort of special roadless management designation. Such rules might allow for the use of some motorized equipment within roadless areas. For example, I would not be completely opposed to the use of chainsaws for trail maintenance or other administrative purposes as long as the “roadless” character is maintained. I believe, the final rule allows some options that would not be permissible in an officially designated wilderness area. (Individual, Moscow, ID - #A4871.25000)

In general roadless areas should be managed as de-facto wilderness, including prohibition of mechanized access except for narrowly drawn exceptions for the legitimate direct use of the managing agency. For example, use of chain saws or mechanical “toters” for trail maintenance purposes could be permitted. (Individual, Seattle, WA - #A17261.25200)

I prefer the idea of Wilderness areas that have roadless areas around them. Thinning can occur in the roadless areas . . . some roadless areas are critical wildlife corridors between wilderness areas. We need both types of areas with different management, but that remain roadless and non-motorized, except maybe helicopter logging or those new tree cutting/removal machines that don't need roads but can cut and remove weak trees. Can't use those in the wilderness. (Individual, Silverthorne, CO - #A28101.25310)

**8. DESIGNATING AREAS.** Roadless areas by and large are key watersheds, which provide snowpack retention and habitat and protect water quality. Nevertheless, to designate these areas as wilderness would foreclose critical management activities that may be needed to protect the most important roles

key watersheds serve. If specific designation of a roadless area is appropriate, it should be made under the local forest plan. (Elected Official, Union County, OR - #A8707.25230)

#### **WHICH WOULD SERVE AS A NON-MOTORIZED TRANSITION ZONE BETWEEN WILDERNESS AND ROADED AREAS**

I hope that one option for the roadless areas is to transition to a wilderness condition, where motorized vehicles are prohibited and strict limits are made on the kind and amount of access. I would like to see these areas protected on a permanent basis. There is little enough left. (Individual, Olympia, WA - #A9083.25200)

#### **WHICH WOULD SERVE AS A MOTORIZED TRANSITION ZONE BETWEEN WILDERNESS AND ROADED AREAS**

IRAs should be managed to offer opportunities and values between wilderness and “managed” (roaded) N.F. lands. The relatively natural forest setting envisioned in the RACR provides for a wide range of recreational opportunities including camping, hiking, hunting, fishing, motorized use, adventure exploration, etc. as well as amenity values such as clean water, undisturbed wildlife habitat, research, appreciation of natural vistas, etc. Commercial uses such as special forest products, outfitting/guiding, range allocation, timber harvest and salvage are also appropriate to the extent that they don’t require roading and/or significantly alter the general forest setting toward the “managed” or “matrix” end of the spectrum. (Individual, Lyons, OR - #A13491.45100)

### **1314. Public Concern: The Forest Service should create a dynamic roadless designation.**

If ecosystem management is not politically passe yet, let’s apply it to this situation. In a landscape that is intensively managed for timber extraction (as many National Forests are), roadless areas are most often ecologically unique in that they are in a late seral successional stage (e.g. “old growth”). But note the term “successional,” implying an inherently dynamic system. In forest ecosystems fire, disease, windstorms, and logging are the main processes which reset the successional clock. So if maintaining late seral islands and corridors within our forests is the ultimate goal, then declaring a certain area roadless only eliminates the human-induced disturbance. And the sense of “permanent protection” such a legal designation implies is at odds with the reality of a dynamic system. One of the other “natural” factors is likely to reset the successional clock. This probability will only be exacerbated in a global warming scenario. A static roadless designation doesn’t go far enough toward maintaining a stable percentage of late seral ecosystems. I propose a “dynamic designation.” I know this would be an implementation nightmare, especially for a federal agency, but it has a lot of merits for all “stakeholders” concerned. . . . (Individual, McCall, ID - #A25834.50100)

So these are some general thoughts on how a dynamic roadless designation could work. There are a lot more details I’ve considered, but don’t want to elaborate on here. There are doubtless many more angles I haven’t even thought of. I know that you, dear NEPA reader, have to summarize and pigeonhole this entire letter, so if nothing else, just capture the key concept of “dynamic designation.” Now I know that thinking outside the proverbial box is not the Forest Service’s forte, so if this just sounds like too wild an idea, then just put me on record as supporting the implementation of the RCA rule as it stands. (Individual, McCall, ID - #A25834.25000)

#### **REQUIRE DIFFERENT LEVELS OF NATIONAL ENVIRONMENTAL POLICY ACT ANALYSIS BASED ON THE TYPE OF ENTRY PROPOSED**

The level of NEPA required should be directly related to the level of access proposed to the newly opened area. Once again using a post-fire salvage logging example, if it were helicopter logged, then do a Categorical Exclusion, land based harvest using temporary roads which were then obliterated would require an Environmental Assessment, and a case where new system roads were constructed and left open would need an Environmental Impact Statement. What about a case where disease is the agent of ecological reset? That’s a little touchier, because of the potential for abuse. I’ve seen foresters look at a stand, see a few bug-infested trees, declare the trees “imminently dead,” and then draw up a clearcut unit for the entire stand in order to “stop the bugs.” Sort of reminds me of burning villages in Vietnam to

“save them.” I don’t think entry should be allowed unless there is a significant contiguous portion (say 15%?) of the area with 100% mortality. (Individual, McCall, ID - #A25834.25000)

#### **ALLOW BOUNDARY MODIFICATIONS**

A “dynamic designation” would allow for future additions and subtractions of land from a given roadless area. Perhaps an example is in order here. Say part of a roadless area burned. Remove that portion from roadless designation and allow salvage logging of any merchantable timber (adhering to all the relevant resource protection and BAER practices). Then add an equivalent adjacent area to the remaining roadless block. Selection of what area to add should be that which is in the best condition. Criteria for additions. The chosen area should be that which is in the best condition. Criteria for selection would have to be defined (preferably in advance), and besides successional stage might include biodiversity, connectivity to other roadless areas, habitat quality (particularly for ESA species), lack of tree disease, watershed integrity, etc. A simple case would be the choice of a patch of 50-year-old second growth mixed-conifer over a diseased stand of lodgepole pine. Obviously a decision matrix would include a variety of relevant factors, but in many cases I suspect the choice would be fairly obvious. (Individual, McCall, ID - #A25834.25000)

### **1315. Public Concern: The Forest Service should create multiple roadless prescriptions that can be applied based on site-specific conditions.**

During the plan revision/amendment process, roadless areas should be evaluated for a number of different management allocations that preclude roadbuilding and timber management. During the process, and with the participation of the public, a variety of prescriptions should be developed to address a variety of management options reflecting the values associated with the roadless areas. Among the values that should be addressed . . . in the prescriptions are:

Values important for science and scientific research.

Watershed integrity values to support aquatic diversity and critical refuge habitat for aquatic and riparian associated species.

Public water supply values.

Backcountry, non-motorized recreation.

Habitat for wide-ranging species that prefer mature unfragmented forest conditions.

Scenic integrity values.

Habitat for rare communities and threatened, endangered, sensitive and locally rare species.

Cultural, historical and “sense of place” values.

Biological diversity values.

“Old Growth” restoration. (Organization, Damascus, VA - #A17723.25310)

### **1316. Public Concern: The Forest Service should allow local forest plans to add additional prohibitions to roadless management prescriptions.**

Inventoried roadless areas that are not recommended for Wilderness should be allocated to prescriptions in the Forest Plan that maintain the roadless characteristics of the area in a manner consistent with the Roadless Area Conservation Rule, but that emphasize the special or unique characteristics of the area. While remaining consistent with the Roadless Area Conservation Rule direction, a prescription may be applied to a specific area or parts of an inventoried roadless area that recognizes specific additional prohibitions or mandates additional required management activities for that area. We have also noted that some of the allowed exemptions for road construction or timber harvesting may be identified as appropriate for some roadless areas and the area is allocated to an appropriate prescription. We would expect a variety of management emphases for various roadless areas. Thus, we believe it would be inappropriate to specify only one designation for the management of roadless areas that are not allocated to Wilderness recommendations. (Individual, Asheville, NC - #A22623.25300)

**1317. Public Concern: The Forest Service should allow local forest plans to allocate roadless areas to prescriptions that do not contain the exemptions in the national rule.**

We believe the FS should begin by defining the types and locations of roadless areas for which exceptions to the prohibitions should not be considered. This would provide an important improvement to the Rule by placing the most socially and ecologically important portions of the inventoried areas off limits to road building and timber harvesting. Through the rule-making process, the FS should establish categories of roadless areas for which exceptions should not be granted, and then document and map those areas in the course of subsequent forest plan revisions. These would include areas with scarce social and ecological values such as; a source of drinking water, reference areas for research; areas of high or unique biological diversity and old growth forests; areas that provide a bulwark against invasive, noxious, or exotic pest of weed species, areas where other roadless lands are scarce; areas that provide important historic or potential sources of dispersed recreation; areas of cultural or historic importance; and all areas that provide unique or important seasonal habitat for wildlife, fish, and plant species. For all other inventoried areas, the FS should maintain the Rule's prohibitions on road construction and resource extraction, and also maintain categories of exceptions designed to meet legitimate concerns put forward by stakeholders. As discussed above, the design and implementation of these controlled exceptions should provide the primary focal point for input by citizens living near the roadless areas. (Organization, Washington, DC - #A21762.25310)

**1318. Public Concern: The Forest Service should only use roadless as a temporary designation.**

A specific category labeled 'inventoried roadless' should only be a temporary label applied until designation as wilderness or for multiple use is made. Once made, these decisions should not be open for continual reevaluation. (Governor, State of Montana - #A17660.25000)

If this "roadless" scheme is implemented, there needs to be an "effective" mechanism to reclassify the area from "roadless" to allow usage of this land in the future. Without this mechanism the roadless designation is essentially a "closed" designation. (Individual, Tustin, CA - #A20777.25000)

*Do Not Designate Roadless Areas*

**1319. Public Concern: The Forest Service should not create a specific roadless area designation.**

Roadless areas should be managed no differently than any other area of the forest that is not designated as WSA or Wilderness. There is absolutely no reason to make the FS manage roadless areas as de facto wilderness or any other special designation. All activities that are permitted within the forest should be allowed within roadless areas to the extent that current forest management plans allow. (Individual, Anaheim, CA - #A953.25000)

Roadless areas as a management category should not be the discussion. Extremists have seen fit to take this specific word and try to establish it as a valid management category.

In fact, this eight letter word is and has been a word to differentiate public lands that were/are either Wilderness, potential Wilderness, or "Multiple Use Lands" (no roads).

This "wordsmithing" attempts to change public policies and laws outside of the legal process. (Association, Cody, WY - #A41559.25300)

**BECAUSE CONDITIONS AND SITUATIONS VARY**

There should definitely not be a separate Roadless designation. Conditions and situations vary too much for such a designation to be needed or workable. (Individual, Payette, ID - #A1049.25240)

**BECAUSE THE PRESENCE OR ABSENCE OF ROADS IS NOT SUFFICIENT JUSTIFICATION**

The Forest Plan should make the decision whether or not any area should be recommended to Congress for formal Wilderness designation, recognizing that the Wilderness Act defines clearly those attributes that must be present for such a designation. For other areas that do not meet these criteria, there is a full range of land use categories already in existence to use for land allocations. Forest Plan revisions should use recognized land use categories that allow for a locally specific complement of the land management activities. While we fully support Wilderness designation, we do not support a national land use allocation category for "roadless" because we do not agree that the simple presence or absence of a road constitutes an appropriate land allocation category. In the event the Forest Service pursues such a policy, even on an interim basis, the roaded portions of inventoried roadless areas should be deleted from the designation. (Association, Terra Bella, CA - #A15588.25320)

**BECAUSE IT WILL STRAIN FOREST BUDGETS**

There is no reason that has been identified to develop a new category of National Forest land management such as roadless. As the Forest Service should have already discovered with other special designations, such as the White Clouds and Hells Canyon National Recreation Areas, Congress is not impressed and usually does not fund these increased special agency emphasis areas because extra budget money is not really available. The money for their management is siphoned off of other legitimate programs. Simply keep the program in the Forest Plan's designation unless the unique roadless area has unusual support that would require congressional support through a special designation. (Individual, Cambridge, ID - #A11714.25220)

**BECAUSE IT IS AN UNNECESSARY LAYER OF REGULATION**

At present, Forest Plans must (1) evaluate whether roadless areas meet wilderness criteria and (2) make recommendations to Congress for wilderness designation. Forest plans may also designate roadless areas for continued roadless management, regardless of wilderness recommendations. It therefore appears that the January 12 Rule imposes an additional and unnecessary layer of regulation upon roadless areas. Implementing both roadless area rule making and Forest Plan revision provides no clear benefit; rather the combined approach appears to cause significant redundancy and wasted resources. (Elected Official, Eureka County, NV - #A20741.25110)

Establishing a management category of ROADLESS unnecessarily complicates and compromises the management of public lands. There ALREADY is a sound legal process to bring roadless areas up for Wilderness inclusion by Congress. The general public is sadly unaware of this, and is being misled down the path of public policy panic. The United States Forest Service should be playing a major role in educating the public about existing legal mechanisms. It should not continue to allow itself to be "used" to this end. (Association, Cody, WY - #A41559.25300)

Regulations should not be used to allocate the roadless units. Rather, they should be short and simple, providing general guidance to forest planners. We would question that special regulations for roadless areas are actually necessary. The guidance might better be provided in manual or handbook form. (Individual, Frenchtown, MT - #A11887.25000)

**1320. Public Concern: The Forest Service should not designate additional roadless areas.****BECAUSE IT WOULD NEGATIVELY IMPACT RECREATIONAL ACCESS**

Protecting access. The forests belong to ALL Americans and appropriate access should be available for everyone, including access roads, trails and waterways. The current policy of land trades is acceptable if it is balanced for all parties. However, adding additional roadless areas is not appropriate any longer, population and demand for recreational access is high. WE SHOULD NOT SEEK ADDITIONAL ROADLESS STATUS. (Individual, Aurora, CO - #A538.25000)

### UNTIL IT LEARNS TO MANAGE EXISTING WILDERNESS AREAS

We have already established wilderness areas and I see no need for additional roadless areas. Let us learn to manage our existing wilderness areas before we create more, hard to manage wilderness areas.

Advantages of NOT having roadless areas:

1. Minimize the possibility of catastrophic wildfires.
2. Minimize the amount of time it takes to respond to a lightening strike and, or, wildfire.
3. Minimize insect infestation of National Forests and monitor wildlife habitat.
4. Increase the area that the general public can travel to enjoy our National Forests.
5. Communities and private properties adjacent to Federal lands would be at less risk of damage or destruction due to wildfires. (Individual, Kamiah, ID - #A5419.30100)

### 1321. Public Concern: The Forest Service should not use inadequate road maintenance funding as an excuse for declaring an area roadless.

The Forest Service should . . . avoid the temptation of trying to solve administrative problems through planning expedencies. For example, issues such as the inability of the Forest Service to maintain roads within an area should not be used as justification for declaring an area roadless. Financial capability is a matter of the congressional budgeting and appropriations process, not a land-use matter. We recognize the situation is complex, but believe shortcuts create more problems than they solve. (Association, Spokane, WA - #A17351.17240)

## Roadless Area Designation Criteria

### 1322. Public Concern: The Forest Service should develop objective evaluation criteria for local roadless area planning and management.

There must be regulations that aid Forest Supervisors and the plan revision teams that provide a consistent procedural approach to Roadless Area management.

The procedural regulations must give objective criteria upon which to determine, during "Analysis of the Roadless Situation": (a) which areas will be subject to Roadless Area evaluation, consistent with the parameters of roadless evaluations established in the 1964 Wilderness Act; (b) the values that must be considered in evaluating Inventoried Roadless Areas, including but not limited to (i) the developed nature of the area, (ii) the existence of roads, whether classified or unclassified, (iii) the existence of trails, whether motorized, mechanized, equestrian, or pedestrian, (iv) the existence of listed Threatened or Endangered species, (v) the remoteness of the area under evaluation (i.e. is it located under large cities, how many miles is it from the nearest metropolitan area with a population larger than 30,000); (vi) water quality, wildlife habitat, and air quality, then utilize this information to consider what management decisions are necessary to improve or maintain desired levels for these conditions recognizing that dispersed recreation, whether motorized or non-motorized does not necessarily cause negative impacts to these values; (c) what recommendation the agency made in prior evaluations as to the "sustainability" or "non-suitability" of the area for Wilderness designation, and the disposition of such designation (has Congress acted upon the recommendations); (d) whether there are any factors, and what those factors are, which would chance the agency's prior recommendations. If no contribution factors exist, the area should not be reevaluated through current planning to avoid for the nation's lumber needs; (f) the need for pedestrian recreation (how much of a need is there vs. how much of an opportunity already exists . . . ; (g) the need for motorized and mechanized recreation (how much of a need is there vs. how much of an opportunity already exists . . . ; (h) the current and historic use of the area (is the area used for canoeing, hiking, camping, cross-country skiing, OHV use, etc.); (i) the economic impact upon local economies should any alternative management decision be implemented; (j) objective criteria for measuring each consideration (are there cities or towns within 5 miles, 10 miles, 15 miles, 100 miles, etc.); (k) the likelihood of catastrophic wildfires, disease, or insect infestation (overlay map of roadless areas and their fire potential assessed by the integrity fire team); (l) whether proposed project are compatible with the values and considerations listed above. (Organization, Chesapeake, VA - #A11804.25100)

There is no hard-fast rule for evaluating protection and management of inventoried roadless areas (IRA). A number of factors must be considered when managing IRAs, among those:

Consider the current state of the IRA, not the desired state.

Consider local needs over non-local needs—locals usually know (the land) better.

Consider fire/pests/non-indigenous species and their management.

Consider displaced recreation—when recreation is displaced it adds congestion, effects elsewhere.

Consider proximity to urban areas—urban populations need a place to get away from it all—there will be adverse affects to our overall environment and economy if people must drive large distances to recreate in a manner of their choosing.

Consider accurate science that pertains directly to issues at hand. A number of studies I've seen attempt to relate outcome from one study to a totally different set of circumstances. Good, high-quality, relevant science is needed.

Finally, a local process planning forum/process is needed to consider all of the above. (Individual, Palmer Lake, CO - #A23361.45100)

### **1323. Public Concern: The Forest Service should clarify the criteria for identification of roadless areas in the Forest Service Handbook to ensure consistency.**

#### **FOR ROADLESS AREAS IN THE EAST**

As part of the Southern Appalachian Assessment, a revised roadless inventory was conducted for the Jefferson, Chattahoochee/Oconee, Alabama, Sumter, and Cherokee National Forests. There were significant differences among those Forests in how they applied the criteria found in Chapter 7 of the Forest Service Handbook that outline the procedures for conducting a roadless inventory. Based on this experience, we believe it is important to clarify the criteria for identification of roadless areas in the Forest Service Handbook to assure consistency in its application on all Forests. Among the aspects that require clarification for roadless criteria in the East are the following:

- i. Substitute the term “classified” for “improved” in the procedures for calculating the allowable road density in an area. Similarly, substitute the term “unclassified” for “unimproved”. Adopted the definition of “classified” and “unclassified” used in the road policy.
- ii. Definition of “Solitude” should not require cores of ROS categories of Semi primitive Non Motorized or Semi primitive Motorized lands, as was done in the SAA roadless inventory.
- iii. Definition of “Solitude” should not require absence of “sights and sounds” from surrounding areas throughout the roadless area, especially not east of the 100th meridian.
- iv. The standard should remain that road density is determined by dividing total acreage by mileage of classified road. The methodology for defining areas eligible for the roadless inventory should yield consistent results whether done by GIS means or manual means. We believe it is important to add direction to the FS Handbook for GIS delineation of roadless areas to assure consistent results are achieved. It is important that GIS analyses be used so that exact areas can be designated and mapped. It is important that final acres for roadless areas be reported only after the GIS analyses are completed. This will reduce the apparent conflict and ill feelings generated by the current procedures.
- v. The Handbook should clarify that “unclassified” roads do not count toward the limit of 1/2 mile of road per 1,000 acres. Old railroad or road grades that have been abandoned and are no longer in use should not be included as “classified” roads.
- vi. There should be clarification about what existing mileage of “unclassified” roads can be allowed within a roadless area. We suggest that there be no limitation on the existence of “unclassified” roads in defining allowable road mileage with a roadless area.
- vii. We believe there should be greater emphasis on creating quantifiable evaluation criteria for roadless areas for consideration of these areas as Wilderness recommendations.

viii. The Handbook should clarify that the existence of privately held mineral rights or outstanding leases for areas should not be a factor in determining eligibility for the roadless inventory. These may be relevant factors in the evaluation regarding Wilderness recommendations.

ix. In general, boundaries of roadless areas should be set back a minimum distance from existing roads rather than using ridges or other topographical features. We suggest using the setback distance that has been used in a plurality of designated Wilderness areas. It may be appropriate to have different standards east and west of the 100th meridian. (Civic Group, Roanoke, VA - #A1713.45000)

### **1324. Public Concern: The Forest Service should amend the Forest Service Handbook.**

#### **TO REFLECT THE CHANGE IN PURPOSE FOR IDENTIFYING ROADLESS AREAS**

The process and criteria for identifying roadless areas are contained in the Forest Service Handbook. Among the characteristics identified there are size, configuration, adjacency to existing Wilderness Areas, solitude, and road density. We think these 5 characteristics are appropriate for evaluating whether or not a unit of land should be included in the inventory. With regard to these characteristics, however, we think the handbook should be amended to reflect the change in purpose for identifying roadless areas. The Handbook criteria presuppose these areas need to attain minimum qualities for Wilderness designation. We think the Roadless Rule has different objectives. To address the objectives of the Roadless Rule, we think the following changes are needed:

The solitude characteristics should have nothing to do with the size of SPNM or SPM core area, nor should “sights and sounds” be considered a factor.

The term and definitions of “improved and “unimproved roads” should be changed to “classified” and “unclassified.” Road density should be calculated based on miles of classified roads per 1000 acres. (Organization, Damascus, VA - #A17723.45100)

### **1325. Public Concern: The Forest Service should provide up-to-date, consistent criteria for the delineation and use of roadless areas.**

If a national policy regarding roadless areas is to be enacted, it should provide timely, consistent criteria for the delineation and use of these lands. (Association, Sacramento, CA - #A3681.75000)

In evaluating the Roadless designation, there needs to be a well-defined criteria. Included are unique geological/topographic character, proximity to appreciative users, the damage from past intrusion by human activities, regional watershed protection and (the difficult to define) special aesthetic qualities. (Individual, No Address - #A23613.45000)

The Forest Service must first define up-to-date criteria incorporating backcountry values in identifying roadless areas. I participated in that process, and had some concerns about the proposed revisions, which I felt were too Wilderness oriented. Those draft policies were never finalized. Nevertheless, the draft version was used to reinventory the roadless areas in the Wasatch Cache and Uinta National Forests.

These draft roadless criteria should be finalized to incorporate backcountry values. They should consistently apply on all forests as reinventories are done as a part of local forest planning. (Organization, Idaho Falls, ID - #A20543.45100)

#### **WITH ALL MAPPING BEING GROUND VALIDATED**

The first step is for the Forest Service to provide national direction on the criteria for delineation of roadless areas. This criteria should include standards for mapping classified and unclassified roads, mapping of forest health, fire and insect/disease risks, wildlife habitat, water quality, scenic values, access needs, recreational opportunities, timber values, wilderness attributes, etc. Using the above information, national forest should be remapped to accurately reflect their roadless areas with all mapping being ground validated. (Business, Colville, WA - #A3362.45000)

**WITH THE DELETION OF ROADED PORTIONS OF INVENTORIED ROADLESS AREAS**

The Forest Service must first provide up-to-date criteria for the delineation of roadless areas. The criteria should be consistently applied on all forests and should include such factors as forest health, wildlife habitat, water quality, scenic values, access to non-federal land, and variety of recreational opportunities. Roadless portions of inventoried roadless areas should be deleted from the inventory. (Elected Official, Boise County, ID - #A4889.45000)

**1326. Public Concern: The Forest Service should develop criteria for identification of unroaded areas outside of inventoried roadless areas.**

One of Idaho's major concerns is the so-called "procedural rule," which was removed from the RACR and included in the Final Planning Rules. The Rule requires local managers to identify "unroaded" areas lying outside IRAs and determine whether it is appropriate to restrict road construction and other activities on such lands so that they will remain essentially roadless.

The Rule, however, made no effort to identify unroaded areas or provide criteria and parameters for the identification of such areas during the planning process. Without such parameters, it will be very time consuming and costly for local managers to identify and examine such areas during the planning process. Indeed, requiring examination of unroaded areas without parameters for their identification poses a serious threat to the timely completion of forest plan revisions. Forest planning may well get bogged down by arguments and lawsuits over the exact scope of the lands that must be examined to fulfill the requirements of the rule. (Governor, State of Idaho - #A20141.13000)

**1327. Public Concern: The Forest Service should develop criteria in the Forest Service Handbook for identifying areas to be excluded from the Roadless Area Conservation Rule.****DUE TO PRIOR DEVELOPMENT ACTIVITIES**

The current roadless area conservation rule exempts areas from the rule that have been developed since the last roadless inventory, generally RARE II. It states that timber harvesting may occur in portions of roadless areas that have been developed. Specifically, it states: (4) Roadless characteristics have been substantially altered in a portion of an inventoried roadless area due to the construction of a classified road and subsequent timber harvest. Both the road construction and subsequent timber harvest must have occurred after the area was designated an inventoried roadless area. Timber may be cut, sold, or removed only in the substantially altered portion of the inventoried roadless area.

This direction leaves unclear exactly where the developed portions are located and available for additional timber harvesting (provided the prescription for the area allows such activities). When the reexamination of areas eligible for roadless status is conducted during revision of the Forest plan, this uncertainty is removed because boundaries of roadless areas are clearly delineated, and the areas to which the roadless conservation rule applies is delineated.

However, until the delineation of roadless areas is conducted as part of the revision of a Forest Plan, additional criteria should be developed in the Forest Service Handbook. These should provide more specific guidance to the Forest managers about areas that should be excluded from application of the rule due to prior development activities. (Individual, Asheville, NC - #A22623.45500)

**1328. Public Concern: The Forest Service should designate areas as roadless based on inventory status.****ALL AREAS IDENTIFIED IN PAST AND PRESENT INVENTORIES**

Don't limit immediate, permanent protection to RARE II or forest plan inventoried roadless areas; include areas identified in all existing inventory data. (Individual, Corvallis, OR - #A11653.45620)

**AREAS IDENTIFIED IN ALL FOREST ASSESSMENTS FOR WHICH INVENTORY DATA EXISTS**

The Rule should not limit immediate, permanent protection to Roadless Area Review and Evaluation II or forest plan inventoried roadless areas only, but should also include areas identified in other forest assessments for which inventory data exist. (Individual, Arvada, CO - #A17160.45400)

**AREAS CLEARED THROUGH THE NATIONAL ENVIRONMENTAL POLICY ACT PROCESS AT THE TIME OF THE ROADLESS INVENTORY AND WHICH REMAIN ROADLESS**

**Areas with NEPA cleared units at the time of the roadless inventory which remain roadless should be given full protection under the roadless policy:**

There are locations in the Tongass, such as Ushk Bay/Poison cove, and the head of Crab Bay, both on Chichagof Island, which were given a special status in the roadless inventory due to an assumption they would become roaded, since they contained NEPA cleared units. This assumption was unwarranted and these areas should be treated equally with all other areas qualified in the roadless inventory. The NEPA unit areas were left out of the maps published in the roadless FEIS. Analysts used the wrong coding rule to select roadless areas. If this situation has a parallel in other national forests, those existing roadless areas should be protected as well.

The roadless database (rdls95, an ArcInfo cover) used by the Tongass Land Management Planning Team includes the following items:

Area perimeter, rdls95\_, rdls95\_id, rdls\_area, acres, category, category2, and type. Area provides the area in square feet of the polygons in the dataset, and perimeter the perimeter. Rdles96 and rdls95\_id number the polygons. Type describes whether the polygon is land or freshwater. Acres contains the acreage for all polygons within the dataset.

The items that provide important information relative to the purpose of the dataset are rdls\_area, category, and category2.

**Item Description Code Code from TLMP data dictionary**

Category2	Roadless-Area	Code L	Roadless Area
		M	Monument Area
		N	NEPA Unit Area
		P	Non-National Forest
		R	Roaded Area
		S	Smaller than 5000 Acres polygon
		SW	Saltwater Polygon
		T	LUD II Polygon
		W	Wilderness

**Item Description Code Code from TLMP data dictionary**

	Roadless Area		
Rdls_Area	Unique Feature I	200-299	Stikine Roadless polygon
		300-399	Chatham Roadless polygon
		500-599	Ketchikan Road-less Polygon
		888	Wilderness

The category item has similar distinctions to category2, including roadless, roaded, and NEPA Unit area.

The rdls-area item has polygons coded as zero, or from 1-577. The zero group includes areas containing NEPA cleared units, wilderness, national monuments, non-National Forest lands, and National Forest roaded areas. Therefore the zero group is not a good discriminator of the presence of roads. The numbered group reflects the code given to individual unroaded areas greater than 5000 acres. The size of the number reflects the management location of the roadless area, within the Stikine, Chatham, or Ketchikan management areas. Areas with NEPA cleared units were not given an individual number, perhaps due to the expectation they would eventually become roaded, nor were roadless areas less than 5000 acres (except for Kadin, Kasherverof, and Fake Pass). However, they remained part of the roadless

inventory and were identified by special codes in the category2 item. Simply because an area had not yet been assigned a unique feature identifier does not disqualify it from status as a suitable roadless area.

The definition of a roadless area is “undeveloped areas typically exceeding 5,000 acres that were inventoried during the agency’s formal Roadless Area and Evaluation (RARE II) process, and remain in a roadless condition through forest planning decisions.” Areas with NEPA cleared units were inventoried during the Rare II process, given a special code, and that remain roadless fit the definition of roadless area and should be treated equally.

It is likely that the maps produced for the FEIS were made by using the rdls-area attribute and eliminating areas coded as zero. However, this was a simplistic method that did not take advantage of all information contained in the dataset, and was therefore poor analysis procedure. The conscious decision to exclude these areas with special status in the roadless inventory due to the assumption they would become roaded was unwarranted, since in fact they did not all become roaded. The proper query would have been to select for all category2 codes L or N, where N remains unroaded, or to portray them as roadless areas with NEPA cleared units. Therefore, the maps are in error due to the omission of these areas from portrayal as roadless areas, and corrected maps should be generated. (Individual, Sitka, AK - #A15506.45623)

#### **AREAS OF DE FACTO ROADLESS LAND ADJACENT TO THE INVENTORIED AREAS**

A primary concern I have is that the inventoried roadless areas leave out large areas of de facto roadless land adjacent to the inventoried areas. (Individual, Painted Post, NY - #A357.45331)

#### **UNINVENTORIED ROADLESS AREAS**

The proposed rule should also include provisions governing the designation, management and protection of uninventoried unroaded areas. The process by which the existing roadless areas were designated wanes conservative and many areas that do not currently contain roads lie outside their boundaries. Adequate management and protection of inventoried areas should not preclude the protection of uninventoried roadless areas. (Organization, Boston, MA - #A23083.45420)

In implementing the Conservation Rule, we ask you to consider that the Forest Service obviously could not have had the personnel to inventory all roadless areas. As a result, there are large areas that are still uninventoried. As we have noted before, it should not be difficult to avoid building roads in uninventoried areas since naturally there is some requirement of knowledge of an area before road construction could intelligently be authorized. Consequently, we strongly urge that the Conservation Rule apply to all roadless areas, whether inventoried or not. They all furnish the same benefits referred to above and, thus, it is just as cost-effective to protect uninventoried as well as inventoried roadless areas. (Organization, Birmingham, AL - #A21582.45420)

### **1329. Public Concern: The Forest Service should designate areas as roadless based on scarcity on a forest-by-forest basis.**

Scarcity. If a Forest has only a few roadless areas, they probably should keep what they have. In contrast, if a Forest has over 50% IRAs, then they have options to develop some of them if they’re suitable.

I recommend that a Forest be required (through a National policy) to provide for, at least, the average acreage currently existing on a State-wide (FS), Region-wide (FS), or National (FS) basis, whichever is lowest, unless there’s a strong reason not to. (The Chief should be required to concur in these situations. For example: an IRA is located in the path of a critically needed electric power transmission corridor.) A policy like this would ensure a minimum acreage of roadless values for future generations. (Individual, Libby, MT - #A2301.25000)

### **1330. Public Concern: The Forest Service should designate areas as roadless based on ecological characteristics.**

#### **SMALLER ROADLESS AREAS OF ECOLOGICAL IMPORTANCE**

Proximity to other such areas — a roadless area of seemingly small scale may be ecologically extremely important if the distance to adjacent similar areas is biologically significant, allowing gene flow or movement of animal populations or individuals between. (Individual, Astoria, OR - #A476.50100)

An area (such as a watershed) should be recognized as roadless if is such, even though it falls below some acreage threshold. View it on a watershed level as well as an acreage level. This could result in some really neat small local areas being preserved. (Individual, Sandia Park, NM - #A26171.45330)

Please keep in mind that studies of forest ecology have shown that it takes a MINIMUM of a patch of forest NO LESS THAN 5 MILES ON A SIDE to preserve the moisture levels and wildlife status within a “virgin” forest area. (Individual, Fairfax, VA - #A26362.45330)

While protecting inventoried roadless areas will contribute to overall conservation objectives, scientists believe that roadless areas smaller than the arbitrary 5,000-acre criteria are biologically significant and should also be considered as part of your forthcoming roadless area rule. In December, 1998 170 scientists signed a letter to the Forest Service urging the agency to protect all biologically significant area. The scientists’ letter said:

There is growing consensus among academic and agency scientists that existing roadless areas—irrespective of size—contribute substantially to maintain biodiversity and ecological integrity on the National Forests. The Eastside Forests Scientific Societies Panel, including representatives from the American Fisheries Society, American Ornithologists’ Union, Ecological Society of America, Society for Conservation Biology, and the Wildlife Society, recommended a prohibition on the construction of new roads and logging within excising (1) roadless regions larger than 1,000 acres, and (2) roadless regions smaller than 1,000 acres that are biologically significant (Henjum et. al. 1994). In our view, a scientifically-based policy for roadless areas on public lands should, at a minimum, protect from development all roadless areas larger than 1,000 acres and those smaller areas that have special ecological significance because of their contributions to regional landscapes.

FOREST GUARDIANS strongly believes the final rule must incorporate the best available scientific information. With that in mind, we urge the Service to implement a policy that includes all biologically important roadless areas within the National Forest System. There is no scientific justification for the exemption of these lands from roadless area protection. (Organization, Santa Fe, NM - #A22092.45320)

#### **UNDERREPRESENTED LOWER-ELEVATION ECOSYSTEM TYPES**

In the Tongass as well as many other national forests, many of the most valuable forest habitats have already been logged. The remaining roadless areas should remain exactly that, roadless and should be proposed as wilderness areas, particularly those forests with remaining stands of old growth. Much of the currently designated wilderness in the Tongass encompasses inhospitable areas, and is barren, or snow covered much of the year. Additional roadless areas could augment lowland and coastal habitats not adequately represented in current roadless areas. These should be managed for non motorized uses only. (Individual, Seldovia, AK - #A8803.25000)

Roadless areas contain habitat for numerous species, including many at risk of extinction. Better representation of all natural communities in protected areas means better protection for the myriad species they support. In general, higher numbers of species are associated with the low- and mid-elevation ecosystems found in roadless areas compared to high-elevation ecosystems. For instance, in the Southern Rockies, alpine tundra has roughly 50 associated vertebrate species while lower elevation sagebrush and semi-desert shrublands have over 160 vertebrate species. Thus, protecting roadless areas will also protect more species-rich ecosystems. This could potentially prevent many species from

becoming imperiled and eventually listed as Threatened and Endangered under the U.S. Endangered Species Act.

SREP's analysis of roadless areas in the Southern Rockies has revealed that numerous species listed as rare or imperiled by state Natural Heritage Programs, as well as several species listed as Threatened and Endangered under the U.S. Endangered Species Act, occur within roadless areas. Although further research is needed to determine the specific habitat requirements for these species, most of their remaining habitat has likely been destroyed or degraded on multiple-use public lands and private lands. Thus, roadless areas may offer a last refugia for these species, and protection of roadless areas will undoubtedly benefit many of these at-risk species. Large roadless areas are especially critical to maintain refugia for at-risk wide-ranging and sensitive species, such as wolverine, lynx, or grizzly bear, which require large tracts of land relatively free of human presence and influence. Nationwide, roadless areas support more than 280 threatened, endangered, proposed, or sensitive species. (Organization, Denver, CO - #A21367.25000)

#### **AREAS WITH BIOLOGICAL INTEGRITY AND ECOLOGICAL SIGNIFICANCE**

We wish to comment primarily on the issue of using biological integrity and ecological significance - in addition to size - as primary criteria by which additional areas are considered eligible for roadless area protection. (Business, Coarsegold, CA - #A1589.50500)

### **1331. Public Concern: The Forest Service should provide an independent scientific assessment of roadless areas 1,000 acres or more and ecologically significant areas less than 1,000 acres.**

#### **PERMANENTLY PROTECT THESE AREAS**

We urge the Forest Service to develop a policy that:

Provides an independent scientific assessment of roadless areas of 1,000 acres or greater and ecologically significant areas less than 1,000 acres. These areas, along with inventoried areas, should be permanently protected. (Organization, Bloomington, IN - #A28110.45320)

### **1332. Public Concern: The Forest Service should designate areas as roadless based on size considerations.**

#### **AREAS 10,000 ACRES OR MORE IN IDAHO**

Outside of Alaska, Idaho has the largest amount of inventoried roadless areas. Over 45% of Idaho Forest Service land is designated as inventoried roadless areas. On a national level, only 23% of the total Forest Service Land is designated as IRAs; this means that Idaho already has twice the national average. With this in perspective, we suggest that the 5,000 acre figure used to qualify a parcel of land as an IRA is too small. From a fairness perspective, the vastness of Idaho's forests should be taken into account, and if the plan is absolutely needed, nothing smaller than 10-15,000 acres should be inventoried as a roadless area in Idaho. If this were taken into consideration, the plan would affect Idaho much more proportionately to the rest of the country. (Association, Boise, ID - #A20607.45300)

#### **AREAS 5,000 ACRES OR MORE**

We have supported and continue to support the Roadless Area Conservation Rule. We are very much offended by the Bush Administration's plans to ignore this Rule and allow logging on National Forest roadless lands greater than 5,000 acres. As long standing Idaho residents, we are particularly concerned about the threat to Idaho's remaining roadless areas which will occur now that the Bush administration will allow logging and road building on these lands. Important portions of Idaho's National Forests lands are now threatened—areas such as the Selkirks, the Clearwater, the South Fork of the Salmon, the Boulder-White Clouds, the South Fork of the Snake, and many others. (Individual, Coeur d'Alene, ID - #A13448.45310)

A roadless area should be protected if it is an inventoried roadless area of 5,000 acres or more. (Individual, Salem, OR - #A13948.45310)

### **1333. Public Concern: The Forest Service should include smaller unroaded areas in a national roadless rule.**

#### **AREAS LESS THAN 5,000 ACRES**

While protecting inventoried roadless areas will contribute to overall conservation objectives, many scientists believe that roadless areas smaller than the arbitrary 5,000-acre criteria are biologically significant and should also be considered as part of your forthcoming roadless area rule. In December, 1998 170 scientists signed a letter to the Service urging the agency to protect all biologically significant areas.

The Alliance for the Wild Rockies strongly believes the final rule must incorporate the best available scientific information. With that in mind, we urge the Service to implement a policy that includes all biologically important roadless areas within the National Forest System. NO AREA, INCLUDING THE . . . . MANY ROADLESS AREAS LESS THAN 5,000 ACRES, SHOULD BE EXEMPTED FROM THE FINAL RULE. (Organization, Missoula, MT - #A17234.45310)

I firmly believe that the USFS must reduce the minimum size that an inventoried roadless area must be, when they look to the many unroaded areas that might be added. It is imperative that their analysis must expand to those areas without roads that are LESS THAN 5,000 ACRES. Although many of these areas are too small for wilderness, many of them contain key habitats for a variety of species. They are also special places for humans.

Currently none are identified that are less than 5,000 acres in size. Each new unroaded area should not necessarily be examined for potential wilderness designation, but for their roadless character. Areas less than 640 acres and narrow slivers between existing roads should probably still be excluded. (Individual, Grangeville, ID - #A830.45310)

I urge you to maintain the Roadless Area Conservation Rule, and include roadless areas of less than 5,000 acres and larger if it is adjacent to an existing wilderness area. (Individual, Roanoke, TX - #A4626.45310)

While protecting inventoried roadless areas will contribute to overall conservation objectives, scientists believe that roadless areas smaller than the arbitrary 5,000-acre criteria are biologically significant and should also be considered as part of your forthcoming roadless area rule. In December, 1999 170 scientists signed a letter to the Forest Service urging the agency to protect all biologically significant areas. (Organization, Nevada City, CA - #A4941.45310)

While protecting inventoried roadless areas will contribute to overall conservation objectives, scientists believe that roadless areas smaller than the arbitrary 5,000-acre criteria are biologically significant and should also be considered as part of your forthcoming roadless area rule. In December, 1998 170 scientists signed a letter to the Forest Service urging the agency to protect all biologically significantly area. The scientists' letter said:

There is growing consensus among academic and agency scientists that existing roadless areas-irrespective of size-contribute substantially to maintain biodiversity and ecological integrity on the National Forests. The Eastside Forests Scientific Societies Panel, including representatives from the American Fisheries Society, American Ornithologists' Union, Ecological Society of America, Society for Conservation Biology, and the Wildlife Society, recommended a prohibition on the construction of new roads and logging within excising (1) roadless regions larger than 1,000 acres, and (2) roadless regions smaller than 1,000 acres that are biologically significant (Henjum et. al. 1994), In our view, a scientifically-based policy for roadless areas on public lands should, at a minimum, protect from development all roadless areas larger than 1,000 acres and those smaller areas that have special ecological significance because of their contributions to regional landscapes.

FOREST GUARDIANS strongly believes the final rule must incorporate the best available scientific information. With that in mind, we urge the Service to implement a policy that includes all biologically

important roadless areas within the National Forest System. There is no scientific justification for the exemption of these lands from roadless area protection. (Organization, Santa Fe, NM - #A22092.45320)

#### **AREAS LESS THAN 2,000 ACRES**

We should even be protecting roadless areas under the 2,000 acre limit that were omitted from current Forest Service inventories. (Individual, Eugene, OR - #A17989.45300)

Roadless Areas under 2,000 acres should also receive additional protection through the forest planning process, especially destructive off road vehicle use and hard rock mining. (Individual, Eugene, OR - #A17989.45300)

#### **AREAS 1,000 ACRES OR MORE**

The role of local forest planning and evaluation/management of the roadless areas should be INITIALLY limited to qualifying areas of 1000 acres or more for protection management. Once all of the roadless areas have been selected then, under the USFS protection and broad guidelines, and only then should local districts begin their management plan. (Individual, No Address - #A101.45320)

The Forest Service should protect all roadless areas greater than 1000 acres in size, but they should especially focus on low-elevation forests that are not adequately represented in current federal wilderness areas, but that contain some of the highest-quality and most productive fish and wildlife habitat. (Individual, Corvallis, OR - #A28160.45320)

I still support the significantly strengthened Roadless Area Conservation Rule even though it still does not go far enough - roadless areas of 1,000 acres or more need to be covered by the rule, especially since we are in catastrophe mitigation made for (1) carbon sequestration of older growth trees as a way to not exacerbate global warming further and (2) fire prevention since over 98% of all fires occur in roaded areas. (Individual, Seattle, WA - #A15157.45320)

Instead of weakening the roadless rules, I urge the Forest Service to strengthen the rule by lowering the 5,000 acre limit of roadless area to 1,000 acres. Unless this acreage limit is changed, National Forest east of the Mississippi will not be protected by the Roadless initiative. The Chippewa National Forest has NO roadless areas. The Superior, with 60,000 acres and the Chequamegon-Nicolet with 69,000 acres must have better protections not less protection. (Individual, Minneapolis, MN - #A10523.45320)

It is important to note that on forests west of the Cascade Crest in Oregon, Washington, and northern California, nearly all inventoried roadless areas are protected by administrative reserves under the Northwest Forest Plan. However, many unroaded areas are unprotected on national forests west of the Cascades, and are open to logging simply because they had the misfortune of escaping the RARE processes in the 1970s. At the time the Forest Service commenced RARE I and RARE II, scientific literature was uncertain whether roadless areas less than 5,000 acres were ecologically significant. Today, we know that roadless areas 1,000 acres or greater are incredibly important for a variety of forest species and functions.

The Forest Service has refused to heed the advice of scientists that unroaded areas that are at least 1,000 acres in size should be protected. For example, the Forest Service on the Gifford Pinchot National Forest recently approved the Acci timber sale, located in the Mount Adams Ranger District. This sale proposes to log 7.7 million board feet of timber, much of it east side old growth as defined by the Forest Service. Not satisfied with logging old growth from the matrix, the agency is proposing to enter the 5,228 acre Monte Cristo Roadless Area. (Organization, Portland, OR - #A12004.45320)

In addition to ceasing road construction, we need to prohibit off road vehicles and stop mining, oil and gas development, and logging on all roadless areas of 1000 acres or more. Public lands are the only places where we have the opportunity to maintain natural areas large enough to make a difference. We need to get this right. (Individual, Deadwood, OR - #A882.90110)

### **AREAS 1,000 ACRES OR MORE WITH A MINIMUM WIDTH OF 1/2 MILE**

This inventory could be done during the upcoming Forest Plan revision, as a prerequisite to any IRA protection or use decision. I recommend an inventory criteria of 1,000-acre minimum size with a minimum width of 1/2 -mile wide. (Individual, Libby, MT - #A2301.45300)

### **AREAS 1,000 ACRES OR LESS**

Areas of 1,000 acres and even less should be considered for roadless designation, as long as they are manageable in their natural conditions to protect their inherent values.

Precedent for designating areas [less] than 1,000 acres in size as roadless areas exists throughout the National Forest system, including 107 acre Odessa Roadless Area (adjacent to the Mountain Lakes Wilderness Area) and the "stand alone" 490 acre Devils Garden roadless area on the Winema National Forest. (Organization, Cave Junction, OR - #A17235.45320)

Roadless areas smaller than 1,000 acres that contain rare plant communities or that are a key part of a watershed should be protected. (Professional Society, Missoula, MT - #A17054.45320)

### **AREAS 500 ACRES OR MORE**

Of course the main characteristic is that there are no functioning roads in blocks of land. I would like to see a 500 acre minimum but would be willing to compromise at 1000 acres. The environmental values include unfragmented habitat for sensitive species (including connecting to travel corridors), unsedimented water courses, native vegetation structure and species (old growth stands and rare plants), natural fire regimes (less fire suppression), allowing indigenous forest "pests" their place in the ecology . . . less human intrusion especially motorized vehicles, no commercial timber harvest and its associated creation of fire prone forest structure. The social and economic considerations must include national pride for conservation of natural ecosystems, the opportunity for recreation in wild places without intrusion by internal combustion pollution (noise and exhaust) and the tourist dollars generated by the recreationalists and scientific research into forest ecology to develop realistic models of forest health. (Organization, Chico, CA - #A25114.45100)

Wild Wilderness suggests that roadless areas of 500 acres or more MUST be protected from logging, mining, grazing and specifically from off-road vehicle use. To do anything less is to lay open to new and continued abuses the few lands not yet destroyed by Forest Service mismanagement and incompetence. (Organization, Bend, OR - #A19225.45300)

The Roadless Area Conservation Rule should provide for the inventory and protection of smaller roadless areas, as small as 500 acres east of the Mississippi River, and 1000 acres west of the Mississippi. DellaSala and Stritholt (1999) have documented the importance of smaller roadless areas, which share many attributes in common with inventoried roadless areas, including:

- Source areas for recolonization of native forbs, lichens, and mycorrhizal fungi
- Source areas for species that are disturbed as metapopulations
- Refugia for species with restricted distributions (endemic species)
- Aquatic strongholds
- Habitats for rare mollusks and amphibians
- Pockets of late-seral forests
- Stepping stones for wildlife movements and dispersals
- Winter habitat for resident birds and ungulate species
- Building blocks for restoring regions that are highly fragmented by agriculture, industrial forestry, urban and suburban developments, and roads. (Organization, Washington, DC - #A27037.45300)

**AREAS 150 TO 200 ACRES OR MORE**

End logging, off-road vehicle use and road building in all unroaded areas 200 acres and larger, and in any roadless area of 150 acres and larger if it is adjacent to an existing wilderness area. (Individual, Roanoke, TX - #A4626.90110)

**AREAS LARGE ENOUGH TO ALLOW NATURAL PROCESSES TO WORK**

According to the principles of conservation biology, roadless areas should be in large enough acreages (we might call them core habitat areas) where natural processes can be allowed to work. If a typical stand replacement fire (such as on our forest) is 10,000 acres then the roadless area should be five times that size to allow one/fifth to be in recovery. Impoverishment of biodiversity is blamed in part upon forest fragmentation which has been previously aggravated by roads and "units". (Union, No Address - #A8392.45300)

**1334. Public Concern: The Forest Service should exclude unroaded areas from roadless designation based on size considerations.****EXCLUDE AREAS SMALLER THAN 5,000 ACRES**

Future designations should not include "unroaded" areas smaller than 5,000 acres, which currently are classified as roaded. Identifying such "islands" of unroaded areas is ultimately a fruitless exercise. Proper ecosystem management requires examination of national forest lands on a watershed scale to determine the proper road density that will provide a balance between ecosystem integrity, forest health, commodity production, and access needs. (Governor, State of Idaho - #A20141.45310)

If the agency decides at this time to adopt "roadless protection" guidance or directives to be applied by agency personnel in the local forest planning process, those directives should address the following:

(1) Not all inventoried roadless areas are equal. Conditions on NFS lands have changed in the past two decades, and as a result not all inventoried roadless areas have the same importance or value. Some roadless areas have become significantly smaller in size--others may have roads and other nearby developments that diminish roadless values. For example, roadless parcels adjacent to ski areas may have some roadless characteristics, but not the full range of natural characteristics that would commonly be associated with a "roadless" designation. These areas are not remote are not "undisturbed landscapes", and inevitably are influenced by nearby resort operations. As a matter of general forest planning guidance, parcels smaller than 5,000 acres in size should not be considered for roadless designation, nor should areas immediately adjacent to developed recreation sites. (Permit Holder, No Address - #A5285.45300)

No area under 5,000 acres should be considered roadless. (Individual, Anaheim, CA - #A953.45310)

Everyone should agree that the reason we are all drawn to the National Forests are for the trees and the environment they provide. However, this is the point at which we all differ in the amount and kind of management we feel should be provided. The Roadless designation to land should only entail those areas which exceed 5,000 acres in size. To afford areas of lesser size the designation could preclude some areas from reaching their greatest public benefit while balancing the conservation interests of the land. (Business, Twin Bridges, CA - #A8808.45310)

Not all inventoried roadless [areas] are equal. Conditions on NFS lands have changed in the past two decades, and as a result not all inventoried roadless areas have the same importance or value. Some roadless areas have become significantly smaller in size--others may have roads and other nearby developments that diminish roadless values. For example, roadless parcels adjacent to ski areas may have some roadless characteristics, but not the full range of natural characteristics that would commonly be associated with a "roadless" designation. These areas are not remote, are not "undisturbed landscapes", and inevitably are influenced by nearby resort operations. As a matter of general forest planning guidance, parcels smaller than 5,000 acres in size should not be considered for roadless

designation, nor should areas immediately adjacent to developed recreation sites. (Permit Holder, Winter Park, CO - #A13541.45310)

#### **EXCLUDE AREAS SMALLER THAN 500 ACRES**

No area under 500 acres should ever be considered as “roadless”. (Individual, El Dorado, KS - #A5117.45310)

### **1335. Public Concern: The Forest Service should attempt to designate roadless areas in close proximity to each other.**

Distribution. A group of IRAs in close proximity (within a mile or so) is preferable to a widely scattered bunch of IRAs. A close group of IRAs has more connectedness, and the surrounding landscape has a more wild and remote feeling.

In contrast, a widely scattered bunch of IRAs has the appearance and feeling of “islands” in the surrounding developed area. It’s better than nothing, but it doesn’t have the same wildness. It’s more of an “oasis” feeling, which is still okay but not as wild as a group of IRAs. (Individual, Libby, MT - #A2301.45000)

### **1336. Public Concern: The Forest Service should designate additional areas as roadless based on current forest plan designations.**

#### **ALL AREAS UNDER CONSIDERATION FOR RESEARCH NATURAL AREA OR SPECIAL INTEREST AREA STATUS, REGARDLESS OF PROXIMITY TO ROADS**

We ask that all areas presently under consideration for Research Natural Area or Special Interest Area designation be included for protection, regardless of their size or proximity to roads. (Association, Kelsey, CA - #A15815.25000)

### **1337. Public Concern: The Forest Service should designate areas as roadless despite existing infrastructure.**

#### **AREAS WITH PRIMITIVE ROADS OR OFF-ROAD VEHICLE ROUTES**

The presence of primitive but “classified” roads, such as primitive jeep trails, should not disqualify areas. (Organization, Missoula, MT - #A17950.45525)

Wildlands CPR is adamantly opposed to the exclusion of potential roadless areas on the basis of off-road vehicle routes. User-created two-tracks, ORV routes, and other primitive travelways, for example, should not be used to exclude an area for roadless and wilderness designation. To whatever extent the final rule includes road definitions, they should be clarified to ensure that only actual roads, deliberately constructed and maintained as such, intended for and capable of use by street-legal passenger vehicles, be counted as roads when making these determinations. This concern extends to both areas already inventoried as roadless as well as uninventoried areas that would otherwise meet the roadless criteria. (Organization, Missoula, MT - #A21359.45620)

#### **AREAS WITH GHOST ROADS OR WAYS**

Two-track roads and “ghost roads” should not disqualify an area from roadless designation; we need to save these remnants, recover and reconnect them. (Individual, Flagstaff, AZ - #A5026.45522)

#### **AREAS WITH ROADS THAT ARE CLOSED OR NOT IN USE**

Roadless is not always roadless yet should be managed as such. In Idaho we have miles of unused roads, and un-maintained roads in the forests. Since these roads are not used or they are closed, these areas need rehabilitation and protection as roadless areas. Due to the low quality of the roads, overgrowth, and lack of use many areas appear roadless and since the future holds no further need for these roads we should include them in our roadless maps. Reseed and rehabilitate the roads and leave it at that (Individual, Boise, ID - #A64.45522)

**1338. Public Concern: The Forest Service should not designate areas with existing infrastructure as roadless.****AREAS WITH ROADS**

Roadless areas must only be mapped where there are NO roads. Just because a non-system road exists is no reason to include it in a “roadless” area. (Individual, Ridgeway, PA - #A4933.45100)

Areas that have roads that are unmaintained or abandoned, or blocked by the USFS are not “roadless,” they are merely abandoned or not maintained. It appears that the USFS is calling many of these areas roadless. (Individual, Stayton, OR - #A1042.45200)

I’m sure communities near roadless areas already have roads or there wouldn’t be communities. By definition if you build a road in a roadless area it is not roadless. What nutcase wrote these questions? (Individual, Atlanta, GA - #A4509.45000)

Inventoried roadless areas that contain old, overgrown or obliterated should not qualify for status in the category. The USFS must map and list all roads (new and old). (Individual, Viola, ID - #A23458.25200)

The Summary Section of the DEIS referenced the following statement by President Clinton dated October 13, 1999:

“Within our national forests there are large parcels of land that don’t contain roads of any kind, and in most cases, never have . . . “ (DEIS, S-1). Notwithstanding the President’s direction to develop regulations for these roadless areas, the Proposed Rule departed from the President’s direction and now encompasses lands which are in fact roaded. If this program is truly directed toward roadless areas, then only those areas without roads, ways, stock driveways, etc should be included. (County Attorney, Grant County, OR - #A17667.45512)

**AREAS CONTAINING ROADS THAT MIGHT QUALIFY AS VALID REVISED STATUTE 2477 RIGHTS-OF-WAY**

No area should be considered roadless if there is any road that might qualify as a valid RS-2477 right-of-way. (County Administrator, Saguache County, CO - #A28774.45510)

**AREAS WITH TRAILS**

Roadless areas should not contain anything that resembles a trail. If a trail exists, it should be for multiple uses. If a trail is 70” wide, it should be open for 4WD vehicles even if it fails to meet “road” requirements. Single-track trails are sufficiently wide for motorized bike access that should also be permitted. Snowmobiles may also take advantage of existing trails in inventoried roadless areas. (Individual, Helena, MT - #A150.91110)

**1339. Public Concern: The Forest Service should designate areas as roadless despite historic motorized use.**

It infers that those areas not recommended to be designated as roadless areas are somehow unsuitable or inferior. Burke Branch is not designated as roadless yet, but it is ideal for roadless designation and only has not been designated as so because of historical use by ATV riders despite it presently being protected by a permanent injunction against such use.

Who determines “potential,” “interest,” and “low wilderness value”? We continue to erode our wilderness areas without considering the need to develop new areas to perpetuate our inheritance. (Individual, Brookport, IL - #A17229.45624)

### **1340. Public Concern: The Forest Service should not designate areas with specific resources as roadless.**

#### **AREAS WITH NATURAL RESOURCES**

Roadless areas are to remain roadless only if they do not offer extractive resources that further the needs of society or they were designated as a national park or wilderness before the Clinton/Gore administration started their silliness. First and foremost priority of Land and Resource management should be to support and compliment the society with the renewable and non-renewable extractive resources that are present on the land in question. (Individual, Hamilton, MT - #A94.65000)

Your role in forest service lands is to first manage the development of natural resources and to issue permits for mining and grazing and for timber. Some entity needs to control the acres so that we do not have the problems before the Taylor Grazing Act but again be careful of your management to stifle the economy. Without some sort of control of livestock permits this may cause a battle similar to early part of the 20th century between the cattleman and the shepherd. (Individual, Elko, NV - #A4853.65000)

Additionally, for logging, grazing and mining requirement, we need a policy of resource management, not resource lock-up. (Individual, Olathe, KS - #A5001.65000)

### **1341. Public Concern: The Forest Service should not designate areas surrounding private property as roadless.**

It should be clearly recognized that access rights limit the ability of the Forest Service to manage an area as roadless. The agency must adhere to the spirit and letter of the law by providing reasonable access through the local land management planning process. In general, if private property is surrounded by roadless lands, these lands should not be officially designated as roadless. (Organization, Anchorage, AK - #A15542.40100)

## **Inclusion/Exclusion of Specific Areas from a National Roadless Rule**

### **Summary**

**Inclusion** – A number of respondents request that specific areas be included in roadless area protection. These people state that the Forest Service should not allow any exemptions or exclusions from the Roadless Area Conservation Rule. One individual suggests the Forest Service replace any area exempted from roadless designation with equal acreage in smaller roadless areas. Several respondents suggest that national forest districts and certain geographic areas be protected in a national roadless rule. These respondents often mention that roadless areas in the eastern United States are disproportionate to those in the western United States and that areas in the East should be included. Others suggest the Forest Service include roadless areas in a national roadless rule based on proximity to other protected areas including areas adjacent to national parks, designated wilderness areas, and areas that cross administrative boundaries. Some people request that the Forest Service include roadless areas in a national roadless rule regardless of forest plan revision status. An organization asks the Forest Service to include areas that are returning to a wild condition. (A list of specific areas requested to be included in/excluded from roadless area protection is found in Appendix F.)

A number of respondents request protection for Alaskan national forests and specifically request that the Tongass National Forest be included in a national roadless rule. People offer a multitude of reasons for protecting these areas. Some propose the Forest Service include Alaskan national

forests in a national roadless rule for social and recreational values. Others state that they should be included to protect the environment and environmental values such as biodiversity, old growth, wildlife and fish habitat and species, etc. People also request Alaskan national forests be included in order to reestablish the balance of multiple resource use; because these forests should be treated the same as all other forests; because there is much public support for protection of these forests; and as a commitment to global rainforest conservation. Further suggested reasons for inclusion include the importance of these areas to those who rely on subsistence food, to tourism, and to commercial fisheries. Several individuals assert that the Forest Service should immediately implement the Rule in the Tongass National Forest because scheduled timber sales make the Rule even more necessary; while others state that timber sales in these forests are not economically viable. Some Organizations assert that the Forest Service should not use the fact that the Tongass National Forest has a recently revised forest plan as a reason to exclude it from a national roadless rule.

**Exclusion** – A number of respondents assert that specific areas should be exempted from roadless area designation/protection. One group suggests that the Forest Service develop additional criteria to provide guidance to forest managers regarding areas that should be excluded from the Roadless Area Conservation Rule due to prior management activities. Others suggest the Forest Service exclude certain roadless areas from roadless designation/protection based on active management potential, including areas adjacent to recreational sites; special use permit areas or master active management plan areas; areas with existing or future operations at four-season resorts within or adjacent to existing or future special use permit boundaries of ski areas; and areas used for pipeline transportation and oil and gas development. People also comment on what they believe to be the disproportionate amount of acres of roadless areas in the western United States and ask that these areas, as well as national grasslands, be excluded. Others say the Forest Service should exclude certain roadless areas from roadless designation/protection that have recently completed forest management plans.

Some people state that the Forest Service should exclude Alaskan national forests from a national roadless rule because inclusion of these forests, they say, would be contrary to Alaska state and federal laws. One tribal organization asks the Forest Service to recognize that it cannot supercede land allocations on the Tongass National Forest with a national roadless rule. People say Alaskan national forests should be excluded because the Tongass National Forest has just revised its Land Management Plan; because decisions should be made through the local forest planning process; because extensive local forest planning has been completed; because the Tongass Land Management Plan is currently under appeal; because the Chugach National Forest is now at the stage of releasing a Final EIS; and because the proposed Rule was not addressed in the Chugach National Forest plan revision process. Others suggest the Forest Service exclude Alaskan national forests for environmental and forest health reasons. Some suggest they be excluded in order to maintain traditional multiple use management, and to maintain the availability of natural resources upon which local economies depend.

### *Inclusion*

#### **1342. Public Concern: The Forest Service should not allow any exemptions or exclusions from the Roadless Area Conservation Rule.**

I very strongly urge you to exclude ANY exemptions or exclusions that could potentially weaken the Roadless Area Conservation Rule. I especially urge you to ensure that Alaska's Tongass National Forest,

as our nation's largest, receives full protection. In order to preserve our nation's wild forests, and thus our cultural, economic, social, recreational, and biological wealth, I urge you in the strongest tone possible to protect ALL of America's Roadless Areas including Alaska's Tongass and Chugach, from ALL logging, roadbuilding, mining and fossil fuel exploration/drilling. THE PEOPLE HAVE SPOKEN: PLEASE DO NOT IGNORE THEIR VOICES. (Individual, Kennett Square, PA - #A689.10150)

**INCLUDE EACH NATIONAL FOREST DISTRICT**

Do not allow any exemptions for individual National Forests Districts (N.B. most important). (Individual, Long Beach, CA - #A21202.45620)

**1343. Public Concern: The Forest Service should replace any area exempted from roadless designation with equal acreage in smaller roadless areas.**

If you eventually remove the roadless designation from some areas in order to please the folks who live nearby, it is only fair to replace them acre for acre with smaller roadless areas that were not included before. (Individual, Deadwood, OR - #A881.45621)

**1344. Public Concern: The Forest Service should include certain geographic areas in a national roadless rule.**

**INCLUDE AREAS IN THE EASTERN UNITED STATES**

Expand roadless area protection to include all areas in the E. U.S., including those not presently covered as small as 200 acres. No weakening or exemptions. (Individual, Paoli, IN - #A10608.45300)

The National Forests in the east need such protection in smaller roadless areas because of the greater press of civilization and higher population. (Individual, Bethel, VT - #A8684.45621)

The Roadless Area Conservation Rule must be maintained and vigorously defended as previously written. Some of the proposed changes are very bad ideas, such as requiring that roadless areas be at least 5,000 acres. This isn't appropriate in our smaller eastern forests and the previous 1,000 acre threshold should be maintained. (Individual, Decatur, GA - #A19228.45320)

Another factor relating to the protection of roadless areas the Forest Service should consider is the scarcity of roadless areas in the eastern United States. In the first published draft of the proposed Roadless Area Conservation Rule, the Forest Service appropriately highlighted the need for special treatment of eastern areas in part of the proposed Roadless Area Conservation Rule where it stated: "In selecting areas, the responsible official should consider the distance from, and the scarcity of, other unroaded areas, particularly for those areas east of the 100th meridian." Roadless Area Conservation, 65 Fed. Reg. 30275, 30288 (2000) (to be codified at 36 C.F.R. 294.13(b)(2)) (proposed May 10, 2000) (emphasis added). Because only some 726,600 acres of inventoried roadless area remain in the Southern Appalachians, it is imperative that special attention and consideration be given to Eastern roadless areas. Our scarce roadless areas are increasingly in demand for all sorts of recreation, making the need to preserve them more pressing than ever. (Organization, Charlottesville, VA - #A15659.45341)

Superior Wilderness Action Network (SWAN), urges the Forest Service to uphold the Roadless Area Conservation Rule (RACR), as published in the Federal Register on January 12, 2001. SWAN submitted comments during scoping and on the draft environmental impact statement for the roadless rule. Instead of weakening the rule, SWAN urges the Forest Service to strengthen the rule by lowering the 5,000 acre limit of roadless area to 1,000 acres. As we stated in our previous comments, unless this acreage limit is changed, National Forests east of the Mississippi will not be protected by the Roadless initiative. The Chippewa National Forest has NO roadless areas. The Superior, with 60,000 acres and the Chequamegon-Nicolet with 69,000 acres must have better protections not less protection. (Organization, Plymouth, MN - #A7116.10150)

**1345. Public Concern: The Forest Service should include roadless areas in a national roadless rule based on proximity to other protected areas.****INCLUDE AREAS ADJACENT TO NATIONAL PARKS AND DESIGNATED WILDERNESS AREAS**

Several of these roadless areas have been evaluated and rejected for wilderness consideration. However, some of them are adjacent to national parks and designated wilderness areas and can provide larger buffer zones for habitat protection. Therefore they should be maintained under roadless area management until further planning processes can address which roadless areas should be converted to wilderness. (Individual, Ethel, WA - #A11767.45331)

The 5,000 acre, or adjacent to existing Wilderness, condition should be maintained as a requirement for roadless areas. (Individual, Logan, UT - #A13482.45331)

We were also disappointed that the Roadless Rule does not protect uninventoried roadless areas and roadless areas smaller than 5,000 acres, even if such areas were adjacent to existing protected areas (designated Wilderness, wild rivers, national parks, etc.). Ironically, the previous moratorium on road construction in roadless areas, which took effect in March, 1999, did protect some of these smaller roadless areas if they are adjacent to protected areas. We believe protecting smaller "unofficial" roadless areas that have been identified by the Forest Service or citizens is of the utmost importance, especially those adjacent to designated wilderness and other protected areas. We strongly urge the Forest Service to incorporate smaller roadless areas identified in maps submitted by citizen groups into the Roadless Rule; specifically, we ask you to incorporate maps previously submitted by the Aspen Wilderness Workshop and the Upper Arkansas and South Platte Project, as well as other information from conservation organizations in Region 2, into the Roadless Rule. (Organization, Denver, CO - #A21367.45621)

**INCLUDE AREAS THAT CROSS ADMINISTRATIVE BOUNDARIES**

They deserve a broader national protection, one that crosses current administrative boundaries (e.g. Park Service, USFS, BLM, and private holdings), in other words, the values are not necessarily for the USFS alone to determine. An excellent example of such umbrella designation is the proposed Northern Rockies Ecosystem Protection Act H.R. 288, NREPA provides an excellent example of such value designations. (Individual, Boulder, CO - #A28606.12312)

This summer I visited the Sunshine Basin east of Yellowstone National Park. This clearly should be provided the same kind of protection that Yellowstone enjoys. Areas like this must be considered in a context which crosses administrative (e.g. Park Service, USFS, BLM and private) holdings. In other words, the values are not necessarily for the USFS alone to determine. For the northern Rockies, the proposed Northern Rockies Ecosystem Protection Act H.R. 488, NREPA provides an excellent example of such value designations. (Individual, Boulder, CO - #A28606.12312)

**1346. Public Concern: The Forest Service should include roadless areas in a national roadless rule regardless of forest plan revision status.**

In the past, the Forest Service has argued that those forests with plans in the final stages of the revision process should also be exempted from the roadless area policy. But upon closer analysis of forest plans, it is clear the revision process has not proven adequate in assessing either the present problems or future impacts of roading in pristine forests. The revision of forest plans includes a legal requirement to re-inventory roadless areas. Under ideal circumstances, a National Forest would conduct an on-the-ground inventory of roadless areas and evaluate any potential impacts of proposed management activities within or adjacent to these pristine areas. However, many of those reassessments have been sloppy and inadequate. (Organization, Portland, OR - #A12004.12450)

The Wyoming Wilderness Act protected high altitude habitat and did not garner protection for complete ecosystems and watersheds, or the lower mountain regions that would protect large herds of wintering and migrating elk, deer, and moose. The Bridger-Teton and Shoshone National Forests should protect

the wild integrity of the remaining roadless areas in the impending Forest Plan Revision process. (Individual, Jelm, WY - #A27247.20000)

Roadless areas in the National Forests covered by the Northwest Forest Plan are also at risk. During the roadless area “open houses,” Region-6 staff were repeatedly asked why they continued to develop and implement commercial timber sales in roadless areas. Their responses to this concern were uniformly evasive and confirmed that many timber planners in the region intend to log and degrade roadless areas, hence limiting the areas eligible for inclusion in the Wilderness system.

Examples of current timber sales impacting roadless areas in the Willamette National Forest include:

Moose Timber Sale, Sweet Home District, Willamette National Forest (EIS completed, Decision Notice signed). The sale includes commercial harvest in the 5,674 acre RARE I Moose Creek Roadless Area, which currently provides important connectivity for wildlife between the Menagerie and Middle Santiam Wilderness Areas. Moose Creek proper is eligible for designation as a Wild and Scenic River. Moose Creek is also a major tributary to the South Santiam River, which provides municipal drinking water to the communities of Lebanon, Sweet Home and Albany. The proposed timber sale calls for logging 22.5 mmbf and constructing 1.9 miles of new roading (outside the inventoried roadless area).

South Pyramid Timber Sale, Sweet Home District, Willamette National Forest (EA in scoping). This newly proposed timber sale includes two alternatives that call for logging in the Three Pyramids unroaded area (and one alternative that would stay out of the roadless area). As yet, little information has been developed or made available about this timber sale. The scoping notice indicates that between 99 and 209 acres of the roadless area will be logged and that helicopter, skyline, and tractor logging would be allowed. The Three Pyramid’s unroaded area is an extremely popular recreation destination and the South Pyramid Creek trail travels through the heart of the planning area.

Helldun Timber Sale, Middle Fork District, Willamette National Forest (EA completed, currently offered as replacement volume to Scott Timber). While avoiding logging in inventoried roadless areas, the proposed 9 mmbf, 100-acre clearcut Helldun timber sale will have a disproportionate impact on irreplaceable roadless values in the Middle Fork District. Currently, the Helldun ancient forest is part of a 2,000-acre block of fragmented ancient forest that connects the Waldo Wilderness with the RARE II inventoried Cornpatch roadless area. Combined, these roadless areas total over 35,000 acres, one of the largest intact forests in the Middle Fork District. The timber sale calls for logging over the popular Eugene to Crest Trail and degrading the Eagle Creek Special Interest Area, one of only two special interest areas in the Willamette National Forest. The planning area has also been proposed as a Research Natural Area to be preserved for scientific study of its unique ecological characteristics.

Coffin Timber Sale, Detroit District, Willamette National Forest (EA completed, Decision Notice signed, sale unawarded). While the EA for the Coffin timber sale proposed logging 2.77 mmbf from 277 acres of the Coffin/Bachelor Mountain roadless “semiprimitive area” after the decision notice was signed, the volume doubled to 5.37 mmbf. The Coffin Mountain timber sale is located within the Mary’s Creek Sub-basin of the Upper North Santiam watershed, which contributes to the municipal drinking water supply for over 165,000 Oregonians. Many of the slopes within the proposed timber sale are extremely steep. The entire sale is within the transient snow zone in which “rain-on-snow” events associated with logging and road-building often increase peak flows, turbidity and sediment loading to the watershed. (Individual, Washington, DC - #A30150.45500)

### **1347. Public Concern: The Forest Service should include roadless areas in a national roadless rule based on environmental characteristics.**

#### **INCLUDE AREAS THAT ARE RETURNING TO A WILD CONDITION**

The majority of comments received about the roadless initiative in Vermont stated that the roadless initiative was a positive initiative, and that in fact it did not go far enough in protecting old growth forests in the Tongass, and further that it did not go far enough in protecting de facto roadless areas in eastern forests such as Green Mountain National Forest, where many areas are returning to wild conditions after heavy human use in the 19th century. (Organization, Waterbury Center, VT - #A29884.10150)

**1348. Public Concern: The Forest Service should include Alaskan national forests in a national roadless rule for social values.**

I visited Alaska (which included the Tongass National Forest) about three weeks ago. It is a beautiful, peaceful, and serene place! Please protect the Tongass and Chugach National Forests (as well as our National Forests) from any type of Logging, Roadbuilding, and other development. (Individual, Fremont, CA - #A9229.45620)

I have personally seen the beauty of Alaska's Tongass National Forest. Alaska's Tongass National Forest is the only rainforest in the U.S. Not many Americans even know there's a temperate rainforest in the USA. Alaska is the last remaining wilderness untouched by man I only hope and pray it stays that way. Pure, untamed wilderness untouched by man - wilderness wild and free - my God, how can anyone not be awestruck or blown away by the site of a massive glacier in the site of not one but seven bald eagles in their natural habitat - a habitat still pristine, wild, natural and not touched or destroyed by man? This is what I saw on a hike in the Tongass and I will never forget the emotions it worked. To see and experience such beauty made me want to cry I did. These are treasures that no amount of money can buy. (Individual, Dracut, MA - #A6220.45623)

I strongly urge the conservation of the Tongass and our other National Forests and wilderness areas as forever wild.

The oxygen these areas generate is not just physical; it is spiritual oxygen as well, more and more valuable in a society where access to large, unspoiled tracts of natural beauty is under siege from short-sighted, greed-motivated companies and individuals. (Individual, Schenectady, NY - #A30333.45620)

**FOR FUTURE GENERATIONS**

We have so little pristine wilderness left that it is imperative to protect that which remains for future generations. For this reason I also oppose any attempt to deny protection to Tongass National Forest in Alaska. (Individual, Tempe, AZ - #A8713.45623)

I have lived in various parts of the Tongass since 1982 and I treasure it for what it is and want to see it remain this way for succeeding generations. Anymore, such places are rare and rapidly disappearing. It is high time that our nations wakes up and halts this destructive habit which has so altered the environment and ecology of our great land. (Individual, Wrangell, AK - #A24501.45623)

Living in Washington state, I am reminded of the ugly unsightly destruction that follows road building in our National Forests every weekend. If the Tongass rainforest was disturbed as much as the west and south side of the Olympic National Forest, we would be destroying pristine land that can not viewed again in our lifetime or our children's lifetime ever in the same pleasurable manner that it can today. We must protect our heritage and preserve the small areas of land that have not been altered for thousands of years. (Individual, Kingston, WA - #A4414.45623)

**1349. Public Concern: The Forest Service should include Alaskan national forests in a national roadless rule for recreational values.**

Pristine areas of the Tongass are important for fish and wildlife habitat, clean water, subsistence, and recreational activities, all of which contribute to the quality of life for Southeast Alaska residents, and those who visit our area to enjoy an experience that they can't find where they live. I personally use the Tongass for introducing people from all over the world to the incredible beauty of our area as experienced from a kayak. Under Forest Service Permit, I conduct guided tours from several hours to extended overnight periods, and educate my clients to follow a leave-no-trace camping ethic. Road building and logging in these areas would be in direct opposition to that ethic that I am trying to convey to those that use our National Forests for recreation. Our type of operations preserve the forest for all to enjoy in the future. My continued use of these areas depends upon them remaining in a pristine, undeveloped state. Road building and the logging that will follow changes its entire character, never to

be the same again. There are no areas left in the country like the Tongass. Can't we leave this last vestige of true wilderness the way it was meant to be before all others are totally lost? (Business, Sitka, AK - #A24665.45623)

The Chugach and Tongass National Forest embody the definition of reason for people living in and loving Alaska. In what other state in the United States can you commonly see bear and moose with the opportunities to view the elusive wolf and lynx? In what other state can you find not only the fishing opportunities that pristine watersheds provide but also the incredible amount of backcountry wilderness recreation that surrounds those living in Southcentral and Southeast Alaska. (Individual, Cooper Landing, AK - #A17758.45622)

We enjoy the outdoors. Camping in Alaska is great. I support the permanent protection of the Chugach and Tongass National Forest. (Individual, Union City, MI - #A25152.45623)

### **1350. Public Concern: The Forest Service should include Alaskan national forests in a national roadless rule to protect the environment.**

#### **FROM DESTRUCTIVE ACTIVITIES**

In spite of the fact that at public hearings held throughout SE Alaska last summer the majority of Alaskans wanted immediate and irrevocable protection for the Tongass National Forest, the poor forest is once again open to assault from the logging and mining industries.

I have been a resident of SE Alaska since 1968 and have witnessed first hand degradation of one of the most beautiful states in the Union of States. I not only worked on fishing boats, I owned and operated my own boat for a number of years. The bays and areas where I fished no longer exist. They are water deserts fed by slash choked streams and poisoned from the efforts of mining operations.

I lived in Petersburg when thousands of acres were "accidentally" logged in Portage Bay off Frederick Sound because of "confusion" over the boundaries of the timber sale. Cape Fanshaw, Farragut Bay and Pinta Point were areas that were lovely, now they look as though bombs have been dropped on them. And these areas were and are being logged because less visible areas have already been decimated. Prince of Wales used to be a lush, verdant island. It now looks like a mowed off golf course. Gravina Island is becoming an industrial park.

I have written many letters over the years to Murkowski, Stevens, and Young, protesting the treatment the Tongass is being given, and have repeatedly been told I am a lonely misfit and that the majority of Alaskan residents want logging to continue. This was proven false with the testimonies given last summer. (Individual, Ward Cove, AK - #A5673.45623)

The Tongass National Forest needs to be covered in your roadless policy because it has 2 million roadless acres that are right now at risk of logging and other development schemes under the current forest plan. This includes more than 400,000 acres of old growth. Combine that with the fact that the Tongass National Forest has the most heavily subsidized logging program in the entire national forest system (costing taxpayers \$33 million a year) and you have a situation that is NOT good. The Forest Service can't maintain existing roads (including fixing blocked culverts). If it can't do that, it better not be building any new roads! This includes NO boondoggle roads like the proposed Bradfield Canal, Taku River, and Juneau-Skagway roads! (Individual, Minneapolis, MN - #A8375.90110)

Five years ago I spent 3 and a half months living in the Tongass National Forest in Alaska. I was in awe the full duration of my stay. Being somewhere American Bald Eagles (the very symbol our country adopted for pride and dignity) are not a rare occurrence but they flourish, had renewed my sense of patriotism. What would it say about us as a people if we plunder the lands of our chosen national symbol (and the countless other species that are not as lucky to be revered, or even noticed by our population) for the sake of a quick small profit? Why is it that much of the wood harvested from the Tongass National Forest is practically given away to Japan as 'war reparations'? They have more than recovered

economically since World War II ended is 1945. Such practices are no longer necessary. (Individual, East Aurora, NY - #A6187.45623)

American Lands urges the Forest Service to include the Tongass National Forest, the largest National Forest in the system, in the roadless area protection policy. Some 2 million acres of roadless wildlands in the Tongass are at risk of clearcutting, road building, and other development—an area bigger than Delaware and Rhode Island combined.

The Tongass is home to many wildlife species, including salmon, grizzly bears, black bears, river otters, deer, moose, mountain goats, bald eagles, and wolves. This spectacular array of wildlife thrives thanks to the combination of rainforest habitat and Alaska's relatively wild character, which buffers the deleterious impacts of development common in the rest of the country. For example, bald eagles depend on ancient trees for nesting, deer depend on large stands of ancient forest for cover and access to winter forage, and grizzly bears depend on large tracts of healthy forest for food, shelter, and solitude. To survive, grizzly bears particularly depend on wilderness. They simply cannot exist in close and constant proximity to humans.

But the natural beauty and abundant wildlife of the Tongass have long been threatened by clearcut logging and road building. In May 1997, the Forest Service issued a land management plan for the Tongass. During the planning process, scientists from within and outside the agency warned that continued road building and logging in large blocks of old growth forest areas pose a serious threat to fish and wildlife (Powell et al. 1997). The Service's own economists concluded that demand for Tongass timber is at an all-time low and is expected to remain so for at least the next ten years. And, of more than 19,000 public comments to the plan, more than 70 percent supported lower levels of logging and greater protections for fish and wildlife. In short, new scientific and economic information, coupled with the cancellation of long-term pulp contracts and overwhelming public sentiment, have created a critical moment of opportunity on the Tongass.

Unfortunately, the Tongass Forest Plan runs counter to scientific recommendations, public opinion, economic data, and the federal government's commitment to protecting the Tongass. The Plan threatens the future of this incomparable wilderness by authorizing levels of destructive clearcut logging and road building. It allows logging in previously undisturbed areas and more than doubles allowable logging levels for the next ten years over the amount cut last year.

Only about 11 percent of Alaska's rainforest has been clearcut to date, but more than half the best timber stands—which are also the best wildlife habitat—have already been logged. While the Alaska rainforest still boasts healthy populations of fish and wildlife, continued road building and logging would dramatically impact fish, wildlife, and the ecosystems upon which they depend. (Organization, Missoula, MT - #A17234.45623)

It is unfortunate that these so-called representatives of Alaskan residents are actually citizens of Washington, DC, one of the most densely populated cities in the US. It appears they have come to believe that overcrowding and asphalt are the standards to which Alaska should aspire. Perhaps if they actually lived in Alaska they too would be saddened by what has happened to this unique state over the years. The mining, logging, and oil industries, abetted by Murkowski, Stevens, and Young, have all conspired to turn this state into just another, slashed, burned, poisoned, sucked dry piece of land, while they all go to the bank.

Please, please don't make it easy for them. Protect the roadless watersheds that are left in the Tongass National Forest. This forest is a special case, but not in the sense that it should be exempt from protection. It should have even more stringent protection. It is the last little bit of "wild" forest left in the US. (Individual, Ward Cove, AK - #A5673.15100)

#### Case for conserving America's wildest roadless forest

As background, it is useful to point out that that Chugach National Forest (CNF) was specifically created in 1907 by President Theodore Roosevelt to protect its unique character, which included fisheries protection as well as the protection for forests and watersheds. Today, more than ever, this need still exists.

The Chugach is the wildest and most-glaciated National Forest in the national forest 2.7 million acres of the 5.5 million in the Chugach is classified as rock, snow and ice. At 98% inventoried roadless, more than half of the roadless areas on the Chugach are classified as “rock, snow and ice”. [\*Footnote 1: The Chugach is 98% inventoried roadless-multiplied total CNF acreage of 5,467,615.45 y 0.98 to get = (5,358,263.141) then divided by 2.718,842.89 (total rock, snow and ice acreage) and multiplied by 100 to get 50.741122980619235542926991162489 or 51%.] that public resources be protected. Too often, true public resources (those resources from which the general public benefits, such as clean air and water or productive soils) are confused with extractive resources (those resources leased to private companies, such as timber, minerals or oil and gas). The disservice to Americans is profound. Clean air and drinking water is polluted, fish habitat compromised and taxpayers left to foot the clean-up bills. (Organization, Anchorage, AK - #A23038.45622)

#### **BECAUSE IT WOULD PREVENT COSTLY AND ENVIRONMENTALLY DAMAGING STATE HIGHWAY CONSTRUCTION PROJECTS**

Protecting all roadless wildlands on the Tongass under the roadless policy would prevent costly and environmentally damaging state highway construction proposals. Instead of investing limited resources into construction of roads like those up the rugged Lynn Canal from Juneau to Skagway, from Sitka to Baranof Warm Springs, across the Cleveland Peninsula, or up the Bradfield Canal to Canada, devote those scarce funds to improving the most natural and cost-effective transportation route in Southeast Alaska—the Alaska Marine Highway System. (Organization, Juneau, AK - #A23091.90120)

#### **BECAUSE THE ALASKA STATE FOREST PRACTICES ACT IS INEFFECTIVE**

Throughout my twenty year tenure on the Tongass I saw the atrocities wreaked upon the land by the long term contracts which now pale when compared to the effects of logging practices wreaked upon the 800+ square miles of forest land grants from the Tongass to the Alaska Native Corporation under ANSCA. These lands have now been largely liquidated of timber, with all raw log export to the Orient, under the toothless and ineffective Alaska State Forest Practices Act. (Individual, Sitka, AK - #A1056.65200)

### **1351. Public Concern: The Forest Service should include Alaskan national forests in a national roadless rule to protect environmental values.**

#### **TO PROTECT ECOLOGICAL CHARACTERISTICS**

Of great concern to me are the political forces that would like to exempt, or in other ways relieve the Tongass National Forest from the Roadless Rule. I recommend that the rule apply equally to the Tongass, the largest and in many ways one of the wildest forests in the National Forest system.

The current transition in the timber industry of Southeast Alaska is from one dominated by a few large corporations (with massive infrastructure and road-building capability) to one characterized by many small and a few medium-size operators (desiring smaller timber sale offerings and with limited capacity to construct major roads). Institution of a policy to protect the ecological characteristics of remaining roadless areas is best done under such circumstances, when existing industries will be least disrupted. In evaluating the Forest Service’s obligations to provide for multiple uses, we suggest that you evaluate the ability of currently-roaded areas on the Tongass where habitat values have already been compromised, to provide timber to support the existing industry. We note that only 16 percent of the inventoried roadless areas are classified and tentatively suitable for timber harvest (USFS 1997, p.e-164). So it seems that relatively little would be given up. (Permit Holder, Juneau, AK - #A23220.45613)

“The 8.7 million roadless acres in the Tongass National Forest need immediate protection. This area has a high degree of biological integrity and overall ecosystem health is largely due to the quantity and quality of the inventoried roadless areas. Preserving roadless areas is central to maintaining a high degree of biological diversity.” (Individual, Puyallup, WA - #A829.45623)

ACE has been active for many years in conservation of the Tongass and Chugach National Forests because of the numerous and irreplaceable ecological benefits provided by the forests in their currently

wild and un-roaded condition. These benefits, which accrue equally to local communities and the nation, include:

clean air and water, diverse and numerous fish and wildlife populations, and the ecological, cultural and economic benefits of the intact forest flora.

Roads fragment habitat for fish and wildlife, opening forests to industrial activities and motorized uses that add cumulative impacts, which can disrupt the carrying capacity and biological diversity of the land. (Organization, Anchorage, AK - #A23038.45622)

#### **TO PROTECT BIODIVERSITY**

No exemption should be made for the Tongass Rainforest—and outstanding example of biodiversity which needs to be kept as a part of our heritage. (Individual, San Pedro, CA - #A11584.45623)

I am writing to express my opposition to any change to the Roadless Area Conservation Rule that would allow logging in the Tongass National Forest or any of the national forests currently protected by this rule. I particularly oppose allowing this in Alaska's Tongass rainforest. I was able to visit this area recently and was impressed by both the diversity of wildlife and plants present as well as the fragility of the area, particularly the islands. I am concerned that logging roads will disrupt much more than just the logged areas and the noise of the operations will be detrimental to the local wildlife. (Individual, Columbia, MD - #A21226.45623)

The unspoiled forests in Alaska deserve extra protection because of their high level of natural biological richness and the absence of invasive plant species that plagues our California-Oregon landscapes. (Organization, Chico, CA - #A25114.45621)

#### **TO PROTECT OLD GROWTH**

I'm a Finish citizen writing from Finland, Europe. Because we have practically no old growth forests left in Finland and in the whole of Europe, I regularly visit Alaska, especially Chugach and Tongass National Forests just to experience these marvelous ancient forests. I would like to point out that Alaska's forests are highly valued not only in the US but also world-wide. Destroyed landscape and logged forests can be found everywhere in the world, but vast areas of unspoiled landscape and wilderness is something I've only experienced in Alaska. (Individual, Helsinki, Finland - #A2789.45622)

The Tongass, and every forest that still exists, is a jewel that should be looked at admired but not touched. Prime old growth habitat, like that found at Southeast Cove and Fool's Inlet near Anan, AK are scheduled to be logged. Those areas of old growth are ideal habitat for grizzlies and Sitka black-tailed deer. Trees that lie within these areas provide shade to cool the waters for salmon to run. Though there are rules stating that there must be buffer zones surrounding streams, these buffer zones are more subject to disease and windthrow because they are exposed. (Union, No Address - #A17699.45623)

I find it appalling that I even have to write this letter after years of comments, meetings, planning, etc on the current TLMP (1999) which protected over 40 roadless watersheds and the additional roadless rule, were decided upon the whole thing is now jeopardized by the short-sighted Bush administration.

I have lived and worked and depended on the Tongass for almost 30 years of my life. I urge you to implement the above mentioned plans and save as much as is possible of the old growth Tongass. We don't need to log this last remaining area for the few temporary jobs it would provide or to line the pockets of timber company owners and executives while leaving nothing for future generations. (Business, Pelican, AK - #A3370.45623)

A roadless area protection policy that excludes the Tongass National Forest, the country's largest national forest, is patently unjustifiable and clearly contrary to sound science.

As 330 eminent scientists said in a letter to President Clinton in December, 1999, "Excluding the Tongass would severely compromise the legitimacy of any national policy on the protection of roadless areas."

Noting that many species depend on the old-growth forests of the Tongass, the scientists wrote: "The ecological characteristics of old-growth forests require centuries to develop. Clearcutting old growth (at 100-200 year rotations) will permanently reduce its habitat value for old-growth dependent species and building new roads will further fragment this important ecosystem." (As the DEIS notes, the Tongass is a naturally fragmented landscape, with some 22,000 islands.) (Organization, Sitka, AK - #A30486.45623)

Unlike most national forests, the Tongass and Chugach still encompass many undisturbed watersheds with a full complement of all native species, including productive populations of bald eagles and northern goshawks, numerous other forest birds, wolves, brown and black bears, moose, black-tailed deer, mountain goats, and five species of anadromous salmon. Proactive application of the roadless policy in Alaska will help forest managers avoid costly and reactive, restoration management. It is critical that we not squander this chance in Alaska because there are few national forests where we still have such opportunities on this landscape scale.

On the Tongass forest, two million acres of roadless areas have been left open to development under the Tongass Land Management Plan (TLMP), including 450,000 acres of roadless old-growth forest. These roadless old-growth areas are especially critical because only four percent of the Tongass land-base encompasses the low elevation, high-volume, old-growth forest most important to fish and wildlife and much of this rare forest type has already been clearcut. The revised TLMP does not prohibit the harvest of the rare high-volume, old-growth forest stands. Even though the allowable sale quantity has been reduced, if there are inadequate provisions to prevent "highgrading" old-growth stands (cutting the best and leaving the low-quality sites), this plan will permanently eliminate important wildlife and fish habitats and erode the integrity of this ecosystem. The committee of scientists the Forest Service asked to review the adequacy of conservation measures for vertebrate species in the Tongass National Forest Land Management Plan recommended cessation of high grading the higher-volume (classes 6 and 7) old-growth stands. (Organization, Anchorage, AK - #A22992.45622)

#### **TO PROTECT WILDLIFE HABITAT**

The Forest Service roadless draft EIS specialist report on the Tongass (Johnston, May 2000, Biological Resources Effects) provides several reasons for including the Tongass in the roadless policy.

"The Tongass is unique (from other national forests) because the majority of subsistence and game species are integrally linked to the habitat qualities provided by unroaded areas." "Because relatively little is known about the current status, needs and response to management activities for some species on the Tongass, conservative management approaches that emphasize retention of roadless areas may provide a necessary 'buffer' to ensure higher likelihoods of maintaining biodiversity and species viability."

Forest Service databases on vegetation, the tim-typ database, were developed to characterize timber volume for harvest. The tim-typ layer is one which we documented for our National Spatial Data Infrastructure grant. One of the limitations of this database is that it does not characterize differences among forest stands in terms of forest structure. Forest structure, canopy layering and understory plant type, are important factors in determining habitat quality for wildlife. (Individual, Sitka, AK - #A15506.45623)

Of the 17 million acres of the Tongass, only 1/3 contains commercially productive forest. Only 2 million acres of the Tongass contain high volume forest. And only a portion of that forest is coarse canopy old growth forest with structural characteristics which certain species are dependent upon for survival. These stands are also very valuable for timber harvest, and over time have been high-graded by man. Thus, timber sales have and have had a disproportionate impact on habitat. The roaded areas of the Tongass tend to be in valley bottoms where highly productive stands of timber were targeted. New timber sales are scheduled into adjacent unroaded areas or as entries into locations never before targeted. We cannot

afford to lose these areas. Too much valuable habitat has already been lost. It is not a question of acreage, but of quality. (Individual, Sitka, AK - #A15506.45623)

The TLMP revision process was delayed significantly (from 1986 to 1996) by the need to gather research to resolve state and federal resource agencies' concerns over species viability and resource damage. Many reports were produced during that process detailing the need for habitat conservation areas, streamside buffers, and reassessment of vegetation cover datasets' weaknesses in estimating volume, habitat quality, and forest structure. This research resulted in better standards and guidelines, but which still fell short of recommendations by scientific panels in size of old growth reserves, stand structure characteristics within the reserves, headwater stream buffer protections, and others. The TLMP process violated the NEPA process by failing to consider the addition of more wilderness, a shortcoming which is currently being litigated by SCS and others. Goshawk standards do not adequately protect the huge foraging areas required. The USFandWS has been directed to reassess the goshawk population as part of a lawsuit to have the goshawk listed as an endangered species. TLMP did not take into serious consideration the predictable continued shortfall of funds for road maintenance, and consequent continued resource damage. The recent report documenting the condition of road/stream crossings and fish passage damage was not finished in time to affect the TLMP process. Due to these shortcomings, there were an unprecedented number of appeals filed on the TLMP decision. The Lyons decision, now overturned, to remove some areas from the timber base provided more acreage for habitat, but did not address weaknesses in standards and guidelines. (Individual, Sitka, AK - #A15506.45623)

I would appreciate if some form of permanent protection was placed on the Chugach and Tongass National Forests. Unhindered wildlife is becoming increasingly rare in America, and those national forests serve several very important purposes. (Individual, Fargo, ND - #A25160.45623)

#### **TO SAFEGUARD PRIMARY FISH HABITAT**

Including the Tongass in the Roadless Area Conservation plan would safeguard close to 65% of the "Primary Fish Producers" on the Tongass from the harmful effects of roadbuilding and commercial logging, thus retaining a significant number of the existing intact watersheds on the Tongass. In the face of habitat losses elsewhere in the region and the Pacific Northwest, and given the importance of a relatively few watersheds on the Tongass to health and sustainability of the salmon fisheries in Southeast Alaska, expert scientists recommend protecting all the remaining intact watersheds on the Tongass. See Bryant and Everest, *Management and Condition of Watersheds in Southeast Alaska: The Persistence of Anadromous Salmon*, submitted to Northwest Science at 20 (1998). (Organization, Juneau, AK - #A23091.54110)

#### **TO PROTECT NATIVE SPECIES**

Unlike most national forests, the Tongass and Chugach still encompass many undisturbed watersheds with a full complement of all native species, including productive populations of bald eagles and northern goshawks, numerous other forest birds, wolves, brown and black bears, moose, black-tailed deer, mountain goats, and five species of anadromous salmon. Proactive application of the roadless policy in Alaska will help forest managers avoid costly and reactive, restoration management. It is critical that we not squander this chance in Alaska because there are few national forests where we still have such opportunities on this landscape scale. (Organization, Anchorage, AK - #A29062.53100)

### **1352. The Forest Service should include Alaskan national forests in a national roadless rule.**

#### **TO REESTABLISH THE BALANCE OF MULTIPLE RESOURCE USE**

The roadless policy does not undo the good work of TLMP, but adds to it. The roadless rule is necessary in the Tongass to reestablish the balance of multiple resource use that was lost during the era of the 50 year contracts. (Individual, Sitka, AK - #A15506.10150)

**BECAUSE THESE FORESTS SHOULD BE TREATED THE SAME AS ALL OTHER FORESTS**

We hereby specifically name the Tongass and Chugach National Forests in Alaska as included in our specific request for roadless protection, because there is too often an unfortunate tendency among some to somehow allege that these beautiful and largely pristine forests, with their immense and important roadless and wildlife resources, are somehow ‘different’ and should be treated differently than the other forests in our national system.

They shouldn’t. Their roadless areas must also have the full protection of a comprehensive Roadless Protection Rule. (Organization, Madison, WI - #A22099.45622)

I am writing this email to ask you to treat the Tongass the same as other National Forests, nothing more. While the final roadless rule protected some Tongass roadless areas, it arbitrarily left many special roadless areas unprotected. The roadless rule should be strengthened to safeguard all the critical inventoried roadless areas on the Tongass, including Totem and Douglas Bays on Kupreanof Island; Cape Fanshaw and Farragut Bay on the mainland near Petersburg; Virginia Lake near Wrangell; Emerald Bay on the Cleveland Peninsula, north of Ketchikan; and Bostwick Inlet and Creek on Gravina Island next to Ketchikan; and Saltery and Sunny Coves, and Clover Bay on east Prince of Wales Island. (Individual, Juneau, AK - #A10396.45623)

I am particularly offended that the Forest Service is considering treating the Tongass differently than other National Forests by minimizing its inclusion in the roadless area rule. There is no legitimate scientific or policy basis for doing so. (Individual, Seattle, WA - #A11644.45623)

Roadless areas of the Tongass fulfill the same functions that make them so valuable to forests in the Lower 48. Besides sheltering wildlife, they provide high-quality fish habitat and support healthy runs of anadromous fish. They provide supplies of clean drinking water. They offer refuges for quiet, wilderness recreation.

The only difference between roadless areas in the Lower 48 national forests and the Tongass is that the Tongass has more of its roadless areas left intact. Are we to infer, then, that business as usual on the Tongass can continue, clearcutting ever more roadless areas, before having to worry about systematically protecting what is left? (Organization, Sitka, AK - #A30486.45623)

**BECAUSE THERE IS PUBLIC SUPPORT FOR PROTECTION OF THESE FORESTS**

The Forest Service’s historic rule to protect 58.5 million acres of roadless areas in our national forests must be preserved and not weakened. We must continue to preserve our remaining pristine forests, especially Alaska’s Tongass Rainforest. As a local legislator I know that there is overwhelming support for preservation. This is also evident by the more than 1 million citizens who supported the policy in prior comments to your agency. (Elected Official, Berkeley, CA - #A18120.45620)

Alaskans support Tongass protection! At public hearings held last summer in Southeast Alaska, about 60% of those testifying supported immediate protection of the Tongass. (Individual, Bainbridge, WA - #A10563.45623)

**AS A COMMITMENT TO GLOBAL RAINFOREST CONSERVATION**

Protect all roadless areas in all National Forests. The policy should provide protection to the Tongass National Forest, which, as America’s largest and wildest National Forest and the heart of the last great temperate coastal rainforest on Earth, is a key test of our country’s commitment to rainforest conservation. (Organization, Plymouth, MN - #A7116.45620)

The Tongass’s vast expanse of coastal rainforest in southeast Alaska supports abundant wildlife, including the world’s largest concentrations of grizzly bears and bald eagles. The new Forest Service ban on roadbuilding and commercial logging in unspoiled areas of national forests, coupled with the closure of the last subsidized Tongass pulp mill in 1997, offer a unique opportunity—one that

Americans favor overwhelmingly - to save the millions of acres of this ancient rainforest still standing. (Individual, Mason City, IA - #A10326.45623)

The Tongass must be protected. How can we be concerned about the rainforests of the tropics when our own temperate rainforests are being destroyed? Forests of large trees are the ideal vegetation for an area with that much rain. They soak up the water and recycle it into the atmosphere.

Erosion can be extremely severe in a steep and rainy area such as SE Alaska. I hoped that when the contracts with the Japanese companies were ended, the Tongass had a chance, but it always seems to be threatened again. Please don't sacrifice it. (Individual, Northfield, MN - #A22395.45623)

### **1353. The Forest Service should include Alaskan national forests in a national roadless rule for economic reasons.**

#### **BECAUSE OF THEIR IMPORTANCE TO THE LOCAL ECONOMY**

The Chugach National Forest was established primarily to protect its fish, wildlife and recreational resources. Much of the Chugach is roadless and provides exceptional opportunities for outdoor recreation, including fishing, hunting, kayaking, hiking, skiing, wildlife viewing, and photography, as well as an expanding tourism industry. Compared to the Tongass, the availability and value of timber are much lower on the Chugach. In terms of sustainable economics, the fish, wildlife, and recreational values of the Chugach certainly outweigh even a small-scale commercial timber industry. (Organization, Anchorage, AK - #A29062.45100)

Members of the Alaska Center for the Environment both use and reside within communities nearby the roadless areas of the Chugach and Tongass National Forests. Our members rely on these intact forest lands, rivers and wetlands for activities including hiking; camping; sport and subsistence hunting; sport, commercial and subsistence fishing; kayaking; wildlife viewing; backpacking and general aesthetic enjoyment and solitude. ACE members also include Alaskan small business owners involved in low-impact commercial operations that include tourism enterprises, cottage industries and photography whose profitability is directly linked to protection of forest resources and wilderness character.

Because their activities are incompatible with roads, commercial logging, mining, and oil and gas development, our members will avoid areas with these impacts. Our members seek roadless areas for their recreational, subsistence, economic and spiritual fulfillment. If the roadless rule is revoked, given loopholes or changes, held in violation of law or enjoined, ACE and its members will be irreparably harmed. (Organization, Anchorage, AK - #A23038.45622)

I support including the Tongass National Forest in the Roadless Rule. The large-scale clear-cutting that has occurred in this forest is a travesty—to blot the environmental legacy of every administration that allows it to continue. There is absolutely no excuse for allowing this assault on the environment to continue.

Economically, the large-scale clear-cutting has allowed a couple of large corporations to profit at everyone else's expense. American taxpayers have largely unknowingly subsidized—for total of over half a billion dollars since 1992—hundreds of miles of roads through old-growth rainforest. Native Americans have watched their subsistence lands and game populations diminish to the point where further declines in habitat will—without question according to wildlife biologist in the area—lead to a shortage of deer and increased conflict among users (Ecotrust, "Forest Condition in Southeast Alaska," 1999), Local businesses such as forest products, commercial and sport fishing, and ecotourism have been stifled because of their inability to compete-or-exist-with the heavily subsidized logging giants.

Lack of economic diversity has affected regional economic health. With the closing of two pulp mills this decade, the regional economy is changing rapidly with a growing emphasis on activities that build on the natural wealth. According to research by Ecotrust and others, significant opportunities in ecotourism, small scale, value-added forest products and seafoods are part of the emerging economy. Subsistence and traditional use also remain a major element of community life. Based on 1990 census

figures, residents of Southeast [Alaska] harvested over 6.4 million pounds of wild foods—at a replacement cost of \$5 per pound, this represents an annual value of \$32 million.

Including the Tongass in the Roadless Rule and protecting the remaining roadless areas will help residents meet the needs of the future rather than prolong past mistakes. It will save taxpayers money—and it won't exclude logging because the existing roads network can be used to access timber outside of roadless areas. (Individual, Cordova, AK - #A8044.45623)

Please do not allow any exemptions or exclusions that would undermine or weaken the Roadless Area Conservation Rule. For example, Alaska's Tongass and Chugach National Forests much included in any national prohibition on logging and roadbuilding. Exempting them would permanently damage the biological integrity and ecosystem health of our large remaining temperate rain forests. It would also make no sense economically, as taxpayers stand to lose million of dollars from the below-cost timber sales. Recreational use by hikers, bikers, boaters, and other non-extractive users brings in most of the money that our national forests contribute to the national economy. (Individual, Auburn, CA - #A30708.45623)

#### **BECAUSE MANY ALASKANS RELY ON SUBSISTENCE FOOD**

I implore you to include the Tongass and Chugach Forests in the roadless protection rule as it was written into the Federal Register on Jan. 12, 2001.

We depend upon subsistence fishing, crabbing, shrimping and occasional hunting around the Tenakee Inlet area for a large part of our existence. We also gather and use berries and local vegetation in our diet. (Individual, Tenakee Springs, AK - #A26905.45622)

As a Southeast Alaska resident, I am writing to express my desire that the U.S. Forest Service maintain the roadless area protection rule recently adopted for the Tongass National Forest. Intact roadless watersheds on the Tongass should be protected and additional road building in the Tongass should be prohibited. New road building and associated timber harvesting will adversely impact my use of forest resources. I depend on the Tongass to provide myself and family with salmon, wild berries and other traditional foods. We also depend on the forest for wilderness recreation. These activities would be negatively impacted by new road building. (Individual, Juneau, AK - #A29872.45623)

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. (Individual, Ashland, OR - #A23399.45623)

#### **BECAUSE TIMBER SALES ARE NOT ECONOMICALLY VIABLE**

Timber Sales in the Tongass do not make fiscal sense. The taxpayers of the US lose money. According to the Roadless DEIS, timber sales in the Tongass result in a net revenue loss of \$178 per thousand board feet of timber (p. 3-184). If the Tongass National Forest sells 539 mmbf of roadless area timber over the next 5 years as planned, the total net loss to the government, according to the Forest Service, would be about \$96 million. This is likely a conservative estimate, since the agency typically underestimates the costs of its timber program. (Individual, Sitka, AK - #A15506.45626)

It makes absolutely no sense to: build roads, log, mine or drill the National Forest in Alaska. The cost of harvesting is too great for a fair return to the government. In essence, the Alaskan trees are just given away to anyone that will remove them. The MFB (or ton) price is so low that there is absolutely no

public benefit from this type of operation. However, there is public benefit for recreation in an uncut forest. (Individual, Shreveport, LA - #A24980.45622)

**BECAUSE TOURISM INDUSTRIES DEPEND ON THE TONGASS NATIONAL FOREST**

Our business is built around and dependent on our wild forests, which is why we support the PERMANENT PROTECTION of Chugach and Tongass National Forests, and would like to see the Roadless Rule implemented as it stands. (Business, Homer, AK - #A15420.45620)

As professional wildlife photographers, our business is built around and dependent on our wild forests, which is why we support the permanent protection of the Chugach and Tongass National Forest, and hope you implement the Roadless rule as it stands. (Business, Anchorage, AK - #A14076.10150)

Salmon require clean, clear and cold streams to successfully spawn. The sedimentation of rivers due to high runoff caused by logging reduces the number of fish. This effect does not take years to be noticed. It is immediate and long lasting. The soil on the islands of Southeast Alaska is only 2-8 inches deep. This thin layer is easily washed away by the precipitation of a temperate rainforest.

Fishing is more than a way of life here in Alaska. Salmon and steelhead trout bring tourism and commerce to communities across the state. I urge you to consider the drastic damage that logging has inflicted on salmon populations in the Tongass National Forest. (Individual, No Address - #A10390.45623)

We request the Forest Service include the Tongass National forest in the roadless policy. Our fly fishing business, which operates on streams throughout northern Southeast Alaska, depends on healthy watersheds and streams to provide catch and release fishing opportunities for salmon, Dolly Varden, cutthroat and steelhead. Our trips are also enhanced by the remote "wilderness" experience, which are still available in many non-roaded areas.

The Forest Service has the opportunity to provide additional protection to a national forest that is home to some of the large intact wild salmon and steelhead runs in the world. Roadless protection would not only benefit businesses like ours but also subsistence users, sport and commercial fishermen. (Business, Juneau, AK - #A28683.45623)

**BECAUSE ROADLESS AREAS SUPPORT THE COMMERCIAL FISHERIES IN ALASKA**

The commercial fishing and seafood processing industry accounts for approximately 20 percent of Southeast Alaska's private industry employment. Commercial fishing provides large incomes, over a short summer season, to a broad spectrum of Southeast Alaskans. This income provides the critical source of capital to most rural communities, where year-round employment is scarce. The industry is dominated by salmon harvesting, which depends on high-quality stream habitat in the rainforest. (Organization, Plymouth, MN - #A7116.75000)

I am writing to express my disapproval of the recent attempts by the Bush Administration to overturn the current protection of roadless areas on Alaska's Tongass. A resident of Tenakee Inlet has drawn my attention to this issue. This proposed policy change would affect Crab and Saltery Bays in the Inlet. If logged or clear cutting were allowed in Tenakee Inlet, it would not only affect the majestic view, but also destroy people's way of life. There are hundreds of Inlet locals who rely on the land and inlet to provide for their families. Commercial fishing is the area's largest employer. These men's entire livelihood is tied to the salmon population. In fact, 80% of all of Southeast Alaska's salmon need the streams of the Tongass for spawning and reproducing. According to the Forest Service and Alaska Fish and Game, as many as 66% of logging roads cross over active salmon reproductive streams and 85% of resident fish streams crossing are not adequate for fish passage. (Individual, Cambridge, MA - #A19185.75400)

I am a 26-year resident of Southeast Alaska, in the heart of the Tongass National Forest. My two sons, husband, and I commercial fish for salmon, as well as other fish and crab species in the waters

surrounding the Tongass. Our livelihood depends on the health of the habitat for those species, both upland and marine. As you know, anadromous habitat, as well as marine ecosystems are directly and adversely affected by logging, mining, road construction, and other development activities. (Individual, Petersburg, AK - #A5427.75500)

One thing I learned really caught my eye; the Forest service and Alaska Department of Fish and Game report that as many as 66% of the logging road culverts over anadromous fish streams, and 85% of resident fish stream crossings, are not adequate for fish passage. Now, commercial fishing is the area's largest employer, much more important than the logging industry. And eighty percent of salmon in Southeast Alaska spawn in Tongass streams. So why should the logging industry be favored over the fishing industry? (Individual, Juneau, AK - #A23012.75500)

### **1354. Public Concern: The Forest Service should immediately implement the Roadless Area Conservation Rule in the Tongass National Forest.**

#### **SCHEDULED TIMBER SALES MAKE THE RULE EVEN MORE NECESSARY**

I do not believe that it is possible to defer the implementation of the roadless policy in the Tongass. Over 500 mmbf of harvest from roadless areas is scheduled in the next 5 years, more than twice that scheduled for the entire remainder of the National Forest System. 75% of the total Tongass timber harvest will come from roadless areas, including St. John the Baptist Bay, Schulze Cove, Cape Fanshaw, Bradfield Canal, Gravina Island, and Moira and Chomondeley Sounds on Prince of Wales Island. With the exception of Prince of Wales, I have been to the other locations. I do not want to see the wild character of these special places lost. I want to be able to visit these locations on Prince of Wales Island and see them as they are today. (Individual, Sitka, AK - #A15506.45623)

The Cholmondeley timber sale, one still allowed under the roadless policy, is an example of this problem. It is bitterly opposed by business owners living in the project area. "The Cholmondeley Project Area was given the highest priority (in the South POW Planning process) because of the large expanses of potentially suitable timber. Through further analysis, the ID team determined that much of the project area was isolated, low-volume timber, and only three areas of forest provided economical timber harvest opportunities" (Cholmondeley DEIS, p.2-1) The Moira sale, if allowed to proceed, will be an even more desperate example. (Individual, Sitka, AK - #A15506.45626)

I would be disgusted to hear of any exception or exemption to the Roadless Area Rule for the Tongass National Forest—or any other. It would seem to me to be a cynical and subversive bid by some to attempt to road and log as much as possible within the years exemption proposed. There should be no exceptions to the Roadless Area protection rule. (Individual, Vashon, WA - #A27214.45623)

### **1355. Public Concern: The Forest Service should not use the fact that the Tongass National Forest has a recently revised forest plan as a reason to exclude it from a national roadless rule.**

*When will the policy apply to Alaska's Tongass National Forest? Its recently revised Forest Plan should be no grounds for exemption, (even if Senators Young and Murkowski sit at the helms of Interior Appropriation and Natural Resource Committees.) A national conservation policy of this caliber should not be bogged down by special interests of extractive industries and their cohorts in congress. A National RA policy should not be riddled with exceptions.* (Organization, Albany, OR - #A19057.45623)

The past justifications for exempting the Tongass from new roadless area protections are unquestionably economic and political, rather than scientific. Consider the following rationales the Forest Service has offered for the Tongass exemption, in the EIS or other public forums:

1. We just finished an expensive and time-consuming forest plan revision that protects a lot of roadless areas.
2. Economic dislocation would be too severe from the reduction in roadless area timber cutting.
3. We'd have trouble trying to meet market demand for timber, as supposedly required by law (The Tongass Timber Reform Act).

This is not a sound rationale. The Tongass is no different from many other forests that have also had plan revisions or amendments in recent years, including plans with significant land protections like those in the Tongass. The entire premise for the proposed rule is that there is a need for national level direction on roadless areas that is not adequately met through the forest planning process. EIS, 1-10 ("Given the history of controversy surrounding the management of roadless areas and the level of interest expressed by the public, the agency has determined that there is a need for national level direction for roadless area management."). The proposed rule incorporates new approaches to roadless area management nationally that are not reflected in the TLMP Revision or any other forest plan. The reasons cited for national level direction in the EIS are as applicable to the Tongass as to any other forest, notwithstanding the TLMP Revision.

Only 4% to 5% of the Tongass includes the high-volume old-growth forest most critical to fish and wildlife protection and also most economically valuable to the timber industry. The most valuable high-volume timber has already been harvested in southeast Alaska. The Native corporations selected the most valuable remaining timber lands in southeast Alaska. This fact and the early industry high grading has resulted in the loss of about 70% of the most productive old growth timber throughout southeast Alaska. This situation significantly reduces forest diversity and poses a substantial risk of long-term population declines of many populations including salmon, brown bears, wolves, and goshawks. Protecting the remaining roadless areas offers some hope of balancing this serious inequity.

For these reasons, the TLMP Revision does not set the Tongass apart from any other national forest, including those with recent forest plan revisions or amendments. Accordingly, the TLMP Revision is not a sound basis on which to exclude the Tongass from the proposed rule. (Organization, Sitka, AK - #A30486.45623)

American Lands strongly believes the final rule must incorporate the best available scientific information. With that in mind, we urge the Service to implement a policy that includes all biologically important roadless areas within the National Forest System. NO AREA, INCLUDING THE TONGASS NATIONAL FOREST, FORESTS IN THE NORTHWEST FOREST PLAN, AND MANY ROADLESS AREAS LESS THAN 5,000 ACRES, SHOULD BE EXEMPTED FROM THE PLAN.

There is no scientific justification for the exemption of these lands from roadless area protection. A new Tongass forest plan would convert 400,000 roadless acres to roaded status on the Tongass every decade. Thus, roadless area protection is very much needed on the Tongass . . . Administration officials have argued that, with a solution (the Northwest Forest Plan) already in place for Northwest forests, no further management changes are needed for the region. Yet roadless area sales are being justified in the Gifford Pinchot National Forest (GPNF). The Service is "committed to sell a certain volume of timber each year—goals that cannot be met if it stays out of every roadless area," a spokesman for the GPNF told the Tacoma News Tribune in 1999.

Because few of those areas identified by the RARE I and RARE II processes were protected and the inventories were incomplete, many areas still intact are sure to slip through the cracks. Roadless areas in the Sierra Nevada that deserve protection may not be spared from logging and road building. For example, in the Tahoe National Forest, which has nearly 3,000 miles of roads, forest activists found that Devils Canyon, which contains the largest stand of old growth trees in Nevada County, Lafayette Ridge, which also has old growth, and an area near Downieville and north of New York Ravine, which is important springs habitat to four rare subspecies of Caddis fly, could be logged and roaded because all three areas are less than 5,000 acres and may be overlooked by the Regional Forester. (Organization, Nevada City, CA - #A4941.45621)

The Proposed Changes included exempting forests which have a revised forest plan. This singles out the Tongass (the only forest so far to have revised its forest plan), even though the forest plan revision was

made prior to the January publication of the roadless rule. The revision of the Tongass Land Management Plan did not adequately consider protection of roadless areas or the recommendation of Wilderness designation. This lack is currently the subject of a lawsuit. Therefore, no exemptions should be given on the basis of whether or not a forest plan revision has been completed. (Individual, Sitka, AK - #A24495.45623)

A recent report, Deconstructing the Timber Volume Paradigm in Management of the Tongass National Forest, (Caouette et al, March, 2000. Pacific NW Research Station PNW-GTR-482) shows how the Forest Service relied on unsuitable data to manage the ecological health of the forest, and therefore failed to maintain that health. The Tongass is a unique forest ecologically because it is naturally highly fragmented and patchy in forest character and value. It has been extensively high graded. The most productive valley bottoms, with the rarest and most valuable forest structure for wildlife habitat, were logged first. Because of that, nothing we do right in the future can repair what we have done wrong in the past. We have put old-growth dependent species at risk. Standards and guidelines in the 1999 Tongass Land Management Plan are not comprehensive enough to ensure that populations can remain viable. (Individual, Sitka, AK - #A15506.45623)

Your recent actions also appear intent on removing protection from the greatest national forest created by Theodore Roosevelt, Alaska's Tongass National Forest. I am strongly opposed to any effort to modify the Jan. 12 roadless policy as it applies to the Tongass.

I am especially concerned regarding an apparent presumption that the Tongass Land Management Plan adequately addressed roadless issues on the forest. This conclusion appears to have been reached in spite of the fact that the plan was concluded years before the roadless policy existed and that TLMP has been set aside by a federal district court decision, in part, over its treatment of roadless areas.

Alone among forests in the National Forest System, the Tongass still contains large blocks of fully functioning old growth ecosystems not yet impacted by industrial logging and associated roadbuilding. I would observe that your agency's own analysis recognizes the importance of the inventoried roadless areas on the Tongass in providing the Forest's "high degree of biological integrity and overall ecosystem health" (p.3-26 Roadless DEIS). This point of view is also shared by 330 of the nation's leading ecologists and biologists that in a December 20 letter to President Clinton declared that the Tongass "still encompasses many undisturbed watersheds with a full compliment of all native species." The scientists correctly point out that it "has been consistently demonstrated that roadless areas are crucial to the protection of our nation's wildlife, fisheries and water resources.

However, much of this low-elevation, high quality wildlife habitat has already been developed on the Tongass. According to the scientists, the 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." Therefore, failing to apply the roadless protections contained in the January 12 rule will merely hasten the day when the Tongass resembles the cut over forests of the Pacific Northwest. I speak from first-hand observation when I say that many areas of this magnificent rainforest already do, such as Central Prince of Wales Island and Zarembo Island. I conclude my comments on the Tongass with another observation from the scientist's letter. The scientists correctly maintain that "there is no scientific basis to exclude the Tongass National Forest from the Forest Service's national roadless policy". Furthermore, they hold that "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, Alexandria, VA - #A22990.45623)

## Exclusion

### **1356. Public Concern: The Forest Service should develop additional criteria to provide guidance to forest managers regarding areas that should be excluded from the Roadless Area Conservation Rule.**

#### **DUE TO PRIOR DEVELOPMENT ACTIVITIES**

This direction leaves unclear exactly where the developed portions are located and available for additional timber harvesting (provided the prescription for the area allows such activities.) When the reexamination of areas eligible for roadless status is conducted during revision of the forest plan, this uncertainty is removed because boundaries of roadless areas are clearly delineated, and the areas to which the roadless conservation rule applies is delineated. However, until the delineation of roadless areas is conducted as part of the revision of a forest plan, additional criteria should be developed in the Forest Service Handbook. These should provide more specific guidance to the Forest managers about areas that should be excluded from application of the rule due to prior development activities. (Civic Group, Roanoke, VA - #A1713.65241)

### **1357. Public Concern: The Forest Service should exclude certain roadless areas from roadless designation/protection based on development potential.**

#### **EXCLUDE AREAS ADJACENT TO DEVELOPED RECREATIONAL SITES**

**Not all inventoried roadless areas are equal.** Conditions on NFS lands have changed in the past two decades, and as a result not all inventoried roadless areas have the same importance or value. Some roadless areas have become significantly smaller in size—others may have roads and other nearby developments that diminish roadless values. For example, roadless parcels adjacent to ski areas may be roadless, but not have the full range of natural characteristics that would commonly be associated with a roadless designation. These areas are not remote, are not undisturbed landscapes, and inevitably are influenced by nearby ski area operations. Generally speaking, areas immediately adjacent to developed recreation sites should not be considered for roadless designation. (Permit Holder, Hood River, OR - #A13230.45617)

#### **EXCLUDE SPECIAL USE PERMIT AREAS OR MASTER DEVELOPMENT PLAN AREAS**

For Northwest ski areas not under the jurisdiction of the NFP, exceptions should be allowed when the risks of fire or disease are present. Exceptions also should be made for existing, reserved, or outstanding rights so that roadless prohibitions do not get applied within special use permit (SUP) or master development plan (MDP) boundaries. Consistent with the original January 12, 2001 rule, management of roadless areas should “not suspend or modify any existing permit, contract, or other legal instrument authorizing the occupancy and use of National Forest System lands.” Finally, any timber cuts incidental to management activities other than road building, such as trail construction or maintenance, should be permitted. (Permit Holder, Hood River, OR - #A13230.45617)

A further remedy would be to include in any action or decision an exemption excluding all lands in the National Forest system, and as to DCC, those areas within the INF, previously identified for resort or recreation site development or expansion from consideration in the Roadless Initiative. This would include all lands within the SUP boundaries of SSA, those identified in master development plans, those lands designated in forest plans for potential ski area development, and Management Prescriptions 13 and 14 in the INF Forest Plan. (Business, Mammoth Lakes, CA - #A30296.45500)

It appears that the following areas are proposed to be included and subjected to the Roadless Area rules:  
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.

The lands proposed for inclusion lie immediately adjacent to the 4,500 acres of land presently under Term Special Use Permits to Heavenly (permits #4056/01 and #4056/02), or adjacent to private held lands which Heavenly owns or controls. In fact, the entire area of Section 7 is already within Heavenly's Special Use Permit boundary and is used for downhill skiing.

They are adjacent to an existing winter sports ski resort that is under an approved Forest Service Master Development Plan and adopted by several other governmental agencies with jurisdiction. The Master Plan was approved in 1996 following an interdisciplinary planning process. The approved master plan is required to be reviewed and updated at regular intervals. Work on the update will begin early in 2002. Beginning in 1998, Heavenly has had discussions with local Forest Service official's plans regarding a possible realignment of a portion of the Term Permit boundary in part to include the sections of land or portions thereof, which are indicated above. By that time, the roadless area boundary had been drawn. The area in question (identified above) does not meet the letter or the spirit of roadless area; the parcels are surrounded by private lands on either two or three sides, and lie at the edge of the existing residential development along the western side of the Carson Valley. The valley's character has changed to a much more urbanized landscape. Many nearby residents use the adjoining National Forest lands for a variety of purposes.

The local Forest Service office has requested that we consider jointly amend the existing Heavenly Ski Resort permit boundary to delete certain lands from the area under permit which are clearly not needed for current or future resort use permit. In cooperation with the Forest Service, Heavenly is considering proposing to add portions of the land identified above to its permit. Adding the lands will not only enhance the mast plan as descried below, but will consolidate lands for management purposes, and will help to offset the potential loss in revenue to the local county government under whose jurisdiction both areas lie.

It appears that the proposed roadless area boundary was simply drawn along the edge of an existing electrical transmission line. There was very little coordination between Heavenly and the Forest Service, thereby, missing an excellent opportunity to share knowledge regarding the master plan and the impacts of this proposal.

Inclusion of these areas within Heavenly's Special Use Permit boundary (i.e., not subject to the proposed Roadless Area rules) would allow a continuous connection to be developed between a potential base area 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.

The ability for the public to access the resort in this manner ensures that the Forest Service and Heavenly will continue to provide a high-quality public outdoor recreational experience, and, that transportation impacts to the existing road network, particularly those on the Kingsbury Grade and in the Lake Tahoe Basin are minimized by providing public access at the bottom of the hill and then transporting visitors onto national forest lands using ropeway forms of transportation.

The opportunity exists for these lands to help meet the expanding recreational needs of the public. Prohibiting future construction or reconstruction of roads will foreclose that recreational opportunity.

Portions of the lands identified above already contain roads which are non-system roads that connect private lands managed for like purposes.

Any new roads which may be constructed to provide access to new skiing facilities are expected to be designated as non-system roads but will be constructed and maintained so as to have minimal environmental impact under the direction of the Forest Service watershed staff using private dollars.

Any new roads which may be planned as a part of the Master Plan process will be subject to full NEPA disclosure and analysis, including the mitigation of any identified impacts to less than significant levels. (Permit Holder, Stateline, NV - #A21708.45617)

**EXCLUDE AREAS WITH EXISTING OR FUTURE OPERATIONS AT FOUR-SEASON RESORTS WITHIN OR ADJACENT TO EXISTING OR FUTURE SPECIAL USE PERMIT BOUNDARIES OF SKI AREAS**

The Forest Service should revise the proposed roadless area rules to clarify that they do not apply to existing or future operations at four-season resorts within existing or future special use permit boundaries. This would have little effect on the conservation of 58.5 million acres of roadless areas

nationwide. It would likely involve only a tiny amount of inventoried roadless areas (many of which are now roaded) and would have a positive effect on the agency's ability to accommodate existing recreation and future increases in demand.

Therefore, in addition to exemptions for fire and other natural hazards and valid existing rights discussed above, Vail Resorts urges the agency to clarify that an exemption from roadless rule prohibitions would be available for operations within current and future special use permit boundaries, one which includes unroaded areas and inventoried roadless areas immediately adjacent to existing ski area sites, particularly where those areas and/or sites are currently allocated to four-season recreation or are under consideration for such allocation by forest plans. In order to avoid the undesirable forecast of higher density recreation at developed recreation sites, ski resorts need the flexibility to improve and expand their offerings in the future. Such an exemption also would acknowledge that lands adjacent to existing ski areas (and perhaps to other developed recreation sites, as well) are already likely impacted to some degree and such existing impacts may be inconsistent with the full range of roadless characteristics and values. The Forest Service should clarify this ambiguity by revising the Final Rule that its prohibitions do not apply to operations within or adjacent to the existing or future special use permit boundaries of ski areas.

Importantly, this appears to be the intent of the Final Rule. Although the January 2001 Final Rule would generally prohibit the construction or reconstruction of roads and the cutting and removal of timber in inventoried roadless areas, the Forest Service stated that the Final Rule does not apply to certain ski area operations. Specifically, the Forest Service stated that:

New ski areas or other activities outside of existing special use permit boundaries that do not require road construction, but require timber harvest, may be allowed in inventoried roadless areas, if approved by the local Responsible Official. (Permit Holder, Avon, CO - #A28852.45600)

#### **EXCLUDE AREAS USED FOR PIPELINE TRANSPORTATION AND OIL AND GAS DEVELOPMENT**

Williston Basin is a natural gas transporter, operating storage fields and over 3000 mile of pipelines throughout its traditional service territory in Montana, Wyoming, North Dakota and South Dakota. Williston has operated a transmission pipeline crossing the Little Missouri National Grasslands in North Dakota since 1930. The original pipeline was replaced and relocated within another corridor several miles north of the original corridor. The Roadless Initiative could prevent pipelines from crossing lands that may indeed be less environmentally sensitive than other potential routes.

Williston Basin is opposed to the Roadless Initiative and urges the Forest Service to reconsider implementing this rule or exempt pipeline transportation and oil and gas development from the Roadless Initiative. By utilizing proven, modern technologies, the development, production and transportation of oil and gas reserves in these areas can be accomplished with only minor and temporary (if any) impacts to the environment. Once a site has been abandoned it is reclaimed to and, in most cases, better than original site conditions. Pipeline rights-of-way generally revegetate within the first and second growing seasons, and by utilizing best management practices soil erosion can be virtually eliminated. (Business, No Address - #A29748.45610)

As a transporter of natural gas in interstate commerce, Williston Basin is dependent upon the oil and gas industry being allowed to explore for gas reserves, develop them and transport the gas on the Williston Basin system. A portion of this gas (gas associated with oil production) is currently being produced and gathered from Forest Service lands within the Little Missouri National Grasslands. Continued use of these lands (and other lands included in the Roadless Initiative) for the production and transportation of the gas is also necessary to ensure any users an ample supply of natural gas and products derived from crude. For example, the Tesoro Refinery in Mandan, North Dakota received all natural gas used for fuel and/or processing from the Williston Basin pipeline. This refinery also receives much of its crude from the grasslands. By eliminating potential new wells and pipeline rights-of-way, continued operation of the refinery is at risk. The local and state economies are very dependent upon the refinery. (Business, No Address - #A29748.45610)

**1358. The Forest Service should exclude certain roadless areas from roadless designation/protection based on geographical location.****EXCLUDE AREAS IN THE WESTERN UNITED STATES**

We are concerned that so much public land in the west is designated as public. A basic concern is that much of that land should be returned to the states. Why should those with larger populations in the East be allowed to rob and keep lands from those on the West? If more wilderness is desired, let all Chicago inhabitants be relocated, and wolves and bears reintroduced in Illinois, while the "wilds" are allowed to take over again as all mankind is kept away. Then let Philadelphia be next, then Atlanta and other parts of the East and South. Go pick on someone else rather than westerners. (Individual, Salt Lake City, UT - #A19191.45341)

**EXCLUDE NATIONAL GRASSLANDS**

North Dakota contains 1.05 million acres of land in the National Forest System. Of these, 266,000 acres are considered inventoried roadless areas. As opposed to much of the land designated roadless in the Forest System, North Dakota's portion is primarily not forested and is instead contained within three National Grasslands.

The greatest concern that I and many others in North Dakota have had with regard to the roadless rule is its application to a wide range of public land without consideration of locale-specific concerns. Roadless rule restrictions were originally designed for implementation on forested land. Placing the National Grasslands under the umbrella of the roadless area initiative ignores the quite significant difference between the landscapes of grasslands and forests. Given that one of the primary purposes of the initial roadless rule was the protection of forested lands for intensified logging, I cannot imagine how the inclusion of grasslands would contribute to this goal.

The inclusion of grasslands in the roadless initiative is further complicated by the comprehensive grasslands management plan proposed for the Dakota Prairie Grasslands as part of the U.S. Forest Service regular review process. The Final Environmental Impact Statement has been recently released, and comments will be taken for six months (up to January 22, 2002) prior to signature of the Record of Decision. While this management plan is still being evaluated and is certainly not perfect, it does reflect a more site-specific approach for public land management. If such plans are to be valid, they must incorporate such local decision-making plans into any national rule-making. (United States Representative, North Dakota - #A23212.45340)

I believe that any rulemaking relating to roadless areas must exclude National Grasslands from applicability of the rule, due to their significant difference from forested lands. Barring an outright exclusion, the local grasslands Management Plan should be considered with implementation of any roadless rule, and special emphasis should be paid to the impact (both economic and social) on local communities from the implementation of roadless restrictions, including loss of revenue and jobs due to mineral extraction restrictions.

I certainly appreciate the considerable work that was done and continues to be done to create a workable initiative, and I recognize the attempt to reduce road maintenance backlog within the agency and focus most on current roads. However, I believe the roadless rule as it currently stands and applies to grasslands is unacceptable. (United States Representative, North Dakota - #A23212.45340)

**1359. The Forest Service should exclude certain roadless areas from roadless designation/protection based on forest plan status.****EXCLUDE AREAS THAT HAVE RECENTLY COMPLETED FOREST MANAGEMENT PLANS**

Our State Society also did not agree that the Roadless Rule should include the Black Hills National Forest because it had just finished a new management plan only a short time before the Roadless Rule process was initiated. We found it inconsistent that the Chief of the Forest Service had signed off and agreed with the management directions of Black Hills National Forest roadless areas only a year earlier. (Professional Society, Rapid City, SD - #A21751.12230)

**Exceptions must be allowed.** Under the interim rule that suspended road building, the agency exempted Northwest Forest Plan (NFP) forests because of the scientific input gathered during the ecosystem management assessment team process (begun in 1993). Scientific analysis of the ecosystem, and related watersheds, led to the issuance of the NFP record of decision, and subsequent revisions to the NFP. This forest planning process was subject to an exhaustive public comment period, and the implementation of the revised NFP led to a new management direction for the forests under the jurisdiction of the NFP. (For every development proposal, the NFP requires a companion strategy for maintaining and enhancing overall watershed health.) The Association believes a new set of guidelines for the protection and management of roadless areas will lead to great disruption in the management of NFP forests. Many of the PNSAA's ski areas are located within NFP forests. For this reason, the Association urges the Agency to exempt the forests covered by the NFP from any future roadless conservation rule. (Permit Holder, Hood River, OR - #A13230.45610)

### **1360. Public Concern: The Forest Service should exclude Alaskan national forests from a national roadless rule.**

#### **BECAUSE INCLUSION OF ALASKA'S NATIONAL FORESTS WOULD BE CONTRARY TO ALASKA STATE AND FEDERAL LAWS**

We strongly oppose the rule, especially its application to the Tongass and Chugach national forests in Alaska. Including the Tongass in the final rule prohibits the Forest Service from complying with the Tongass Timber Reform Act (TTRA) and the Alaska National Interest Lands Conservation Act (ANILCA). (Business, Juneau, AK - #A11824.45613)

Inventoried roadless areas should be evaluated based on a consideration of all the relevant factors. These include the requirement to provide for multiple use of the national forests and the sustained yield of products and services from those forests as required by the Organic Administration Act, the Multiple-Use Sustained Yield Act, and NFMA. They also include factors such as social and economic needs and providing for community stability. With respect to the Tongass, the Forest Service must also consider the Tongass Timber Reform Act (TTRA) requirement that it seek to meet the demand for timber from the Tongass.

The Forest Service should consider that each forest has unique characteristics and that local communities depend on the national forest in varying degrees for their economic, social and environmental health. Application of the present Roadless Rule prohibitions to the Tongass failed to recognize these considerations and is contrary to ANILCA, NFMA, TTRA and the other forest planning laws. (Manager, City of Wrangell, AK - #A17670.45100)

Application of the roadless rule to the national forests in Alaska essentially means no more logging because there has been such limited access into the forest. Timber in areas where roads have been built won't be old enough to harvest for at least 65 more years. Given Sections 708 and 1326 of ANILCA, it is clear that the roadless rule cannot be applied to National Forests in Alaska and that the forest planning process is the only way in which environment, social and economic values can be achieved in a balanced way. (Individual, Sitka, AK - #A12821.45611)

In conclusion, the Forest Service's proposal to eliminate road construction activities in roadless areas on the National Forest System, and to develop regulations for the protection of roadless areas as roadless areas, cannot lawfully be adopted or applied to the Chugach National Forest or Tongass National Forest because the proposal (1) violates existing law with respect to the forest planning process, (2) conflicts with provisions of ANILCA prohibiting wilderness studies and the creation of new conservation systems units, (3) violates the Forest Service's multiple-use mandate by effectively prohibiting resource development in the Chugach and Tongass National Forests, (4) unjustly frustrates value existing rights of access to private inholdings across federal lands administered by the Chugach National Forest, and (5) violates NEPA by failing to adequately and accurately analyze all issues and concerns in the FEIS. The Forest Service should withdraw the proposal or adopt Alternative 1 - No Action (no rule prohibiting

activities in inventoried roadless areas would be issued). (Professional Society, Anchorage, AK - #A21707.45612)

Sealaska determined that the Proposed Rule was inappropriate as a National policy; and specified that it should not be applied to the Tongass and Chugach National Forests.

Our understanding is that effective July 27, 2001 Interim Directive No.: 7710-2001-2 part 7710.4 states "...reserves to the Chief the authority to approve certain proposed road construction or reconstruction projects in inventoried roadless areas until revision of a land and resources management plan or the adoption of a plan amendment that has considered the protection of other management of inventoried roadless areas as defined in FSM 7712.16a." The Tongass NF has been operating under a revised plan since 1997. This plan classified all of the inventoried roadless areas into land uses deemed appropriate by the Regional Forester. The 1997 record of decision is being appealed for many reasons; the most important being ANILCA prohibits nationally directed agency land set-asides. Therefore, the valid planning process must apply to all lands without regard to whether a specific area is roaded or unroaded. (Tribal Corporation, Seattle, WA - #A20468.10130)

**1361. Public Concern: The Forest Service should recognize that it cannot supercede land allocations on the Tongass National Forest with a national roadless rule.**

The Tongass Land and Resource Management Plan (TLMP) just completed an 11-year, \$13 million revision funded by American taxpayers, which is currently under appeal by several entities. In addition to other legal impediments to the application of the roadless proposal on the Tongass, no changes in land allocations on the Tongass can be made by the Forest Service except to correct legal errors in the TLMP revision procedures or pursuant to a forest plan amendment following NFMA procedures. (Tribal Corporation, Anchorage, AK - #A20340.20400)

**1362. Public Concern: The Forest Service should exclude the Alaskan national forests from a national roadless rule.**

**BECAUSE THE TONGASS NATIONAL FOREST HAS JUST REVISED ITS LAND MANAGEMENT PLAN**

The Assembly of the City and Borough of Sitka passed the enclosed Resolution 00-78, A RESOLUTION OF THE CITY AND BOROUGH ASSEMBLY OF SITKA, ALASKA OPPOSING INCLUSION OF THE TONGASS NATIONAL FOREST IN THE U.S. FOREST SERVICE NATIONAL ROADLESS INITIATIVE, POLICY REVIEW AND SUPPORTING ALTERNATIVE T-1, on July 11, 2000.

This resolution was previously submitted to the Forest Service July 14, 2000, with a request to include this official position of the City and Borough of Sitka in the official comments concerning the Roadless Area Conservation Proposed Rule. We want to ensure these comments are also included in any subsequent review of any comments relating to the Roadless Initiative or any related actions.

Per the Resolution, we were pleased the Forest Service has exempted the Tongass National Forest from the interim directives due to its current Revised Tongass Land Management Plan. As the Resolution states, the City and Borough of Sitka supports alternative T-1 and permitting the Tongass to be managed under the Tongass Land Management Plan. (Elected Official, Sitka, AK - #A11819.45613)

It took over 10 years and a lot of hard work to craft the Tongass Land Management Plan (TLMP) finalized in the 1997 Record of Decision. Within that document is a planning process through which Alaskans can participate in making informed and sound decisions to appropriately and responsibly assist the federal government in managing operations within the Tongass Forest.

Our community and our region have, in the past, reasonably relied on the Forest Service's commitment to support a stable, broad-based economy, yet Southeast Alaska's communities have suffered adverse social and economic impacts due to the declining timber supply from the Tongass and other restrictions

on use of the forest. Any further actions must use the TLMP forest planning process to ensure that our economies not experience further degradation.

We respectfully request that the Secretary of Agriculture exclude the Tongass Forest from the national roadless policy in his final decision, and that future roadless issues here be addressed through the processes in the carefully crafted, legally mandated Tongass Land Management Plan. As Governor Knowles wrote in a recent letter: “any unilateral arbitrary federal edict imposing a roadless policy would be a ‘double-cross’ to the integrity of the public process.” (Elected Official, Juneau, AK - #A23218.45613)

Balanced resource management on the Tongass is more closely approximated by the recently completed land management plan revision. The 97 “ROD” contained the compromises and tradeoffs between a full spectrum of interests and represents a good balance for the decade, as intended by NFMA. The 99 ROD circumvented most of the analysis, but is considerably more balanced than the remnants of management that would be imposed by the full adoption of the “Roadless Initiative”. (Individual, Petersburg, AK - #A30209.20200)

The first major concern is based upon our belief that a decision to amend a national forest plan should be made through the regulations in place, mandated by law. Both the 1997 Tongass Land Management Plan (TLMP) and the 1999 amendment by Undersecretary Lyons not only considered the status of roadless lands; they also resulted in a further reduction in potential timber harvest in the Tongass. TLMP was supposed to be the decisional document for management of the Tongass, a fact underscored by Mr. Lyons during his 1999 visit to Alaska when he assured us that the Department’s decision would “finally provide some certainty with regard to future uses and management direction on the Tongass.” The proposed rule runs counter to that intent. (Elected Official, Ketchikan, AK - #A27725.20000)

#### **BECAUSE DECISIONS SHOULD BE MADE THROUGH THE LOCAL FOREST PLANNING PROCESS**

The final Agriculture Department decision on TLMP came in 1999. That decision included additional protection for unroaded, old growth areas along with significant additional restrictions on timber harvest. Though controversial, it appeared to be the culmination of the TLLMP process. However, this year, a federal district court vacated the Agriculture Department’s decision and simultaneously ruled “the Forest Service shall prepare a SEIS [TLMP supplemental environmental impact statement] that evaluates and considers roadless areas within the Tongass for recommendation as potential wilderness areas. The Forest Service must also provide the relative contribution to the National Wilderness Preservation System in its analysis.”

Although the Forest Service has not announced how it will proceed with implementation of the court order, it appears the roadless and wilderness issues will be addressed in the context of the forest plan.

In Alaska, the forest planning process has worked, and can continue to work. In fact, the adaptive management process outlined in TLMP provides the opportunity to adjust forest management based on new scientific information and the information from the cooperative monitoring effort to which the Forest Service committed in TLMP. The State of Alaska sincerely hopes the federal government will allow the forest planning process to work here in Alaska. (State Agency, Juneau, AK - #A23217.45613)

We believe that decisions regarding what to do with the roadless areas and other land use decisions on the national forests, including Alaska’s Tongass, should be made through the local forest planning process which is governed by the rules at 36CFR219 and others. As an example, the second Tongass Land Management Plan was completed in 1997 after ten years of studies, plans, and public input from local and national groups including the state and Alaska native bodies. Many millions of dollars and countless hours of work by men and women in the office and the field went into the development of this plan. Putting the Tongass under the roadless rule nullified all this work. Needless to say, many of the planners and local groups are discouraged that their labors have been spent for nothing. (Professional Society, Juneau, AK - #A11803.45613)

Since I live in Alaska I can not speculate on what is correct for the other 49 states. But I can tell you the Roadless policies do not make sense here in Alaska! Look at an Alaska state map, you will quickly

realize we need more roads and trails, yes even in our parks and national forests. Over 3/4 of our state is not accessible except by boat, snowmobile or dog sled team? Please help get us a ruling allowing state-by-state decisions, allowing local conditions [to] dictate policy. (Individual, North Pole, AK - #A7175.45611)

Please exclude the Tongass from the main “body” of Roadless Rule making, and allow decision on land management to be made at the Forest Planning level, where NFMA intended. (Individual, Petersburg, AK - #A30209.45613)

The State of Alaska urges the Forest Service to affirm the central role and importance of the forest planning process on Alaska’s national forests. Specifically, we urge the Forest Service to make decisions regarding management of Alaska roadless areas through the forest planning process, repeatedly asking for public participation for the Tongass and Chugach National Forests in Alaska, and throughout the national roadless policy discussion finalized last year.

Unfortunately, those calls were not heeded. In January of this year, the State of Alaska filed suit in federal court seeking to stop the application of the national roadless rule to the Tongass and Chugach National Forests.

The Chugach National Forest Plan (CLMP) is very nearly complete following extensive public review. Certainly areas of significant natural value and public interest need protection, such as the Copper River delta and other key fish and wildlife areas. The best course of action is to address such issues in the forest plan, not through the national roadless rule.

On the Tongass National Forest, recent federal court decisions present a unique situation. The Tongass Land Management Plan (TLMP) was completed in 1997 after one of the most comprehensive public reviews and most comprehensive planning processes ever undertaken on a national forest. The State of Alaska’s comments on the draft plan called for adherence to Governor Knowles’ principles of “doing it right”: sound science, prudent and sustainable management, and an open public process that brings all stakeholders to the table. (State Agency, Juneau, AK - #A23217.45613)

When we reviewed the map of the Tongass in your office, it should have been apparent to all present that the Tongass is already well protected by prior federal actions. The Tongass National Forest is 16.9 million acres, of which approximately 6 million acres are forested. 938,000 acres (or about 5.5% of the total and 16% of the forested acreage, is already off limits to commercial timber harvest which of course is what the roadless proposal is intended to further restrict. Furthermore, after the implementation of further restrictions to protect habitat for fish and wildlife (goshawks, marten, deer, and wolves), the 1999 Record of Decision makes a total of 576,000 acres available for timber harvest. As I noted, federal policy has created a dilemma relative to management of the Tongass. The 1999 Record of Decision, with 200 year rotations and other restrictions, forced timber harvesting projected for the next 10 years to move into inventoried roadless areas. Now, the U.S. Forest Service is putting those areas off limits to logging emphasis). . . . Now, ten years after that landmark citizen legislation, the lands protected by the Tongass Timber Reform Act are still standing proud, wild and free. The bear, wolf, salmon, deer and every other creature carry on.” This candid assessment clearly indicates that the 1999 ROD adequately protected the Tongass National Forest.

Thank you for meeting with us last week. In closing, the roadless policy should not be used to further amend TLMP. I believe that the preferred alternative in the draft EIS was correctly identified as the right decision with respect to proper management of the Tongass National Forest. You have the opportunity to protect both the Tongass and the communities of Southeast Alaska by sustaining the forest planning process as the proper way to manage our national forest. (Elected Official, Ketchikan, AK - #A27725.45613)

#### **BECAUSE EXTENSIVE LOCAL FOREST PLANNING HAS BEEN COMPLETED**

You are well aware of the history that has gone into the preparation of the Land Management Plans for both of Alaska’s forests. The last revision to the Tongass was finalized in 1997 and took over six years to write at a cost of \$13 million. The Chugach plan is near adoption after years of input and millions of

dollars in preparation. Both plans thoroughly address the “non-entry” option to guide the agency planners and ensure the public resources are protected. When you first accepted the special role to lead the roadless review for the previous administration neither Alaska forest was scheduled to be included in the roadless policy because current management plans were adopted or soon to be finalized. Bowing to political pressure and a massive letter writing campaign over the next 18 months, the Government was persuaded to include both of Alaska’s forests in the final decision. The decision to include the Tongass and Chugach flies directly in the face of local input and promises made to Governor Knowles and all Alaskans for the past four years. (Association, Juneau, AK - #A879.45612)

Leave the Tongass National Forest out of this roadless plan. Through extensive painful local forest planning the Tongass has done their work and it should be allowed to stand. The lawsuit in progress over the inventoried roadless areas in the TLMP should be thrown out of court because the matter is already decided. Over 60% of the Tongass is already wilderness. Companies have invested millions in helicopters and developed methods to fly timber offshore to barges where no roads are necessary. The very small industry there depends on raw material from these areas. To prohibit timber harvest in the Tongass roadless is to kill that industry. Go to Deer Island in the Wrangle District and look at the helicopter logging taking place there this summer. You cannot even tell the trees are removed. (Business, Portland, OR - #A10558.45613)

Coeur Alaska, Inc., a wholly owned subsidiary of Coeur d’Alene Mines Corporation, strongly disagrees with the Roadless Area Proposed Rule. Likewise, we are opposed to the roadless proposal being extended to the Tongass National Forest. Coeur Alaska has operations within the Tongass National Forest, including patented federal mining claims and associated facilities, exploration and production rights to substantial number of unpatented claims, and a general interest in exploration and mining throughout the northern Tongass Forest. This forest has very recently been the subject of an extensive and costly area-wide planning effort resulting in adoption of the Tongass Land Use Plan. This plan withdrew from development over half of the land in the Tongass. Presently roads disturb less than five percent of the forest, and land available for timber harvest has been reduced to approximately 10 per cent of the Tongass land with commercial forest potential. (Association, Juneau, AK - #A23080.10130)

#### **BECAUSE THE TONGASS LAND MANAGEMENT PLAN IS CURRENTLY UNDER APPEAL**

The Tongass Land and Resource Management Plan (TLMP) just completed an 11-year, \$13 million revision funded by American taxpayers, which is currently under appeal by several entities. In additions to other legal constraints to enactment of the roadless proposal, no changes in land allocations on the Tongass can be made by the Forest Service unless these are to correct legal errors in the TLMP revision procedures or are changes made through a forest plan amendment following NFMA procedures. The single fact that the TLMP is currently under appeal is quite adequate to preclude the Tongass from any consideration under this proposed roadless rule. (Professional Society, Anchorage, AK - #A21707.20200)

#### **BECAUSE THE CHUGACH NATIONAL FOREST IS NOW AT THE STAGE OF RELEASING A FINAL EIS**

The Chugach Land Management Plan Revision has been in process for more than four years and is now at the stage of releasing a FEIS specifically for the Chugach. Many groups and individuals have spent countless hours working with the Inter-Disciplinary Team on the Plan revision process, which has had over 100 public meetings and expended more than \$3 million to date in the revision. As with the Tongass, including the Chugach National Forest in national roadless policy would make a sham of the Forest Service planning process established under NFMA. (Professional Society, Anchorage, AK - #A21707.20200)

#### **BECAUSE THE PROPOSED RULE WAS NOT ADDRESSED IN THE CHUGACH NATIONAL FOREST PLAN REVISION PROCESS**

The proposal cannot be adopted or implemented until such time as it is developed in a manner consistent with the NFMA requirements for amending forest plans. Because this proposal was not addressed in the CNF plan revision process, it should not be implemented on the CNF. (Tribal Corporation, Anchorage, AK - #A20340.20000)

### **1363. Public Concern: The Forest Service should exclude Alaskan national forests from a national roadless rule for environmental reasons.**

#### **BECAUSE ROADLESS VALUES HAVE BEEN MORE THAN ADEQUATELY PROVIDED FOR WITH NON-DEVELOPMENT LAND USE DESIGNATIONS**

Nearly 6.8 million acres of the Tongass National Forest are presently designated as wilderness or Congressional LUD II areas where timber harvest and other activities are prohibited. Only 676,000 acres are classified as suitable for timber management under the 1997 Tongass Land Management Plan. Due to the non-development land use designations and other prescriptions in the 1997 TLMP, at least 90% of the presently unroaded lands in the Tongass will be unroaded at the time of the next land management plan revision. It is the Borough's position that roadless values have been more than adequately provided for on the Tongass and that meaningful consultation with local governments and others that have actual knowledge of local conditions will bear this out. (Elected Official, Ketchikan Borough, AK - #A17476.65241)

Alaska already has enough land that cannot be developed. We currently have 154 million acres locked away in some kind of federal conservation unit or another. To give you an idea of how large that is, consider that Texas is 161 million acres total land area.

The roadless policy makes no sense for Alaska now and it never did. Please do not include Alaska in any roadless policy that you are considering. (Individual, Anchorage, AK - #A15680.45610)

Most of the non-roaded [areas] of both the Tongass and Chugach National Forests are already [under] some form of protection provided either by Congressionally approved non-developed designations or one or more provisions in the Tongass Land Use Plan. [Please] respect the "No More" agreement in ANILCA, and specifically exempt the Tongass and Chugach National Forests in Alaska from any further consideration of roadless protection. (Association, Juneau, AK - #A23080.45612)

Please register my official opposition to the rule as it now stands and my strong support for exempting the Tongass and Chugach from any final national management prescription for roadless areas. A one-size-fits-all national rule does not make sense for either forest, given the fact that both are primarily roadless in a state that contains more than 100 million acres of conservation system units, most of which are also largely roadless. (Individual, Juneau, AK- #A17238.45610)

The Tongass Land Management Plan (TLMP), adopted in April 1999 after many years in process and after the expenditure of large sums of federal funds on environmental and related studies, already excludes 94.5% of the total acreage of the Tongass National Forest from commercial timber harvest. Put it another way, the vast majority of the 5,000,000 acres which have been identified by advocates of additional roadless restrictions are already restricted by being placed in a category which does not allow commercial timber harvest. These facts have been completely ignored by those who advocate that the Tongass be subjected to further restrictions. (Elected Official, Ketchikan, AK - #A27725.20200)

Here are four simple statements from hundreds of facts about land use and timber harvest on the Tongass.

Total acres of Forest available for timber harvest: 676,000 acres

Percent of Forest available for timber harvest: 3 percent

Productive Old-Growth (POG) Forest-wide (1995): 5,060,648 acres

Acres of managed timber stands in timber base: 234,000 acres

To compare us with other national forests in the lower 48 is unfair and shows a bias against the professional work by USFS staff in Alaska. I would urge you to remove the Tongass and Chugach forests from inclusion in the national roadless policy and allow the Land Management do the job they were designed to perform. (Association, Juneau, AK - #A879.45612)

**BECAUSE THE UNIQUE AND ISOLATED TERRAIN PROVIDES INHERENT PROTECTION**

Considering the unique and isolated terrain of the Tongass National Forest, we feel a roadless policy is unnecessary. (Tribal Association, No Address - #A23324.45613)

Despite the demands of non-development interests, it makes little sense to include both the Tongass and Chugach in the roadless rule. Both forests are primarily roadless in a state that has a very limited road system. The policy may make some sense in forests with few roadless areas remaining, but in Alaska it is neither necessary nor appropriate. Under current forest plans, the wild character of both the Tongass and Chugach are adequately protected and preserved. (Organization, Anchorage, AK - #A15542.45612)

The Tongass and Chugach National Forests are unique in the National Forest System. In reality, a very small portion of the Inventoried Roadless Areas will ever be developed because of their inaccessibility. Many of these areas are already protected under wilderness, remote recreation, Wild and Scenic River, or old growth reserve status. There are very few private inholdings and access to them is adequately addressed under ANILCA. We simply do not need another layer of "protection" administered at the national level. (Elected Official, Petersburg, AK - #A23084.45613)

**1364. Public Concern: The Forest Service should exclude Alaskan national forests from a national roadless rule for forest health reasons.**

There are a very vocal minority of residents in Southeastern [Alaska] who are on a "crusade" to eliminate any prospects for forest management. Many of these people have not lived and worked on the forest for very long. Yet these folks have been very effective in extending support for their radical cause.

Roadless on the Tongass is a VERY RADICAL proposal. This contrasts greatly with most lower 48 forests, where the initiative mainly reinforces many de-facto actions already consciously not taken. I read comments to a couple Wisconsin papers describing the merits of the proposal to protect the 60,000 acres of the Chequamegon (out of about 1,600,000 acres). This is a very minor effect on Wisconsin, yet the article devoted more space to the Tongass than the local forest. They essentially extended their view of the merits for the proposal on "their" forest, to "our" forest. Having spent some time there, I can understand the merits to "their" forest. Yet they obviously had no information or experience with which to judge the effects on "our" forest other than their conjectures.

Here, "full" roadless implementation may even close access to lands already harvested and in need of silvicultural treatment to maintain resource values, especially for wildlife habitat. The "anti-timber industry crusaders" tend to refer to lands already accessed by roads or having had timber harvest as though the land no longer existed. (Individual, Petersburg, AK - #A30209.45613)

The inventoried Roadless areas on the Tongass and Chugach National Forests have different vegetation cover types, stand conditions, fire, insect and disease risk values and different proximity to communities. The NFMA mandated that a forestland management planning process include the assessment of values, risks, protection and management options for each Roadless area. This assessment should provide the basis for determining what management options will best provide for healthy forests and include the option of a recommendation to Congress for Wilderness Area Classification. Areas not recommended for Wilderness Area Classification should not remain in a "Roadless category," but be managed to promote healthy forests under appropriate management prescription in the forest plan. The over one million acres of spruce bark beetle infested forest in South Central Alaska includes National Forest Roadless areas where insect control, salvage and rehabilitation prescriptions were appropriate, but blocked by special interest groups. Healthy forest management includes a variety of tools to maintain the vigor of the forest, among which include forest health. Just arbitrarily putting areas into Roadless status compromises the ability to use this tool. (Association, Ketchikan, AK - #A28980.30100)

**FIRE HAZARD REDUCTION**

We feel strongly that the process used to create the roadless rule was deeply flawed, forged by politics rather than professional reasoning, and in direct conflict with several federal laws. A single, one-size-fits-all rule that affects roadless areas across the entire national forest system cannot possibly address

conditions unique to each roadless area within each forest. For instance, national forests in Alaska were not analyzed for fire risk because “of the low fire hazard and fire occurrence associated with their temperate rain forests” (p. 3-409 Roadless Area Conservation FEIS). The FEIS failed to recognize the risk of fire within the CNF, which has been the subject of arguably the largest spruce bark beetle epidemic in recorded history and has killed more than 95,000 acres of white and lutz spruce stands on the CNF. The Forest Service spent \$2.8 million in 2001 battling a single 3,260 acre out-of-control prescribed burn in this area of “low fire hazard.” (Tribal Corporation, Anchorage, AK - #A20340.10120)

The Chugach National Forest is presently suffering from a pandemic of spruce bark beetles which has devastated more than 95,000 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 uninventoried) 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. (Professional Society, Anchorage, AK - #A21707.45612)

The FEIS, in its analysis of unique characteristics in Alaska, essentially ignored the 5.5 million-acre [Chugach National Forest] CNF. The CNF, with an astonishing 98.9% of its land base classified as roadless, is impacted by the proposed rule to a far greater extent than any other national forest in the nation, yet the effect of the roadless rule on the CNF, its users and land owners such as Chugach, who depend on it for access to their lands, was allocated only a cursory analysis in the FEIS. The roadless rule, as it is presently written, effectively eliminates the ability of land managers to maintain forest health and provide for future multiple-use opportunities on the CNF. The fact that ANILCA issues on the CNF were not even addressed further shows the abysmal failure of the roadless FEIS to identify critical local issues unique to each national forest. (Tribal Corporation, Anchorage, AK - #A20340.10131)

The FEIS failed to recognize the risk of fire within the CNF [Chugach National Forest], which has been the subject of arguably the largest spruce bark beetle epidemic in recorded history and has killed more than 95,000 acres of white and lutz spruce stands on the CNF. The Forest Service spent \$2.8 million in 2001 battling a single 3,260 acre out-of-control prescribed burn in this area of “low fire hazard”. The roadless rule effectively eliminates the ability of land managers to maintain forest health and provide for future multiple use opportunities on the CNF. (Professional Society, Anchorage, AK - #A21707.20207)

### **1365. Public Concern: The Forest Service should exclude Alaskan national forests from a national roadless rule.**

#### **BECAUSE THEY SHOULD BE MANAGED FOR TRADITIONAL MULTIPLE USE**

Approximately 98 percent of the Chugach National Forest would remain roadless under the new rule. The rule would prevent the Forest Service from providing additional access, whether for resource extraction, forest health, recreation or tourism, despite future needs. It is vital that both the Tongass and Chugach be managed for multiple uses, especially in Alaska where 85 percent of the nation’s national wildlife refuge lands are located, as well as 70 percent of its national park lands. These units, like most of Alaska, are primarily roadless and wild. (Organization, Anchorage, AK - #A15542.50100)

I am opposed to designating the Chugach National Forest as roadless. The Chugach was set aside to provide timber, water, minerals, fisheries and recreation to be managed under multiple-use. To close the Forest to vehicle use will severely limit management prerogatives. It will also limit public ingress and egress on the forest lands.

The natural land forms on the Chugach will limit vehicle use naturally without additional legislation or designation. This Forest is not a National Park and should not be managed as such. The personnel of the

Forest should be staffed with competent foresters and trained land managers who understand vegetative growth and other competing uses to provide continuing resources uses in perpetuity.

I do not want the Chugach or Other large areas of the National Forest System to be closed off to a large segment of the public or restricted to a single use. (Individual, Eagle River, AK- #A25956.45612)

### **1366. Public Concern: The Forest Service should exclude Alaskan national forests from a national roadless rule for economic reasons.**

#### **BECAUSE ROADLESS AREAS MUST BE AVAILABLE TO PROVIDE FOR THE BASIC INFRASTRUCTURE NEEDS OF THE REGION**

The present Roadless Rule impacts the Southeast Alaska Electrical Intertie Project, the Southeast Alaska Transportation Plan, and the Bradfield Canal Road, which would provide a much needed link to Canada and the U.S. mainland. On the Tongass, roadless areas must be available to provide for the basic infrastructure needs of the region such as roads for transportation and electric power transmission lines. Access to roadless areas is needed for timber harvesting and mineral extraction. (Manager, City of Wrangell, AK - #A17670.45613)

The Tongass is largely undeveloped, and inventoried roadless areas must be available to provide for the basic infrastructure needs of the region such as roads for transportation and electric power transmission lines. On the Tongass, areas within inventoried roadless areas must also be available for timber harvesting and mineral extraction. If not, the economic decline and attendant social problems experienced by the region because of increasing restrictions on the use of the forest and the decline in the timber supply from the Tongass will continue and worsen. (Elected Official, Ketchikan Borough, AK - #A17476.45613)

Roadless areas must be created with a purpose, the importance of which does not warrant Congressional designation. In the Tongass and Chugach National Forests a significant part of the land area under Federal jurisdiction has not been roaded or harvested. Designation of these areas as roadless would create administratively designated wilderness areas. In the Tongass and Chugach National Forests this action is contrary to ANILCA, which stipulates that there shall not be more studies of lands that could place them in a de facto wilderness status. Therefore, the planning effort should not impose roadless designation or preclude land access to Alaska communities, constrain opportunities to develop municipal water supplies, hydroelectric sites, sand and gravel extraction, transportation corridors and other attributes required for community commerce and development. (Tribal Corporation, Seattle, WA - #A20468.20207)

Transportation and utilities are key to the long-term viability of any economy and it takes an economy of critical mass in order to maintain an environmentally sound infrastructure. By restricting transportation and utility corridors, the policy limits the economies of Southeast. (Business, Juneau, AK - #A11824.75700)

The Tongass National Forest dominates the economy of Southeast Alaska. It surrounds all of our towns and villages many of which are predominately Native communities. Forest Service decisions regarding roadless policy can isolate the communities from each other, preclude the communities from benefiting from regional electrical intertie systems, development of safe water supply and many forms of recreation. (Tribal Corporation, Seattle, WA - #A20468.75300)

AELP, through its corporate affiliate, Lake Dorothy Hydroelectric, Inc. (LDHI), plans to construct the Lake Dorothy Hydroelectric Project in electric consumers located within the CBJ. In order to construct and operate Lake Dorothy, it will be necessary to construct a road from tidewater to Bart Lake, more or less paralleling the proposed penstock. Heavy equipment will be required to construct the transmission line from the Lake Dorothy powerhouse linking it with AELP transmission grid. It is AELP's

understanding, that the Roadless Policy now in effect, but now under review, will not allow the construction and operation of Lake Dorothy.

The proposed Lake Dorothy Hydroelectric Project is located on the east side of Take Inlet within the Tongass National Forest. It is within an area classified by the U.S. Geological Survey as a Power Site Classification (No. 238; established June 5, 1930). This classification recognizes the potential of the area for electrical generation and requires management of the area in compliance with Section 24 of the Federal Power Act. When the U.S. Forest Service's Tongass Land Resources and Management Plan (TLRMP) was approved this area was specified as a Transportation and Utility System Land Use Designation (TUS) to provide for the construction of the Lake Dorothy Hydroelectric Project as well as a transmission line connection with the existing transmission grid. If Lake Dorothy cannot be constructed, the alternative is to satisfy the electric energy deficit with diesel fueled engines and turbines. The use of diesel fuel has become more and more unpalatable due to air contamination, risk of spills and cost. Lake Dorothy is the next logical addition for the generation facilities owned by AELP.

It is AELP's understanding that the existing Roadless Policy will also block construction of the Southeast Electrical Intertie. The Intertie will link all of the Southeast Alaska electrically and make it so communities now dependent on diesel generation to instead purchase non-polluting hydroelectric energy from proposed projects such as Lake Dorothy.

AELP urges the United States Forest Service to allow the construction and use of roads within the Tongass National Forest in order to permit construction of the Lake Dorothy Hydroelectric Project, other hydroelectric projects and electrical interties within the Tongass National Forest. (Association, Juneau, AK - #A3023.91610)

#### **BECAUSE COMMUNITIES DEPEND ON THE TONGASS NATIONAL FOREST**

Of the 17 million acre Tongass National Forest, approximately 6.8 million acres are Congressionally designated wilderness or LUD II areas where resource development and other activities are either prohibited or restricted. Under the 1997 TLMP, at least 90% of the unroaded areas of the Tongass will remain unroaded when that plan is revised. On the Tongass, roadless values are already more than adequately protected, and no further protection is needed. Besides being illegal, it is simply irrational to apply a national-level prohibition on road building to the Tongass. Doing so will only serve to send Wrangell and its residents further down the economic spiral they are struggling against due to the decreased supply of timber from the Tongass and other restrictions on the use of the forest by those who depend on it the most. (Manager, City of Wrangell, AK - #A17670.45613)

The Roadless Policy significantly limits potential futures for the people of the Tongass. Unlike the residents of the lower 48, the communities of the Tongass are pockets of State and private land surrounded by the United States, Canada and the Pacific Ocean. The Roadless Policy preserves the accomplishment of the environmental groups to significantly reduce human habitation of the Tongass, and limits those remaining human's potential sources of income, transportation and basic infrastructure.

Transportation and utilities is key to the long-term viability of any economy and it takes an economy of critical mass in order to maintain an environmentally sound infrastructure. By eliminating transportation and utility corridors, the policy limits the economies of Southeast to where they are or less.

Southeast Alaska is dependent on the income generated by the Tongass National Forest. Income is derived from the fish, timber, mineral and tourism industries. Those industries support the basic infrastructure includes the water and sewer systems, electricity, roads, ferries, phones, healthcare and local government. The people of Southeast Alaska deserve the right to develop their communities and build a future for their children, it should not be dictated to them by the Sierra Club.

Without the income derived from the natural resources of the Tongass, communities will not be able to maintain their current infrastructure, let alone improve it. The harvest of the natural resources creates the critical mass of the economy. That harvest allows the economies of Southeast to grow, mature and build infrastructure to support exportable services for income.

First the long-term timber contracts were voided, in what appears to be a violation of Federal laws. Then the Tongass Land Management Plan, an exhaustive exercise in killing the timber industry by environmentalist and the former Secretary of Interior was passed.

Finally the Tongass was thrown in at the last minute to this Roadless Policy without regard to the long-term impacts of the people and communities of the Tongass.

Yes, the Roadless policy successfully eliminates the opportunities for the people and communities to exist in Southeast Alaska. Is that goal of the Federal Government? Eliminate human habitation in Southeast Alaska! Without a viable economy of critical mass, those remaining people will have a greater negative impact on the Tongass than larger, more diverse economy. Sewage systems will be too expensive and the disposal will revert back to running into the sea. Water systems will deteriorate and not be replaced. Healthcare will decline, and folks will have to fly to Seattle or Anchorage, but that means Coast Guard will be flying more emergency runs because commercial air transportation will not be available. As most economies are pyramids, remove the foundation which is the source of income; everything else will implode unto itself. (Richard Jackson, President, Alaska Native Brotherhood, No Address - #A15742.45613)

#### **TO PROTECT THE TIMBER JOB BASE**

The Tongass National Forest has been managed over the past ten years to achieve the agenda put forward by the environmental industry. This has already resulted in a massive reduction of the lands available for development and maintenance of an economic base. The Tongass timber program was established in the 1950s to create an economic base that provided year round employment for the citizens of Southeast Alaska. However, because of the changes in the management of the Tongass over the last ten years, much of Southeast Alaska has returned to an economy based on seasonal employment. The tourist industry provides only a few months of work per season. The fishing industry is also seasonal with a large portion of the fleet coming in for the fishing season only and therefore limiting their contribution to the economy. The timber industry has been reduced to the point that there remains only a few hundred year-round jobs out of the thousands that existed when the land base was large enough to provide the raw material for a significant forest products industry. (Association, Ketchikan, AK - #A20443.75310)

At a meeting of Southeast Alaska mayors (as well as in a personal conversation with me) in Sitka last year, Undersecretary of Agriculture Jim Lyons assured us that, based upon his record of decision on TLMP, there would be a timber harvest sufficient to operate existing and projected timber-related businesses in our communities. Additional restrictions in the Tongass National Forest, which would clearly result by inclusion of the Tongass, would contradict the statements made by Mr. Lyons. (Elected Official, Ketchikan, AK - #A27725.45613)

Most Southeast Alaska local communities have developed their economic base by using the resources available from the Tongass. Over the past 5-10 years the Tongass land base available for development has been reduced to the level that it is no longer possible to provide timber and other resources necessary to maintain a viable economic base. In evaluating the Tongass roadless areas, this issue must be viewed as the major difference between the effects of the roadless rule in other National Forests. We currently have over 90% of the forest in non-use categories. It is now time to review the few remaining areas in terms of maximization of commodity production rather than further restrictions. Wilderness is a single use category. In order to provide a balance, the remaining areas in Alaska must remain available for resource development so that the dependent communities have the resources necessary for maintenance of their economic base. (Association, Ketchikan, AK - #A20443.75510)

The potential timber products industry in South Central Alaska (the Chugach National Forest) has not had a chance to develop because of the lack of a viable supply of timber. The release of a draft plan that has no ASQ is not going to encourage investment or job creation in the area. This must be changed in the final plan and that plan must not be invalidated by implementation of a roadless rule. (Association, Ketchikan, AK - #A20443.75510)

The basic economy of southeast Alaska relies very heavily on natural resource development. Enormous land withdrawals from the timber base have driven down timber harvest levels and resulted in a severe reduction in the regional economic base. On the Tongass, only 7% of the original timber base is left

from which to provide the timber and other resources necessary to support the southeast Alaska economy. A similar situation holds for the Chugach as well. There is no ASQ in the draft land management plan for the Chugach, yet there are several mills that could be running viable operations if a reliable timber base existed. (Association, Ketchikan, AK - #A20443.75510)

## Use of Existing Forest Plan Designations

### Summary

A number of respondents believe that wilderness and roadless designations need not be a mutually exclusive choice, and some suggest applying existing forest plan designations as appropriate. Some respondents suggest using categories that minimize human impacts and preserve the unroaded character of these areas. Others ask that any areas that do not meet wilderness recommendation criteria be allocated to these types of categories. Some mention specific categories that they say are most appropriate, such as backcountry non-motorized, both winter and summer. Others specifically ask that the Forest Service rule out certain management categories for roadless areas, such as summer motorized, matrix, general forest, or any category that permits roadbuilding. Some state that individual forest plans should simply choose categories that are consistent with a national rule.

Others state that the Forest Service should reject both increased wilderness recommendations and roadless designation alike. Instead, some ask that existing management categories be used. These respondents request that the Forest Service apply categories that allow more intensive uses, especially motorized vehicle travel.

### **1367. Public Concern: The Forest Service should use appropriate existing management categories to protect roadless qualities.**

#### **RECOMMEND QUALIFYING AREAS FOR WILDERNESS AND ALLOCATE THE REST TO FOREST PLAN CATEGORIES THAT PRESERVE ROADLESS CHARACTER**

IRAs which are not designated as wilderness should remain in some form of local Forest Plan allocation that preserves the spirit and intent of management direction of the RACR. (Individual, Lyons, OR - #A13491.25300)

We think both; that is, of those roadless areas selected to remain roadless, some should be recommended for wilderness and some should be put in a management prescription, like semi-primitive non-motorized, to protect them. This also is a decision to be made in the forest planning process. A few areas may warrant proposed wilderness status. Most will be placed in an unroaded prescription. Either way, the public will point the direction for that split. It will then be up to Congress to decide if a recommended wilderness warrants that protection. (Organization, Saint Anthony, ID - #A13225.25000)

In general, ATC strongly supports land-management designations, including Wilderness, that limit those incompatible developments and activities and provide additional protection to the Appalachian Trail corridor. The Trail crosses 66 such areas and comes within 0.5 miles of 50 additional areas that are managed in a roadless condition. There are undoubtedly other areas that have similar characteristics but are not currently managed in this manner. (Organization, Harpers Ferry, WV - #A21737.25000)

#### **DESIGNATE ROADLESS AREAS AS BACKCOUNTRY NON-MOTORIZED**

The Forest Service must—both by law and regulation—analyze remaining roadless areas for additional protections within the framework of their forest plan revision. Many of these have high quality, low elevation wilderness potential, or should be managed for backcountry non-motorized recreation to restore balance between motorized recreation and quiet use recreation. This is particularly important

because of the increasing pressure to extend motorized recreation for OHV trails, used only by a tiny minority of forest visitors, ever farther into de facto non-motorized areas. (Organization, Denver, CO - #A8824.25330)

Roadless lands having wilderness characteristics should definitely be considered for wilderness classification. Other roadless areas could be maintained under a specific designation for roadless area management under the forest plans if they are managed to remain roadless, undeveloped and have a semi-primitive, non-motorized recreation emphasis. (Individual, Bozeman, MT - #A8818.25000)

#### **DESIGNATE ROADLESS AREAS AS BACKCOUNTRY WINTER NON-MOTORIZED**

There are definitely areas that should have special designations assigned. This document should not be the deciding factor for them. Backcountry skiing, snowshoeing and other non-motorized winter activities must also be given designated areas. (Individual, Kemmerer, WY - #A8383.25350)

#### **DO NOT ALLOCATE TO CATEGORIES THAT ALLOW SUMMER MOTORIZED USE**

The mechanics of roadless area protection—i.e. what land management designations will be used—should be considered on a cases-by case basis in the local planning process. In some instances recommendations for Wilderness status, or designations to MA 6.2 or 8.1 (Scenic Areas) might be appropriate. Any existing snowmobile access routes in the inventoried roadless areas should be preserved, but ATV usage should not be allowed on these lands. (continuing the current policy). (Individual, Lincoln, NH - #A5640.25000)

#### **DO NOT ALLOW INVENTORIED ROADLESS AREAS TO BE DESIGNATED MATRIX OR GENERAL FOREST**

Local Forest Plans should not be allowed to establish blanket designation of IRA to “General Forest” or “Matrix” allocations. (Individual, Lyons, OR - #A13491.25330)

### **1368. Public Concern: The Forest Service should allow individual forests to allocate roadless areas to any management prescriptions that are consistent with a national roadless rule.**

#### **CREATE OR MODIFY PRESCRIPTIONS IF NEEDED**

Individual forests should be allowed to designate roadless areas into management categories consistent with their existing land allocation structure, as long as such designations provide the level of protection required by the national rule. In no such management designation exists that is consistent with the national rule, one must be created or modified. (Organization, Boston, MA - #A23083.25100)

NFMA requires all forest plans to evaluate wilderness potential of all roadless areas and make recommendations concerning wilderness designation to Congress. Conservation of Inventoried Roadless Areas would not affect this provision of NFMA. This rule would most likely do neither of the 2 options given in Question 8. Forests already have designated lands for roadless area management. This rule should simply direct Forests to prohibit road building and logging in Inventoried Roadless Areas. If individual Forests find these areas sufficient for wilderness designation, the existing procedures can be enacted as under NFMA. (Organization, Tucson, AZ - #A21813.25110)

### **1369. Public Concern: The Forest Service should assign roadless areas to the most protective designation possible.**

Should inventoried roadless areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation, or should they be maintained under a specific designation for roadless area management under the forest plan?

Whichever protects them from development better and will be passed. I'm not familiar with the legal differences between these designations, but I expect Congress would not pass this. (Too many big-business interest and short-term thinking, if any at all. (Individual, Arlington, MA - #A1152.25000)

Whatever designation has the best chance of keeping the roadless areas roadless and the wilderness wild despite changes in political administrations and their policies is the most desirable. (Individual, Anchorage, AK - #A518.25120)

I am less-versed in the differences between wilderness designation and the forest plan. In either case, the best interest of the ecosystem should be the ultimate goal, with political bureaucratic [considerations] secondary to the needs of the environment. (Individual, No Address - #A22265.25000)

#### **THAT WILL PREVENT ROAD BUILDING**

Roadless areas should be maintained under whatever designation is most likely to prevent road-building. If roadless areas are “lumped together” with areas that have roads, then they are less likely to be protected. Roadless areas need special protections that are not afforded to other areas, and whatever category they are ultimately placed in should cause road-building to be an extremely difficult proposition, if not impossible. (Individual, Columbus, OH - #A659.25000)

### **1370. Public Concern: The Forest Service should assign roadless areas to the category that will ensure protection as quickly and easily as possible.**

[Q8] Whichever method is the LEAST complex, time-consuming, and difficult to accomplish to achieve protection for roadless areas. (This is one of the questions which confuses me; I am not an expert on Federal policy-making). I would guess that attaining Congressional designation for roadless areas would be more difficult than designating it through the forest plan. (Individual, Cumming, GA - #A21156.25000)

### **1371. Public Concern: The Forest Service should assign roadless areas to a modified National Conservation Area prescription.**

#### **WITH TEETH TO RESTRICT RESOURCE EXTRACTION AND DEVELOPMENT**

An alternative to Roadless Area designation may be to modify the current National Conservation Area guidelines. Empower the National Conservation Areas with the authority to protect the resource from development and resource extraction, while allowing the current recreational activities to continue. Currently neither the National Conservation Area nor the National Recreation Area designations have the teeth to protect the land resource from development or resource extraction. (Individual, No Address - #A22297.25350)

## **Other New Management Categories**

### **Summary**

Several respondents suggest that the Forest Service create other new management categories rather than a specific roadless designation. Several groups suggest that the Forest Service revisit the “primitive area” concept of Bob Marshall and update it to create a Backcountry Recreation Area category. Those who recommend this category state that it will allow recreational activities that are prohibited in wilderness areas, while still preventing commodity use in roadless areas. They suggest that this would go a long way toward reducing conflict between various user groups over a national roadless rule by meeting the needs of a broad range of recreationists while still maintaining the primitive nature of these areas.

**1372. Public Concern: The Forest Service should classify roadless areas as recreation areas.****ALLOW RECREATIONAL ACTIVITIES BUT NO RESOURCE EXTRACTION**

At a bare minimum, every remaining scrap of roadless area should be considered seriously for Wilderness Area designation, under the 1964 act. Many ought to receive National Monument or Park status. Some won't pass muster, of course: these should be classified as Recreation Areas (the only designation that allows motorized use, while still giving wildlife and flora a fighting chance). (Individual, No Address - #A49.25210)

I do not favor additional wilderness designations of IRAs selected for future roadless protection. I feel wilderness too strict a designation. I favor a new type of designation if protection is needed from resource extraction—call it a “wild lands protection area” or name of your own choosing. In such a designated area, all forms of recreation are permitted but not resource extraction. The only logging permitted is to maintain forest health. (Individual, Palmer Lake, CO - #A22106.25300)

**1373. Public Concern: The Forest Service should manage roadless areas as backcountry recreation areas.**

“Backcountry” designation has been bantered around for years and rejected by the “all-or-nothing” timber industry and environmental organizations. But most of us who live near and play in the National Forests realize that wilderness or full development are not the only choices. Now is the time to dust this important concept off and make it a reality. Years ago the agency led the nation by designating several “Primitive Areas” under Bob Marshall’s guidance. Eventually Congress made the pioneering concept permanent with the Wilderness Act of 1964. This is an opportune time for the agency to again demonstrate leadership with a backcountry designation and show what it can do with professional management. (Organization, No Address - #A8227.25300)

We believe these areas should not be named “roadless areas” as part of the ongoing forest land use planning by the US Forest Service. Because, these same areas include thousands of miles of “roads,” trails and ways, which are an important forest infrastructure and public asset. We believe a more appropriate name to assign these areas for forest planning designation is “Back Country Recreation Area.”

The Back Country Recreation Area (BCRA) designation should be designed to provide reasonable protection of our natural resources and at the same time enhance the backcountry recreation opportunities. All “roadless” federal lands, not currently designated as Wilderness, should be reviewed for their importance to backcountry recreationists and considered for designation as BCRA's within the next 2 years. We need a designation that encourages cooperation, not only between diverse recreation interests, but between recreationists and the need for fire protection, forest health and wildlife concerns. The BCRA can be that designation. (Individual, No Address - #A1709.25300)

During my 42 years as a FS employee, I have always had a keen interest in wilderness and roadless areas. It has long been my opinion that we need a third category such as “back country.” Many areas of the National Forests should be left relatively undisturbed, but without all the restrictions and politics of wilderness designation. (Individual, No Address - #A722.25300)

The anti-access groups scored a huge win when the previous administration pushed the highly flawed and questionably illegal Roadless Management Plan through. One of the reasons this was so important is the fact that now they can call an area “roadless” that indeed has many existing roads going through it.

When we brought this fact up in the Forest Service roadless scoping meetings, we were assured that if existing roads and trails were in “roadless areas”, these roads would remain open as before the ruling. We have already seen lawsuits trying to stop some of the planned routes in the ATV Jamboree because they are in “roadless areas”. Do you see where the problem lies and the advantage anti-access groups

have in calling areas “roadless” that are not? People across the country will now support shutting down these roads because surely there shouldn’t be roads in “roadless” areas.

If an area has classified or unclassified roads or trails that have been in existence for many years with people driving on them, how can it be classified as roadless? I would respectfully suggest totally re-inventorying them with the help of the local people and user groups that know these areas, then renaming them “backcountry” areas. (Organization, Richfield, UT - #A20428.45514)

I believe these areas should not be named “roadless areas” as part of the ongoing forest land use planning by the US Forest Service because, these same areas include thousands of miles of “roads”, trails and ways, which are an important forest infrastructure and public asset. They are, in fact, NOT roadless at all! I believe a more appropriate name to assign these areas for forest planning designation would be “Back Country Recreation Area”. (Individual, Livermore, CA - #A23445.45514)

#### **TO PROVIDE A RANGE OF RECREATIONAL ACTIVITIES THAT ARE PROHIBITED IN WILDERNESS**

Some roadless areas are definite candidates for wilderness, others are important backcountry recreation areas where activities prohibited in wilderness are allowed (large groups, hut systems, mountain biking, snowmobiling). Since the public is never assured that non-designated areas will be managed forever as backcountry, perhaps it is time to resurrect Bob Marshall’s idea for congressionally designated backcountry. (Individual, Jackson, WY - #A10527.25300)

#### **TO PROVIDE MOTORIZED RECREATION OPPORTUNITIES**

I would like to see the lands currently under study as roadless, to be managed as the Blue Ribbon Coalition proposed **backcountry** designation and left open for motorized and other types of recreational use. (Individual, White Salmon, WA - #A700.25300)

I urge you to scrap the Clinton roadless policy and replace it with a more user friendly multiple use policy, such as the “backcountry” proposal from the Blue Ribbon Coalition. There is room for common sense use and protection without locking out any particular user group. (Individual, Colorado Springs, CO - #A720.25300)

## Agency Organization and Funding

This section includes three subsections: Agency Organization, Agency Funding, and Monitoring/Enforcement.

### Agency Organization

#### Summary

**General Comments** – One respondent suggests that the Forest Service should restructure its organization to focus on ecosystem values rather than commodity production. Another individual suggests that the forests “should provide inspection and oversight of district administrative and management functions.”

**Forest Service Personnel/Training** – Some respondents comment about the education and activities of Forest Service personnel. Several suggest that the Forest Service should employ staff trained in all forest uses, while others state that the Forest Service should employ staff trained in multiple use management or the “new disciplines.” One group suggests that the Forest Service improve screening during hiring of personnel for education and experience. Other individuals focus personnel comments on educating existing employees. These respondents suggest educating personnel in conservation biology, to implement laws, to manage timber removal and transportation, to protect communities, and to effectively communicate and work with the public. Additionally, a number of writers comment about agency interactions with employees. Some suggestions include providing adequate staff and resources in the field; halting downsizing efforts; allowing local personnel to perform their duties; allowing employees to voice their views without fear of recrimination; and reducing the paperwork required of personnel.

#### *Agency Organization General*

#### **1374. Public Concern: The Forest Service should restructure itself to focus on ecosystem values rather than commodity production.**

Until the USFS is restructured to clear out old school, commodity oriented personnel, acquires expertise in social sciences and nonmarket social values, and replaces commodity production with ecosystem integrity and sustainability as its primary focus, I will not hold much hope that it will be genuinely committed to management of roadless areas within forest plans for non-commodity values. (Individual, Corvallis, OR - #A650.17300)

#### **1375. Public Concern: The Forest Service should allow forests to provide inspection and oversight of district administrative and management functions.**

##### **AND DEVELOP AND DISPERSE BUDGETS**

The forests should provide inspection and oversight of District’s administrative and management functions and develop and disperse budgets. (Individual, No Address - #A26264.13200)

## *Forest Service Personnel/Training*

### **1376. Public Concern: The Forest Service should employ staff trained in all forest uses.**

In regards to good or appropriate forest management, how can this occur when there are not practicing timber foresters on the local staffs? All conservation practices are essential in good forest management. Also, each forest has to be addressed separately, just like the expression “one size does not fit all” forest management is no exception—each forest is different and must be handled as such. Staffing for all forest uses is a must. The multiple-use concept is a sound one and one that must be kept in use. Long-term non-use is not a good conservation practice. (Conservation District, Sublette County, WY - #A28888.30100)

### **1377. Public Concern: The Forest Service should improve screening of personnel for education and experience.**

Employing people in the Forest Service from very diverse areas has produced abundant, often deep conflicts within the organization and some of these have increased the apparent public/agency conflicts. Improved screening for appropriate education and experience will benefit the Service and the nation. Failure to provide employment stability and to allow loss of experienced staff has been costly and has resulted in major conflicts. Both improved employment and retention of superior staff will improve the Service and reduce conflicts. (Civic Group, Roanoke, VA - #A1713.15164)

### **1378. Public Concern: The Forest Service should require local personnel to have at least 10 years experience on the forest before granting them decisionmaking authority.**

The appropriate role of the local forest planning is to have personnel with numerous years of experience in that particular forest system to create a plan, which maximizes recreational opportunities while keeping the forest in an overall healthy condition. Every forest and its needs are different and for this reason only a person who has spent at least ten (10) years exploring and studying a forest can know the proper manner in which to manage that forest. Decisions cannot be made by someone in Washington D.C. or a state’s capital . . . or by the recently transferred heads to local forests who have no real knowledge of the forest they have been assigned to. The key is having personnel with forest experience not political experience manage these resources. (Individual, Columbia Falls, MT - #A29651.13100)

### **1379. Public Concern: The Forest Service should employ scientific-minded managers.**

#### **IN ORDER TO PROVIDE MULTIPLE USE MANAGEMENT**

Proper forest management should be and can be accomplished by employing sensible, scientific-minded managers. What I have observed more and more over the past decade or so is that the Forest Service has tended to hire and employ people that have a strong individual leaning toward preservation. I could and will provide several examples of this if you wish. If you employ the wrong person, then poor management results. Change your criteria and philosophy to a more sensible multiple-use management and improvement in the forest lands will result. Use good and real science not politically driven, agenda-oriented “science.” (Individual, Elko, NV - #A23650.30100)

### **1380. Public Concern: The Forest Service should encourage professionals trained in the new disciplines to join the Agency.**

Remember that public trust in forest management is very low. The forest service has been promising everything to everybody and this strategy has been a failure. Closed management where public oversight is forbidden and where extraordinary environmental damage is occurring, like livestock grazing, is only working to the detriment of the agency. Encourage professionals trained in the new disciplines to join

the agency and actively seek ways to work collaboratively with willing participants. (Union, No Address - #A8392.12230)

### **1381. Public Concern: The Forest Service should educate personnel.**

All those who participate in the process of decision making should be educated in the relative administration rules, attend public meetings, ask questions about that which is not understood and most importantly comply with environmental statutes. Those statutes regarding endangered species and environmental impacts including logging practices, timing of harvest, suitability of land for timber production and timber removal prescriptions. (Union, No Address - #A17699.15163)

#### **IN PRINCIPLES OF CONSERVATION BIOLOGY**

The Forest Service should consider the protection of the nation's biological heritage as its paramount value in addressing roadless areas. Forest Service managers and decision makers should become schooled in principles of conservation biology, particularly the need to protect large unbroken areas of habitat. (Individual, Dallas, TX - #A18002.15164)

The ultimate mission, mandate and original purpose for the creation of national forests and the U.S. National Forest Service should be well understood and appreciated by each and everyone of those under employ for the Forest Service; and, each and everyone held accountable to that calling. Now do your job; and, do not be detoured by those who choose to compromise that responsibility. Those who are unable to defend their actions on the foundation of the mission and principle should be relieved from further service. The founding purpose of the national forests was to serve conservation—let there be no doubt. (Individual, Geneva, NE - #A15512.10111)

#### **TO ADVANCE COLLABORATIVE COMMUNITY FORESTRY**

The Forest Service must downsize its historic timber-production workforce through retraining for advancing collaborative community forestry. (Individual, Cleveland, OH - #A26411.15164)

#### **TO IMPLEMENT LAWS**

The United States Forest Service needs to embrace the idea and reeducate its resource managers that one cannot lead from the middle. Their training and professional development should include the basic philosophy that as public resource managers one of their main responsibilities is to protect all Americans from the constantly changing political winds. This is done by fair and consistent implementation of the public laws, not by embracing panic mode responses to emotionally driven agendas. (Association, Cody, WY - #A26503.15164)

#### **TO CARE FOR THE FORESTS**

Local forests should be responsible for taking care and protecting local forests and wild life as its first priority. The Forest Service, Fish and Wild life people should be educated in their area/field and not by government bureaucrats or "big business." (Individual, Bozeman, MT - #A665.15164)

#### **TO MANAGE TIMBER REMOVAL AND TRANSPORTATION**

Most plans that are developed for the forests are based on such things that are ambiguous to a fault or esoteric to a fault. Plans should be developed by "knowledgeable" people who can do a good job. Many of the roads that have been constructed by the USFS have been done by foresters or others who have limited knowledge about road building, including the location design, construction, and maintenance of these roads. The same is true about harvest plans that have been designed by people with little knowledge about what they are doing. Harvesting and transportation systems are ENGINEERING activities that should be done by engineers and not ill-trained foresters and managers. (Individual, Corvallis, OR - #A1132.15164)

I met with [the Siuslaw National Forest supervisor] . . . One of our first questions to her was "what are your feelings about the Roadless Initiative?" She was completely unaware as to what we were talking about. That is probably the largest concern to our organization yet today. We do not feel that [this supervisor] has the expertise to handle forest issues. Her reorganization attempt for the Siuslaw Forest

proves that point. She is a lovely person and is great with people but does not belong in a forest which grows and produces timber faster than any other forest in the world. (Organization, Florence, OR - #A11849.12230)

#### **TO PROTECT COMMUNITIES**

I am writing to you to protest what the United States Forest Service is doing to the community of Happy Camp, California.

I built a small mill starting in 1997 to help this community with some work and industry in what was called the old growth diversification program funded in part by the state and the United States Forest Service.

We expected the management of the forest to sell timber that was burned, dead, and/or dying timber that should be salvaged to protect the forest.

After we joined this program and spent a great deal of time and money, the Clinton Administration sent a man to the Klamath National Forest to close it down. This he has done, plus any other damage he could do to the people in this community. We can not even purchase a load of rock.

This forest [should] be managed, but it has to be done to preserve it and not destroy it. The people living here should have something to say about preserving this forest. We think it belongs to the people. The United States Forest Service is going to let a man that knows nothing about forestry destroy it. It is going to burn down.

I think this Ranger has to be removed at once. Or the people of this community will have to get together and remove the United States Forest Service. (Association, Happy Camp, CA - #A5708.12230)

#### **TO EFFECTIVELY COMMUNICATE THE NEW PLANNING DIRECTION**

Luckily, future forest planning on a province level basis and the direction of the Committee of Scientists will allow for collaborative efforts which can aim for ecological sustainability and integrity. A degraded forest with endangered species, increasing concern over noxious weeds, streams out of compliance with the Clean Water Act, native plant communities disappearing will no longer be able to support the heavy resource use of the past. Forest Service people need to be able to communicate the new direction and reasons for it effectively. (Union, No Address - #A8392.15111)

### **1382. Public Concern: The Forest Service should provide adequate staff and resources in the field.**

#### **TO IMPLEMENT FOREST PLANS**

The agency should ensure that there are enough staff and resources in the field so that forest plans are implemented and objectives are achieved. (Individual, Cornish, NH - #A1712.17100)

To have a reasonable chance for success, the agency must provide adequate local forest funding and staffing to not only assure proper planning but to also assure consistent high quality project implementation and monitoring. (Business, Colville, WA - #A3362.17100)

#### **TO ENSURE THAT PROHIBITED ACTIVITIES DO NOT OCCUR IN ROADLESS AREAS**

Protection will require some major management of people numbers and monitoring of actual conditions and trends. The Agency must dedicate enough human and monetary resources to assure that prohibited activities are not occurring in any roadless areas at any time. (Individual, Grangeville, ID - #A830.17300)

### **1383. Public Concern: The Forest Service should dispose of its weapons.**

The U.S. Forest should give up their attack helicopters, automatic weapons and side arms. What is the U.S. Forest afraid of that they need all these weapons? (Individual, Longview, TX - #A16468.17300)

**1384. Public Concern: The Forest Service should not employ archeologists.**

Get rid of the phony government archaeologists (who are nothing but self serving liars). Ever wondered why you never see a shingle on a storefront saying archaeologist for hire? These phony liars derive all their income from government. (Individual, Longview, TX - #A16468.17300)

**1385. Public Concern: The Forest Service should halt staff downsizing efforts.**

On the Siuslaw, R-6 the Regional Forester . . . has approved a plan to consolidate all of the southern administrative units into one office in Florence and lay off almost 30 people. Because of the travel time necessary to reach many areas of the forest from Florence and the reduction of people from the workforce, this consolidation virtually assures that vital thinning will not occur in a timely manner.

Please stop this alarming trend. Our national forests need to be managed to provide the ecological and economic needs of our society. Direct [the regional forester] to abandon the consolidation of the Siuslaw and the associated reduction in workforce. Don't allow the most productive national forest in the country to deteriorate because of lack of people and facilities. Please do this today, as I understand that the consolidation is underway and personnel on the Siuslaw are being reassigned. (Individual, No Address - #A2312.17300)

**1386. Public Concern: The Forest Service should ensure that employees support multiple use.**

All USDA Forest Service employees should support multiple-use including timber production or find jobs elsewhere. (Individual, Princeton, WV - #A18086.50200)

**1387. Public Concern: The Forest Service should allow local personnel to perform their duties.****IN ORDER TO SAVE TAXPAYERS' MONEY**

Why don't you save the taxpayers some money, and let the USFS troops in the field get on with their jobs. I work with my local rangers, and they work hard and effectively at what they do. And if they don't love it, they've got me fooled. (Individual, Clemson, SC - #A898.12125)

**1388. Public Concern: The Forest Service should allow its employees to voice their views without fear of recrimination.**

The Union is very concerned about recent threats of reprisal from the Administration toward Forest Service employees who have voiced their concerns about the Roadless Area initiative. It is totally unacceptable for any employee to be threatened by the Administration with retirement if they voice questions about the Roadless Area Initiative. Nor should they be told that they cannot be talking to certain people. Forest Service employees take pride in their public service and professionalism. Forest Service employees should be treated respectfully—most certainly by Forest Service leadership. All employees should be encouraged to have diverse opinions and to use all their skills to solve problems and facilitate public relationships and debates. (Union, No Address - #A13245.15000)

**1389. Public Concern: The Forest Service should analyze the potential impacts on its employees resulting from implementation of the Roadless Area Conservation Rule.**

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.

Downsizing has already devastated Forest Service employees. 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. (Union, No Address - #A13245.15000)

### **1390. Public Concern: The Forest Service should reduce the paperwork required of its personnel.**

MANAGEMENT of the National Forest is the absolute KEY WORD! No one can manage an area they cannot get into. Forest personnel are so tied up in paperwork they don't have time to manage so the first item should be de-paperwork them! (Individual, Spring City, UT - #A15783.15100)

## **Agency Funding**

### **Summary**

**General Comments** – Some respondents suggest that the Forest Service should be adequately funded and that these funds should be efficiently allocated. One individual urges the Agency, “Instead of spending millions on building new roads, consolidate duplicate organizational structures conceived in the days when ranger district offices were located a reasonable horseback ride from each other. Combine ranger districts, combine national forests; reduce the top-heavy overhead at the Regional and Washington level, and put that saving into the field.”

**Funding Sources** – According to some respondents, the Forest Service should remove timber in roadless areas to help support the Agency's budget. Other respondents state that Forest Service funding should not depend on revenues from timber removal or other commodity uses. One individual suggests that “income from non-timber products [should] stay within the Forest Service” in order for it to operate within its income.

**Funding Priorities and Financial Accountability** – A number of respondents provide comment regarding how the Forest Service should manage its funds. Some suggest providing funds for ranger stations, educating the public, or for fostering environmental and human values. Others suggest ways they think taxpayer funds should not be used. Suggested inappropriate uses of funds include maintaining areas restricted to the public, settling lawsuits filed by environmental groups, revising regulations, and purchasing agency vehicles. According to one individual, the Forest Service should “be concerned only with raising money to help reduce the national debt.” People also suggest that the Forest Service adequately identify the costs and benefits of the Roadless Area Conservation Rule, including the costs of implementing the Rule. Several respondents assert that the Forest Service should be held accountable for its expenditures.

### *Agency Funding General*

#### **1391. Public Concern: The Forest Service should be adequately funded.**

Back the Forest Service, pay them for their worth and potential and maybe enlarge their dept. If the government can afford to subsidize big business and fleecing of America they/we can surely pay for the work the F.S. can and will do if given a chance. (Individual, Bozeman, MT - #A665.17100)

#### **1392. Public Concern: The Forest Service should request adequate funding.**

Please ask for funds to adequately support the Forest Service's recreation and trail programs. For many years the Forest Service has said they support recreation but they have NOT asked for the appropriated monies to do so. “On the ground monies” have decreased for the last 3 years, while money for various plans have increased! Please ASK for more money for field level staff and projects. (Organization, Los Gatos, CA - #A1062.17100)

**1393. Public Concern: The Forest Service should efficiently allocate its funding.**

Instead of spending millions on building new roads, consolidate duplicate organizational structures conceived in the days when ranger district offices were located a reasonable horseback ride from each other. Combine ranger districts, combine national forests; reduce the top-heavy overhead at the Regional and Washington level, and put that saving into the field.

Instead of spending millions on building new roads, spend it on fully funding an efficient wild land fire organization, an efficient recreational organization, and more dollars into the trails program. (Individual, Gridley, CA - #A3712.17000)

**Funding Sources****1394. Public Concern: The Forest Service should seek more dependable funding.**

Develop political clout; advance the cause of more dependable funding including grants from NIH, tax exemptions for forest supporters. (Individual, Del Mar, CA - #A868.75600)

**1395. Public Concern: The Forest Service should continue to removal timber in roadless areas to support the Agency's budget.**

Let me make it clear I am not a logger, nor from a logging family. However, I would think it prudent to harvest the timber, as timber sales would help with your budget. (Individual, Big Timber, MT - #A5630.75510)

**1396. Public Concern: The Forest Service should not rely on timber sales to support the Agency's budget.**

What you really must do is figure out how to fund the Forest Service without timber sales, since I believe the Forest Service will still be necessary to protect this fabulous resource. As a nation we must figure out the best way to take care of our forests, just as we must do with our national parks. (Individual, Cedar Mountain, NC - #A28624.17130)

**1397. Public Concern: The Forest Service should insist that income from non-timber products stay within the Agency.**

USFS should insist that income from non-timber products stay within the FS. Congress should insist that USFS live within its income. IF the full cost of timbering and providing various recreational services is really charged, there will be adequate funds for providing the services the forest needs to be ecologically sustainable. Stop using the public forests to provide subsidized products to the timber industry and recreational users. Use the forest in ways that are ecologically sustainable. P.S. Experienced foresters will testify that these admonitions will result in refraining from building roads that will cause destructive erosion and that won't generate timber revenues adequate to off-set the costs of the roads (much less the erosion). (Individual, No Address - #A906.75400)

**1398. Public Concern: The Forest Service should ensure that funding for individual forests is not dependent on extractive industries.**

The budget for the local forest service representative should not be dependent on extractive industry, such that short-term business concerns pressure decisions. (Individual, Boulder, CO - #A20502.13110)

## Funding Priorities

### 1399. Public Concern: The Forest Service should manage its funding for certain purposes.

#### FOR RANGER STATIONS

By providing funding for Ranger stations, all of these problems can be addressed in a single step. Rangers provide first-hand information to forest management, from detecting fires to monitoring insect populations. By keeping the areas truly roadless, one hopes that hazardous fuels would not build up. (Individual, Rego Park, NY - #A5996.17230)

#### FOR EDUCATING THE PUBLIC

More funds in general can go toward educating the public on ecological issues, the changing of the American public, and the values of recreation to the local economies. (Individual, Missoula, MT - #A6143.17000)

### 1400. Public Concern: The Forest Service should use tax dollars for certain purposes.

#### TO FOSTER ENVIRONMENTAL AND HUMAN VALUES

I would also like to see our tax dollars used to restore wildlife habitat, water quality and the quiet enjoyment of our publicly owned National Forests. (Individual, Missoula, MT - #A3647.17100)

### 1401. Public Concern: The Forest Service should not use taxpayer funds for certain purposes.

#### TO MAINTAIN AREAS THAT ARE RESTRICTED TO THE PUBLIC

I don't think citizens should be taxed to maintain lands they can't have access to, except for military bases. (Individual, Asheville, NC - #A15196.17110)

#### TO SETTLE LAWSUITS FILED BY ENVIRONMENTAL GROUPS

I am appalled that taxpayer money is wasted on settling ridiculous law suits filed by liberal environmental groups that feel the need to save every animal or placing them on some endangered species list without evidence to even suggest that they are endangered. (Individual, Whitefish, MT - #A8765.15121)

#### TO REVISE THE ROADLESS AREA CONSERVATION RULE AND THE PLANNING REGULATIONS

The Roadless Area Conservation Rule should be implemented as it currently is written. The Bush Administration should stop trying to undermine the rule and wasting taxpayer dollars in the process. I would like to know how much was spent gathering input on the last rule, and how much has been spent trying to undo it. The administration should also let stand the new planning regulations drafted by an independent committee of scientists, and stop further waste of taxpayer dollars by attempting to undo those. (Organization, Ellijay, GA - #A17692.17210)

#### TO PURCHASE AGENCY VEHICLES

I haven't seen a Forest Service employee on a horse in years. It's one employee to one vehicle running up and down the roads doing nothing, at taxpayers expense. (Individual, Elko, NV - #A20279.17100)

### 1402. Public Concern: The Forest Service should be concerned only with raising money to pay down the national debt.

The Service should not be concerned with trying to "meet all of the desires of all of the parties". They should be concerned only with raising money to help reduce the national debt. (Individual, Port Townsend, WA - #A964.15160)

**1403. Public Concern: The Forest Service should adequately identify the costs and benefits of the Roadless Area Conservation Rule.**

The Costs and benefits listed all seem to be guess work. Most categories were assessed by “Qualitative discussion”. (Page A-21) Can you say, “junk science”? (Organization, Bozeman, MT - #A11947.17220)

**INCLUDING THE COSTS OF IMPLEMENTING THE ROADLESS AREA CONSERVATION RULE**

The alternatives and effects must adequately reflect the costs of survey and landline location, law enforcement, signing, studies, and other related costs that will be imposed on local Forests to implement this proposal. (Individual, Alturas, CA - #A28581.17120)

**1404. Public Concern: The Forest Service should not allow the cost of road obliteration to take away from other funding priorities.**

Roads exist in several of the roadless areas in the Superior National Forest. The cost to obliterate some of these roads will take away from the funds needed for other forest programs and result in increased fire fighting costs. (Elected Official, Lake County, MN - #A18049.17240)

**1405. Public Concern: The Forest Service should use money designated for the Advance Notice of Proposed Rulemaking for forest improvements.**

Other Concerns. What other concerns, comments, or interests relating to the protection and management of inventoried roadless areas are important?

Yes, this was a waste of our tax dollars and my time. We’ve already done this.

You could have used the money to improve the national forest. (Individual, Atlanta, GA - #A4509.17200)

*Financial Accountability***1406. Public Concern: The Forest Service should be accountable for its expenditures.**

A major concern is that the funding for our National Forests and other Public Lands have been cut to the bone over the years. This makes it impossible to deal with the many issues facing the Stewards of the Land. Without proper funding these agencies are stuck in the mud. On the other hand these agencies must also be more accountable with how they spend what funding they get. (Individual, Coulterville, IL - #A114.17100)

I am a Town Clerk for one of the small communities that lay in the valleys of the Manti-LaSal and it seems to me that there is a problem here. You use taxpayers’ money to maintain the Forest Service and its National Forests and yet you are barring those same people from enjoying the very forests their money goes to support. WE have to account for every penny we spend of taxpayers’ money. They have a say in how it is spent. That should apply to you also. (Individual, Centerfield, UT - #A12776.10130)

**1407. Public Concern: The Forest Service should take no action that cannot be paid for with funds raised by that action.**

The Service should take no action that it cannot pay for with funds raised by that action. (Individual, Port Townsend, WA - #A964.17000)

## Monitoring/Enforcement

### Summary

Some respondents assert that the Forest Service should monitor abuse of public lands; others further suggest engaging the public in identifying abuses. Respondents comment particularly that the Forest Service should enforce land use policies. Some suggest enforcement is needed in order to ensure environmental integrity, while others state that enforcement should be used before restricting uses. At the same time, one individual states that the Forest Service should prevent any interference with legal forest uses. Respondents offer several suggestions on how to enforce land use policies. These suggestions include strengthening and enforcing pollution and anti-dumping laws, providing adequate people-power, providing adequate funding for law enforcement, and using money allocated for administration to prosecute abusers.

#### **1408. Public Concern: The Forest Service should monitor abuse.**

There also needs to be a method of monitoring for those few who abuse the right and privilege of public lands. (Individual, No Address - #A340.15161)

#### **1409. Public Concern: The Forest Service should engage the public in identifying abuses.**

Put up questionnaire cards or pamphlets in camping areas and perhaps road interests asking the public for help in spotting problems. Maybe put in signs showing what to watch for. Use the forest guests (no one loves the forest more than the people who come there to spend time). A GOOD ROAD will help keep the forest healthy by using the eyes of those who come to enjoy our forests. Keep the roads maintained. If someone breaks a new trail . . . fine him or her . . . then block the road break. (Individual, Glade Park, CO - #A22419.90120)

I am in favor of programs similar to Cal Tip where the users are encouraged to report abuses. We need to keep users informed and allow them to monitor the areas since they are most likely the ones who will be in the area. We need to use regulations wisely to achieve access while maintaining the forest for generations to come. (Individual, Simi Valley, CA - #A16470.15161)

#### **1410. Public Concern: The Forest Service should enforce land use policies.**

Designating Areas: First of all this should be done as part of the process mentioned in question one and two. Does adding more rules work? Up the road in the same National Forest there was a problem of inappropriate and over camping (besides the litter). Problem was USFS did not have enough resources to ENFORCE the RULES. Solution they added more rules; now you can not camp, have a fire or park on the road without paying three dollars! The effect on the partying college kids from the other side of the mountain? They still drive up in daddy's 4X4, camp where they like, start fires anywhere they please, leave their beer cans along the sides of the whole ten mile road, and would you believe they do not pay the three bucks to park either! Maybe those well meaning people, who dug up and removed all the fire rings, should have instead dug up the roads at both ends! I could still walk there and there are no parking fees in my yard, but if there are any fishermen left they might be a little mad. (Individual, Center Sandwich, NH - #A3669.15161)

I'd like to see facts and data that really supports this roadless concept as to its benefit. Perhaps this is just another way to side-step problems with poor regulations, or in not enforcing existing laws? . . . A few areas, that have been poorly managed or that some people have abused, should not spoil it for the rest of us. However, I think that most people would support a "road-limited" policy. In many areas such as Nevada, there are way too many dirt roads (because of idiots who have to 4 wheel drive every ridge and

peak). However, many of these *do-it-yourself* roads could have been prevented if the current “No Off-Road Travel” policies had been initially enforced with severe penalties. (Individual, Elko, NV - #A21907.10110)

Currently I live in Colorado and enjoy the outdoors as often as possible, through many types of activities and recreation. It is especially pleasing to have truly wild areas to explore and view, however, these areas are shrinking year by year. I often encounter new ATV trails, improper campfire practices, out of season kill remnants, and lots of trash. It is my belief that the current system of protecting these areas is failing. Either the areas of these local agencies to observe are too large, they are under funded or under staffed. I have also found in some localized places, when informed these agencies say that there is nothing they can do, or outright admit that they do not care. (Individual, Kittredge, CO - #A11768.13110)

#### **TO ENSURE ENVIRONMENTAL INTEGRITY**

Roadless area management needs sufficient enforcement to ensure the environmental integrity is preserved. (Individual, Ennis, MT - #A102.17230)

#### **TO PROVIDE FUNDS FROM CITATIONS**

Why not police the roads and give citations for the ones that are abusing the areas. I know you will say that you don't have money for the extra manpower—but the money generated from the citation should more than cover it. We have encountered MANY people drinking and such and would greatly appreciate them being taken care of as we are on family outings when we are there and do not appreciate this kind of activity in front of our children.

Please reconsider this drastic act and consider the thousands of families and individuals that you will be affecting. (Individual, No Address - #A6719.17130)

#### **BY STRENGTHENING AND ENFORCING POLLUTION AND ANTI-DUMPING LAWS**

I think pollution and anti-dumping laws of public lands should be strengthened and enforced. IRAs should above all else be clean. (Individual, Fraser, CO - #A30203.45400)

#### **BY PROVIDING ADEQUATE MANPOWER**

We have noticed that once roads are opened they often become illegal trash dumping grounds, because the areas are isolated and there is not enough manpower locally for enforcement. (Individual, Randleman, NC - #A14005.15161)

#### **BY PROVIDING FUNDING FOR ADDITIONAL LAW ENFORCEMENT NEEDS**

In some forests such restrictions might require the implementation of law enforcement patrols. In these cases, USFS should provide additional funds to cover the need for new law enforcement positions. (Individual, No Address - #A29334.15161)

#### **BY USING MONEY ALLOCATED FOR ADMINISTRATION TO PROSECUTE THOSE WHO ABUSE THE FOREST**

I would suggest spending some of the money you use administering to use punish those that abuse the forest. This would include off road vehicles as well as hiker and horse backers. Allow all present roads to be used and make laws with penalties for those that leave the roads. Gather help from ORV clubs to help enforce this. I have witnessed local clubs monitoring areas for just such a reason. (Individual, Longmont, CO - #A17891.3.17230)

#### **BEFORE PROHIBITING FURTHER USES**

All current and legitimate activities should be allowed. The Forest Service must better enforce current laws for dumping, off-road use, etc., before further prohibiting uses. (Individual, Fountain Hills, AZ - #A5990.90000)

**1411. Public Concern: The Forest Service should prevent the interference of legal uses of forest resources.**

Interference with legal users of forest resources must be prevented. Any form of interference or intimidation must be swiftly crushed, and the perpetrator(s) punished. (Individual, Spring Creek, NV - #A26896.15110)

## Chapter 6

# Protecting Forests, Communities, and Property Access

This chapter includes three main sections: Protecting Forests (Question 3), Protecting Communities (Question 4), and Protecting Access to Property (Question 5).

### Protecting Forests (*Question 3*)

***Question 3: Protecting Forests.*** How should inventoried roadless areas be managed to provide for healthy forests, including protection from severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreaks?

This section includes five subsections: Natural Disturbance Processes and Forest Health General, Roads/Access, Timber Removal, Fire Management, and Insects, Disease, and Noxious Plants.

### Natural Disturbance Processes and Forest Health General

#### Summary

**General Comments** – A number of respondents comment about forest health management in general. Some suggest using the precautionary principle, or managing forest health according to land use designations and management restrictions. Others ask the Forest Service to focus forest health management efforts in roaded areas rather than roadless areas where some believe the need is more urgent. Another individual suggests that wilderness areas cannot be properly managed for forest health because these areas promote fire and insect and disease outbreaks.

Respondents also comment about forest health management strategies. Several suggest that the Forest Service develop a detection and prevention strategy for natural disturbance events. Others suggest the Forest Service have contingency plans in place to act quickly to manage disease, blowdown, and wildfires. One individual proposes the Forest Service develop plans and strategies similar to those used by the Federal Emergency Management Agency.

Several respondents suggest engaging local non-profit groups to help with forest health management activities. Others say that forest health management should be left to professional Forest Service personnel.

Many respondents comment about forest health, specifically as it relates to roadless area management. A number of people suggest making forest health a top priority, allowing decisions

to be made at the local level, and protecting adjacent lands from insects, disease, and fire. A few individuals state that the Forest Service should manage forest health in roadless areas no differently than in the rest of the forest. One individual asserts, “The RACR does not preclude employment of management actions to control insects and diseases which may occur in IRA, nor does it preclude fire/fuel management strategies within the National Fire Plan.”

**Adequacy of Analysis** –A number of respondents ask for more in-depth analysis, particularly with respect to forest health. This includes requests to inventory forest health at the local level and to fully disclose the consequences of various management strategies, and to continuously collect forest health data. Some organizations suggest the Forest Service use roadless areas as a baseline to gauge the effects of management techniques on forest health in other areas. A few respondents suggest the Forest Service provide evidence that the Roadless Area Conservation Rule will have a positive effect on fire and forest insect management, or provide studies to support the claim that thinning small-diameter trees will restore ecological processes, provide habitat for endangered species, and avert catastrophic wildfire.

Some respondents comment about concepts related to forest health. Some would like the Forest Service to define the terms “healthy” and “forest health.” One individual states, “First, we must define a healthy forest. Healthy according to whom?” Others state that forest health may be defined according to the management objectives at each forest site. One individual suggests the Forest Service define temporary and short-term forest health treatments. Several respondents recommend the Forest Service acknowledge the concept of natural disturbance regimes.

**Funding** – One individual advises the Forest Service to consider that policy changes and attendant litigation have cost a great deal of money that could have gone to forest health treatments. Another individual states that there should be a process in place where litigants are held responsible for damages to the environment that happen when lawsuits prevent health management activities from occurring.

**Management** – In general, people recommend either ‘active management’ or ‘ecosystem/restoration management.’ Respondents state that the Forest Service should actively manage resources in roadless areas. Suggested active management practices include timber removal, managed fire, and insect control. (See also subsequent sections on fire management and insects, disease, and noxious plants.) Other respondents suggest that the Forest Service utilize best management practices and work to restore forest health. One individual suggests the Forest Service use conditions that existed prior to Euro-American contact as a baseline for management.

Other respondents assert that forest processes such as fire and insects and disease outbreaks should be allowed to run their natural course. People state that these elements are part of the natural forest stand replacement cycle and should not be suppressed or controlled. Respondents also say that human activities, such as road access and timber removal, cause more damage than natural processes.

One individual states, “The so-called ‘exceptions’ to the road building and timber harvest prohibitions are too narrow to provide the needed flexibility.” This person suggests that these exceptions will foster more litigation and that the needed flexibility can be provided by allowing local forest supervisors to tailor forest plans to respond to local circumstances. Another individual requests that the Forest Service define specific national criteria for management exceptions requiring roads in designated roadless areas. On a similar note, one respondent

suggests the Forest Service constrain exceptions to the Rule with specific conditions and restrictions.

## *Forest Health Management General*

### **1412. Public Concern: The Forest Service should follow the precautionary principle.**

#### **TO DECIDE IF ADDITIONAL TIMBER REMOVAL WILL IMPROVE FOREST HEALTH**

The US has signed a number of international treaties invoking the Precautionary Principle, which says in essence: **“When there is a significant probability of harm to the environment or to human health, it is not necessary to have 100% proof of harm to justify preventive and corrective actions.”** The Forest Service should follow the Precautionary Principle as they decide if more logging will improve the health of the forests. (Individual, Spokane, WA - #A23849.30100)

#### **TO MANAGE THESE AREAS MINIMALLY**

Use the Precautionary Principle and “manage” these areas minimally. Indeed “manage” is the wrong word, since we do not manage the forests; we influence and impact them, they manage themselves. Since the roadless areas have likely been “managed” minimally, they should be left for future generations as reference areas, in humble admission that our forestry is ignorant of many subtle ecosystem dynamics, and that our management is still incapable of appreciating and integrating the diverse social and economic interests in our forests. Indeed, insufficient time has passed since true old growth ecosystems, especially in the West, were first clearcut to know whether they do grow back as they were. The whole notion of a decadent forest is outdated. The latest research from the Wind River station shows that old growth forests continue to function as carbon sinks. (Individual, Cleveland, OH - #A26411.30100)

### **1413. Public Concern: The Forest Service should manage forest health according to land use designation and management restrictions.**

IRAs should be managed according to how they are allocated. If they’re allocated to non-developmental uses (such as roadless recreation or recommended wilderness) they can be prescribed burned to prevent the buildup of hazardous fuels. If they’re allocated to developmental uses, they can be logged, thinned or prescribed burned. (Individual, Libby, MT - #A2301.30510)

#### **ALLOW MORE OPTIONS FOR MANAGING FOREST HEALTH IN ROADLESS AREAS THAN IN WILDERNESS AREAS**

Emphasizing that areas identified to continue as unroaded, non-wilderness areas should not be managed as pseudo-wilderness, the options for controlling wildfire and insect/disease outbreaks should be much greater compared to wilderness areas (e.g., use of chainsaws, motorized equipment, and aircraft). Also . . . noted above, many forest management activities may be feasible/desirable within the scope of the purpose of these unroaded areas to help prevent the buildup of hazardous fuels and insect/disease outbreaks (e.g., prescribed fire, thinning, aerial spraying). (State Agency, Saint Paul, MN - #A30025.30200)

### **1414. Public Concern: The Forest Service should focus its management efforts on roaded areas rather than remote roadless areas.**

Given limited resources, how can the Forest Service conserve managed landscapes? The Forest Service seems confused about where the controversy lies. Relatively speaking roadless lands are not controversial. The data and public opinion supports the status quo. In contrast, managed Forest Service lands are in poor to fair ecological condition, despite billions of dollars of public expenditure over the past sixty years. How the US Forest Service managed those lands will largely determine agency efficacy and viability, and perhaps the credibility of the forestry professional as well. (Individual, Colville, WA - #A20889.12120)

### **BY TREATING FOREST HEALTH IN ROADED AREAS**

The agency should focus its efforts where they are needed most urgently, in roaded areas, not roadless areas. Most of the areas that are at greatest risk of unnaturally intense fire or excessive mortality due to insects and disease are in already roaded areas. The areas where fire risk is greatest are low elevation forests that evolved with frequent low intensity fires that burned the under-story below larger trees. These areas were also most heavily logged and roaded. Roadless areas on the other hand, are often at higher elevations and moister and wetter than roaded areas. They evolved with longer fire intervals, thus the effects of fire suppression and past timber management have not been as acute.

Furthermore, even in roadless areas where forest health concerns do exist, the Forest Service ought to be very careful to not trade one environmental liability—the effects of constructing new roads in roadless areas—for another—treating forest health. Exchanging one liability for another is not good public policy. (Organization, Arlington, VA - #A23474.30100)

Applying effective fire suppression/exclusion results in an increase in fuel hazards and potential fire severity, and a decrease in biological diversity and ecological integrity. The forests most in need of vegetation and fuels treatments to reduce fire hazards, insect and disease outbreaks, and restore biological diversity are not roadless areas, but rather, areas that have already been roaded and logged. Building roads allegedly for the purpose of “forest health restoration” or “fire hazard reduction” only makes sense if mechanical thinning treatments are being proposed. However, the use of mechanical thinning as a tool for fire hazard reduction is highly controversial, scientifically unsubstantiated, and fundamentally experimental in nature. Unfortunately, it appears that mechanical thinning is becoming yet another euphemism for industrial-scale commercial logging—one of the prime management activities that degrade ecosystems and cause forest health/fire hazard problems.

In some instances, it has been demonstrated that commercial thinning treatments intended to reduce fire hazard have actually had the opposite effect. Although gross tonnage of fuels may have been reduced, there has been a net increase in hazardous fine fuels accumulating on the surface and available for burning—primarily logging debris or “slash.” Also, changes in microclimate from tree removal serves to increase solar radiation and wind penetration, which in turn increases site flammability following thinning treatments. (Organization, Eugene, OR - #A30352.30500)

Extensive management of these areas is not economically possible or logical. The only logical solution to protecting forest health in general is to manage species and spacing in the already roaded and logged areas, wherever extensive forest management is possible. This will reduce fuel loadings on the forest floor and ladder fuels that lead to catastrophic, stand replacement fires. These fires result in wholesale water quality and wildlife devastation in addition to the huge fire fighting costs, and loss of homes, property and lives. This same management is definitely not appropriate for roadless areas, however, which should be managed as wilderness, since this is what they are and is most cost effective. (Individual, Olympia, WA - #A20849.30200)

Fires in unroaded areas are not as severe as in roaded areas because of less surface fuel. Many of the fires in the 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 more intense, due to drier conditions, wind zones on the foothill/valley interface, high surface-fuel loading, and dense stands (Hann et al.1997).

Frost (1999) expands:

As summarized earlier in this paper, scientific assessments conducted for federal lands in several western regions generally agree that previously roaded and logged areas should be the highest priority for fuels reduction and forest health treatments (SNEP 1996, FEMAT 1993, Hann et al. 1997). (Organization, Missoula, MT - #A613.30500)

### **BY RESTORING ROADED AREAS TO SUSTAINABLE LEVELS**

The benefits of managing forests to reduce the potential for large scale natural disturbance are undeniable. Given that these natural systems, for example the ponderosa pine forests of the Interior

Columbia Basin, have been put in a position well outside the range of historic variability, it is necessary that active management be used to return them to a sustainable condition. However, given certain budgetary constraints to accomplish such work, the currently roaded areas are of far greater priority than are roadless areas. When all or most of the roaded areas have been restored to sustainability, then it's time to begin focusing on the roadless areas. First tools for consideration should be pre-commercial thinning and prescribed fire. Commercial logging should be used as a last resort to achieve the desired conditions. (Individual, La Pine, OR - #A30048.30100)

**BY CONSULTING WITH LOCAL SUPERVISORS, STATES, COMMUNITIES, AND TRIBES**

We believe that local supervisors, in consultation with states, communities, and tribes, should focus their planning attention on proper harvesting in areas already roaded, and on means of improving forest health without building additional roads in inventoried roadless areas.

The existing rule allows for exceptions [for] wildfire protection and forest health and local supervisors should be given narrow authority to grant such exceptions in consultation with state, Tribal and local government and other federal agencies. (Individual, Olympia, WA - #A8793.13130)

**1415. Public Concern: The Forest Service should consider that wilderness areas cannot be properly managed for forest health.**

Wilderness areas cannot be properly managed. They become a threat to citizens and private property owners. No vehicles are allowed in the areas and no hazardous ground fuels can be cleared which promotes fire danger as well as disease and insect outbreaks. (Individual, Pencil Bluff, AR - #A22117.30100)

**1416. Public Concern: The Administration should clarify its position on natural disaster management.**

The Bush administration needs to clarify its position on natural disaster management. In some cases, such as along the Mississippi River, the current administration threatens towns and communities with the removal of federal disaster relief. Yet, this summer the federal government has spent millions of dollars and six fire fighters have died attempting to put out blazes. The only common thread is an anti-environment tone from the Bush administration. People that want to protect their environment are punished while those that destroy it are supported with my tax dollars. (Individual, Boulder, CO - #A26520.15000)

**1417. Public Concern: The Forest Service should not allow excessive support for short-term visual values to prevent the implementation of forest health treatments.**

Values should then be synthesized with the value of forest health needs. That connection is highly important as excessive support for short-term visual values can and does prohibit the implementation of treatments that result in healthier forests. Aquatic and vegetative values must be applied in a balanced manner. (Organization, Moscow, ID - #A25639.45000)

*Forest Health Management General – Management Strategies*

**1418. Public Concern: The Forest Service should develop a detection and prevention strategy for all natural disturbance events.**

**BY DEFINING THE EXPECTATIONS OR PROCEDURES IN THE FOREST PLAN AND ASSOCIATED RESOURCE PROGRAM PLANS**

You question how the inventoried roadless areas should be managed to sustain their health, including wildfire protection? It is interesting that your agencies and the Universities that train your people should need to answer this question. The problem I see is a lack of a lot of alternatives for many ecosystems based on the situations created by the decisions and the willingness of the American Taxpayer to pay. I don't believe the agency has been at all truthful about the short and long term outcomes or expectations

from various regimes of management in some ecosystems, there has been a great effort to sell effects based on what you believe people want to hear. In particular your decision to use something as unanchored as “ecosystem management” is an example of the Services searching for results without knowing what they will be. If there were conflicts about expected outcomes over a long term of time the agency has acted as though all things were possible. That might be true over some sort of array in space and time, but most people were evaluating things within their relatively short life span in relation to the normal western forests. It is unfortunate, but I believe most of the public’s view of the forest is a series of what I call Kodak moments. There is little comparison with things that change about the Forest over time. Those of us that worked on and studied forests, their various interactions and visit the same areas many times see how really quickly things about a forest change. The changes if not treated or altered at appropriate times actually preclude a number of alternatives and in some cases limit treatments or even publicly acceptable decisions.

That is unless “mother natures” great excuse, burns through and restarts the alternatives on another decision path. As a public agency with many conflicting elements I find it hard for the agency to make any promised outcomes that are based on a time dependant set of events. That concept seems poorly understood and even more poorly portrayed in your decision documents. To have a public accept your decisions you must portray that you know and understand the various decision paths and the consequences of not getting certain things implemented. The obvious thing is that some members of the public can accept dead trees from the numerous perturbances in the Forest. The most obvious thing that is seldom really discussed is how these alter and influence management outcomes. Areas managed for timber production that are burned or insect affected have a presumed waste, yet that process in a wilderness is looked at as naturally acceptable because that apparently is how that system currently functions naturally. It meets one goal but foils another.

It is imperative that every area of National Forest has the detection and prevention strategies for all the natural perturbation events such as fire and disease or insects. The expectations or procedures should be defined in the Forest Plan and associated resource program plans. (Individual, Cambridge, ID - #A11714.30100)

**BY INCLUDING DESCRIPTIONS OF HOW DISTURBANCES ARE ALLOWED OR ARE PURPOSEFULLY CARRIED OUT IN PLANS FOR ALL ROADLESS AREAS**

Providing sustainable healthy forests should be the goal of all management. Our western forests are disturbance dependent, therefore plans for all Roadless areas must include descriptions of how such disturbance may be allowed or purposefully carried out. Such disturbances will logically favor orderly timber harvest and subsequent post harvest measures, slash disposal, site preparation, reforestation, and stand stocking control. Road access may be provided by some permanent roads as well as temporary ‘roll up roads’.

Prescribed fire or naturally ignited fires burning under prescription can also be used to reduce forest fuels, but such means often results in leaving large volumes of dead but unconsumed trees standing and down.

Stand examination and other inventories must be made, and all existing and predicted future conditions must be accurately described and mapped. Only then can officials bring forth the data and provide necessary analysis to the interdisciplinary team and the public. (Individual, Manhattan, MT - #A21848.30520)

**1419. Public Concern: The Forest Service should have contingency plans in place to act quickly to manage disease, blowdown, and wildfires.**

**INCLUDING PREPARATION OF AN EIS**

The Forest Service should have the necessary plans and EISs in place so they can act quickly to deal with disease, blowdown, and wildfires. (Individual, Minneapolis, MN - #A8016.30100)

In exceptional cases where insects and fuels do become a hazard, an environmental impact statement for proposed action can be prepared. This was done in the Boundary Waters Canoe Area Wilderness after a 1999 storm left ten times the normal fuel buildup. (Individual, Grand Marais, MN - #A15355.30100)

**INCLUDE UNEXPECTED EVENTS IN FOREST PLANS SO THE FORESTS CAN BE MANAGED EFFECTIVELY AND RESPONSIBLY**

The blowdown in the Superior National Forest, I believe it was July 1999, highlights a major problem. Instead of acting quickly to salvage timber as practical and to reduce fire danger, the USDA forest service could do nothing except write environmental impact statements (EIS) for a year and a half. This inaction must be dealt with, and my suggestion is to include unexpected events in the forest plans so the forests can be managed effectively and responsibly. Having the responsibility to manage must be coupled with the authority to act. The state and local communities tend to act quickly to deal with the large blowdown, but why can't the US forest service act quickly? What needs to be done or included in the forest plan so the forest service can act quickly in the future? (Individual, Minneapolis, MN - #A8016.30500)

Even if the final designation is for roadless area designation, contingency plans must be included to allow for human intervention in case of serious fire danger, disease outbreak, human use controls, etc. (Individual, Starkville, MS - #A11715.30200)

**1420. Public Concern: The Forest Service should develop plans and strategies similar to those used by the Federal Emergency Management Agency.**

My view is that wildfires differ from tornados, floods, and earthquakes only in the perception that they're preventable. Even in highly-managed forests, this isn't always the case. Why not develop the same plans and strategies the FEMA uses for other disasters? (Individual, New Haven, CT - #A706.30400)

***Forest Health Management General – Public Involvement*****1421. Public Concern: The Forest Service should employ local non-profit groups to observe forest health conditions.****TO OFFSET THE COST OF FOREST HEALTH MANAGEMENT**

The Forest Service should employ (not hire) local non-profit groups to help offset the cost of observing and keeping the forest healthy. For instance, I know a group of motorcycle riders in Montana who could tell the Forest Service exactly where the most dangerous build-up of fuels are. Their knowledge could be put to good use if only there was mechanism to receive their input. (Individual, Palmer Lake, CO - #A23361.17140)

**IF THE FOREST SERVICE DOES NOT MANAGE FOR FOREST HEALTH; A LOCAL NONPROFIT ORGANIZATION SHOULD DO IT**

Under such a law, forest hazard "management" (if any) should be performed by the forest service itself, or by concerned local non-profit organizations. Any for-profit enterprise involved in forest hazard management should be closely monitored, if not prohibited, for violation of a conflict of interests. (Individual, Olympia, WA - #A25533.30600)

**1422. Public Concern: The Forest Service should engage other government entities to educate and advocate practices to promote forest health.**

If it is responsible for managing the health of the nation's forests, then the Forest Service can not restrict itself to parcels within boundaries on a map but must include protection of the entire forest and protect it from its greatest adversary, mankind. In doing so, the Forest Service must engage not only the public but itself and other parts of the government to educate and advocate practices and policies that would promote forest health, including but not limited to: acting as the champion of the forest as an ecosystem, educating Congress about ecology and biodiversity and employing all possible means to persuade Congress to make statutory that the mission of the Forest Service is to champion the forest as ecosystems, eliminating the leasing of forest lands for grazing—a practice that has been widely documented as very destructive to forest health; working with the department of Labor and Commerce

to assist communities and small businesses economically dependent on forest use to other bases of economic viability; assuring that the EPA is fully aware of the impacts of environmental quality on forest and employing all possible means to move the EPA in directions that would promote forest health through environmental quality; advocating alternatives for all forest resource uses, especially but not limited to extractive . . . (Individual, Nederland, CO - #A19016.15167)

**1423. Public Concern: The Forest Service should not ask the public how to manage forest health on public lands.**

**LEAVE IT TO PROFESSIONAL FOREST SERVICE PERSONNEL**

It is absurd that you would ask the general public how to manage lands that are over-run with dead timber, beetle infested pines and potential fire hazards! We pay taxes to hire trained professional Forest Service personnel with years of collective service and the know-how to deal with these issues. You know what needs to be done! (Individual, Annabella, UT - #A30323.30100)

***Forest Health Management General – Roadless Areas***

**1424. Public Concern: The Forest Service should consider forest health when managing roadless areas.**

When evaluating Roadless Areas, the Forest Service should consider:

The likelihood of catastrophic wildfire, or insect or disease outbreaks. (Individual, Des Moines, IA - #A12587.30100)

When evaluating Roadless Areas, the Forest Service should consider:

The overall health of the area. (Individual, Des Moines, IA - #A12587.30100)

**BY MAKING IT A TOP PRIORITY**

The health of the forest and associated lands has to be the top priority for the management of roadless areas. Other considerations have to be set aside if they interfere with the highest priority. As a country we have a very poor history trying to implement multiple use. (Individual, Ennis, MT - #A438.30100)

Let all people know the highest priority in a roadless area is forest health. The Forest Service will do as Teddy Roosevelt wanted them to do when he established the National Forests, promote forest health and allow whatever activities on the forest that will promote this goal. (Individual, Ennis, MT - #A438.30100)

I believe that the health and conservation of wilderness to be a higher priority than our consumer needs for more natural resources. Having spent much time in our Forest Service lands as a wilderness guide, I see the impact of roads, even remote roads, on the ecological systems of the area. Just putting in roads, much less the intended use of the roads, (mining, logging, etc), creates disturbances in the flow of life in a forest. (Individual, Boulder, CO - #A212.50000)

Local and regional economic interests dominate forest management policies even though these lands do not exclusively belong to these interests. Although I live in Montana, I have an equal stake in national forests in Utah to those held by Utahans, and vice versa. The vast majority of commercial logging in the U.S. occurs on privately-owned lands and the use of national forests for this purpose is no longer a legitimate use of national forests. They are not farms, they are forests. While I have no problem with certain activities, such as hunting, I see little policy difference between a roadless forest and a national park. Thus, I believe the pendulum of policy must start to swing closer to preservation than to consumptive use in our national forests. (Individual, Billings, MT - #A277.50000)

Economic interests of private corporations should have less standing than the general interests of the national policy, and the Forest Service should recognize and argue the case that the protection of many areas from logging will inevitably raise the prices for forest products from other areas that are harvested by timber companies. It is therefore in the interests of everyone to maintain large protected areas for both current environmental health and possible rotation as future sources of supply of forest products. In no case should short-term economic interests of a few take precedence over the national interest of maintaining healthy forests. (Individual, New Haven, CT - #A616.30130)

#### **BY CONSIDERING THE HEALTH OF THE ENTIRE FOREST/REGION**

It is a sunny morning and I am writing from my porch, overlooking a small patch of my forestland and that of my adjacent neighbor, U.S. Timberlands. We bought this patch of forest ten years ago as a recreation haven, for access to hiking and snowmobiling, but over the years I have learned about forest management, and now regard it as a place to respect and protect, not just to enjoy. As I watch my neighbor ruthlessly and inappropriately clearcut in mixed conifer and ponderosa pine forest, I worry about the health of the entire forest region in this area, with the resulting microclimate and ecosystem effects of such damaging timber practices.

This is private land, albeit in the questionably legal possession of a timber corporation. However, I have the same concerns about public land, which has been treated with similar disregard for forest health. (Individual, Olympia, WA - #A4929.30100)

Much of the watershed area in the western states is not forest at all but rangeland. If we do nothing to manage for resource health the resources will become weaker and the area will be invaded by species that thrive with regular wildfire. Bare ground will become the norm and healthy soils and native plants will be a thing of the past. (Individual, No Address - #A7186.65000)

#### **BY FOCUSING ON LONG-TERM FOREST HEALTH AND ECOSYSTEM MANAGEMENT**

The Forest Service has a unique responsibility in the public trust. More than most public agencies, the Forest Service's work is critical to the well-being of future generations. Long-term issues such as maintaining biodiversity and protecting ecosystems are integral to the responsibilities we entrust to you. You are stewards of a vital part of America's future, and if you can maintain that as your top priority, it will help you sort out the many competing short term economic and political pressures. You seem to have grasped some potential techniques already, such as this public comment opportunity. Work on it, keep your eye on the long-term health of our forest ecosystems. You'll figure it out. (Individual, Chestertown, MD - #A462.15110)

#### **BY USING A STEWARDSHIP FORESTRY CONCEPT**

The USFS no-burn policies of the last 100 years contributed to the unnatural build up of hazardous fuels, disease and insect infestation. Though unrealistic to return to the "natural ways" of yore, the *stewardship forestry* described in the RAC DEIS May 2000 offers a functional and scientifically sound method of keeping forests healthy. "Severe wildfires" are a part of the natural order of forest life and should return to their proper place. Insects and disease also perform natural functions, wildfires keep these two "blights" in check. (Individual, Kemmerer, WY - #A8383.30100)

#### **BY ALLOWING DECISIONS ABOUT FOREST HEALTH TO BE MADE AT THE LOCAL LEVEL**

The Forest Service should allow local forest-level decisions for forest health treatments, including timber removal to reduce the risks of wildfire, where such activities will not adversely impact roadless areas. (Individual, Laramie, WY - #A949.30520)

Protecting forests by making decisions in Washington D.C., absent the knowledge and information available on the local forest level, does not allow for adequate protection of our National Forests. Local input is critical to forest health. The few maps that were provided were incorrect because local sources were not consulted. To declare roaded area unroaded by edict, and then manage them based on that misinformation, will only result in inadequate management which then leads to additional fire danger. It also fails to allow for adequate management of other forest problems, such as disease infestations, blow downs and insects. (Organization, Yreka, CA - #A8381.30100)

Let the local managers manage the roadless areas. Where mortality strikes in stands of timber, whether it is from insect, windthrow or previous fire, it must be dealt with. The most obvious method of dealing with it is to remove it. In most, but not all cases, we think the roadless areas should be kept roadless and the timber removed by aerial means. Technology exists to do this and do it in an economical manner if it is done in a timely analysis. If the mortality is allowed by court action, what value was in the commodity is lost to deterioration. If the project ever clears all the analysis and legal hurdles, it seldom resembles what was originally proposed by the local manager who actually knew what needed to be done. And at that point the project, if in the form of a timber sale, is so deficit that it cannot pay its own way with the value of the ruined commodity. And so the fuel builds and the forests burn on what has become a predictable basis. Between 40 and 60 million acres of this situation now exists on National Forest land, with a high percentage of this in roadless areas. It has gone on for so long now it will be a major undertaking to clean the areas up. But again, you need to ask yourselves as managers of the forest, "Is it better to take an active role in management or let nature take its course?" We think you are seeing a shift in what the public thinks when it comes to forest health and fuel buildup. Look at the Bitterroot where close to 400,000 acres burned last summer. The local population has changed over the years toward the preservationist side of the scale and almost 100% of the logging has been stopped.

Now after seeing the two months of raging infernos a recent poll shows almost 90% of the locals think the fire killing timber should be removed, even in the roadless areas, in order to reduce fuel loading for the future. Of course much if the fire could have been prevented if forest health programs has been carried out. So in summary, take charge of forest health and use all the tools you have at your disposal to take good care of our roadless [areas]. (Individual, Canby, OR - #A15507.30500)

It is essential that most roadless areas remain as roadless as possible, but this should not be at the expense of forest health because according to the NFMA protection of the resources to maximize the use of those resources is extremely important. Decisions on whether a road is necessary to maintain forest health should be made on a local forest level, decisions on local forest cannot be made adequately on a national or even regional level. Even if roads are not constructed, consideration should be given to clearing hazardous fuel buildup, again on a local forest basis. (Organization, Huntsville, AL - #A13542.30200)

We think that the current role provides sufficient and appropriate general guidance for addressing concerns related to managing the health of the forest and addressing the effects of wildfire and pests. We think the plan revision process can add specifics to those general guidelines. Among other considerations, the plan revision process should:

Define the values, goal, and objectives for which each roadless area is managed. Direction for management activities related to forest health should be in harmony with the values for which the area is managed.

Identify those roadless areas where management activities to reduce the threat of wildfires will not be applied, recognize that periodic wildfire - in some cases even severe wildfire—serve to engender health forest ecosystems.

Identify thresholds of "fuel loading" that might trigger management activities to reduce the effects of wildfire, considering the effects may be more significant for certain localities than for others.

Provide that insect and disease outbreaks may be controlled when necessary to protect the values for which the area is managed, recognizing that native pests and diseases play a significant role in promoting the overall health of the forest.

Provide that eradication of recently established populations of exotic pests may be considered when outbreaks exceed an acceptable threshold.

Provide that first consideration be given to biological controls, hand control methods, and pesticides when pest outbreaks exceed an acceptable threshold. (Organization, Damascus, VA - #A17723.30100)

A blanket, national EIS diminishes local officials' flexibility to take action to prevent losses of important ecosystems due to catastrophic fires or other events. Construction of a low-impact, temporary road or

firebreak to fight a fire is preferable to a catastrophic fire that wipes out a vital ecosystem remnant. Harvesting timber infested with beetles, for example, may also require mechanical thinning to maintain forest health but that should be done with the least amount of impact possible to roadless areas. Idaho is no longer a mosaic of large ecosystems that can sustain large fires without loss of vital habitat. Today's forests are isolated fragments of once majestic ecosystems. Loss of any of these fragments to catastrophic fire could jeopardize vital wildlife and plant habitat and thus threaten the sustainability of important species. Catastrophic fire can also wipe-out backcountry transportation systems such as traditional trails and bridges. (Permit Holder, Boise, ID - #A29589.30500)

#### **BY CONDUCTING ACTIVITIES WITH CLEAR PROCEDURES THAT ARE OPEN TO THE PUBLIC**

Management actions with a clear purpose, such as maintaining fire regimes in long-leaf pine forests or removal of non-native species, may sometimes be necessary in roadless areas. In such cases, activities should be conducted with clear procedures that are open to the public. In addition, these activities should be conducted without roads and with minimum disturbance to roadless characteristics. (Organization, Washington, DC - #A18031.30200)

#### **BY BASING MANAGEMENT DECISIONS ON ROADLESS AREAS' INDIVIDUAL CHARACTERISTICS**

Inventoried roadless areas should be managed to provide for healthy forests based on their individual characteristics. That is, some roadless areas are sparsely forested on steep rocky terrain with shallow soils, while others are heavily forested on moderate terrain with deep soils. We suspect protection from insects, disease and wildfire are most important in these latter instances. They should be protected by building roads, harvesting old, overmature stands in a preemptive strike, and thinning stands with an abundance of small trees and brush in the understory which provide ladder fuels to the crowns of larger trees.

On the other hand, roadless areas with scattered stands on steep rocky slopes should be managed by leaving them alone. Insects, disease and fire can play their natural role there without unduly threatening surrounding national forest land. (Organization, Saint Anthony, ID - #A13225.30000)

There is no "one" answer as to how IRAs should be managed, since every roadless area is a distinct and unique unit. The diversity of factors that must be addressed in managing roadless areas is profound. Forest types, stand conditions, values at risk, management objectives and the context of the area in relation to the surrounding lands are among the factors that must be considered. Consequently, each IRA should be managed individually.

Since the agency must preserve the IRA in the condition it was in as of the date of the designation as a Roadless Area, any activities that significantly alter the condition of the IRA at the time of designation are prohibited. The agency should conduct forest health projects, including but not limited to timber harvest, in order to preserve the condition of the area at the time of designation.

It is unwise for the agency to let any national initiative eliminate effective tools for preserving the conditions of IRAs as well as managing other areas of the forest. (Organization, Salt Lake City, UT - #A15263.30000)

#### **TO PROTECT ADJACENT LANDS FROM INSECT, DISEASE, AND FIRE**

The health of our forests also directly impacts our ability to provide protection for communities, homes and property. Insects, diseases and fires do not recognize the artificial boundaries placed across the landscape by governments, organizations or private individuals. To effectively treat these problems and/or restore the landscape to a more resilient condition, management actions need to be planned and carried out within a landscape context which means the impacts to NFS neighbors must be accounted for. Imposing a one-size-fits-all regulation on roadless area management will inhibit the Forest Service's ability to participate in these necessary landscape restoration and risk-reduction efforts.

The CWSF [Council of Western State Foresters] believes the potential impacts of known forest health problems, fuel load problems, and fire suppression needs on adjacent landowners must be considered in the development of roadless area management decisions. Without such considerations, liability and loss of trust will again rule the day. (Professional Society, No Address - #A29920.30600)

The lands ultimately allocated to roadless status will in large measure have to be allowed to grow, mature, and decay under natural process. This does not mean that silvicultural treatments such as thinning, burning, or harvesting should not be allowed. Those activities will simply be limited to the topography and/or economics of each opportunity. Management's ability to protect adjacent roaded areas, such as plantations, rangeland, or riparian areas from insect, disease, and fire threats should be without question. With the exception of underburning and slash/piling projects, this limits much of the mechanical treatment options to the perimeter of the roadless area. Such treatments have little relative effect on the area's roadless nature, but can have great effect on maintaining the values already invested in on the adjacent roaded lands. (Individual, Bozeman, MT - #A28120.30500)

Recently in Kentucky, endangered red-cockaded woodpeckers had to be relocated, due to loss of habitat caused from insect infestation. The infected trees should have been cut and removed. "Protections" such as these are counter-productive. The Bankhead NF in Alabama is also becoming infested with beetles but the trees cannot be removed due to "protections" and access restrictions. I hear similar reports from members on many other national forests.

Diseases and insects will not remain confined to National Forests. They will spread into State, County, tribal and private lands just the same as wildfires spread into private lands. These blights know no boundaries. District offices should closely monitor the health of their forests and do whatever is necessary to prevent these problems. The old adage about "an ounce of prevention is worth a pound of cure" truly applies to forest health. (Organization, Three Rivers, CA - #A28739.31220)

A roadless area can be a liability as can a slum tenement building next to a home or business. The government lands should be the good example of stewardship and community, not the undesirable, unwanted, bad example of a neighbor. Do we need to cut a wide swath around each unmanaged piece of federal land to protect the citizens and adjacent communities from fire, infestations, drug crops and marauding wild animals? I hope not but ranchers, towns, private home owners and individual citizens deserve consideration in our country too. Some forms of silviculture, logging, and health maintenance can be conducted without building extensive roads, permanent roads, or banning chemical uses. Is an antibiotic bad if you have an infection in your body? Why then do we not treat our ailing forests? Balloons, helicopters, chemical spray, selective harvest, prescribed burning, basal treatments . . . there are many ways to 'manage' our roaded and unroaded or limited roaded forests with beneficial results to habitat, air and water quality, and long term value to our country. Local forest managers should know what is best for their area of responsibility, not congress. (Individual, Olympia, WA - #A26972.30100)

#### **1425. Public Concern: The Forest Service should manage roadless areas no differently than the rest of the forest.**

The Forest Service should protect the roadless areas in the same manner it protects *all* forest areas. Why should the roadless areas be any different? As far as protection from buildup of hazardous fuels, as these are roadless areas, why would there be any hazardous fuel buildup in the first place? (Individual, Monroe, GA - #A4875.30100)

Inventoried roadless areas should be subject to appropriate silviculture methods to protect from disease or insect infestation, as well as an active management program to reduce and control fuels that could feed wildfires. Ecosystem health should be a primary concern in the management of our national forests, and the best available tools to sustain forest health should be applied. Inventoried roadless areas should be subject to the same scientific management process as other areas of the forest. (Individual, Marietta, GA - #A4827.50100)

#### **1426. Public Concern: The Forest Service should not designate areas as roadless if they cannot manage those areas to keep them healthy.**

Inventoried roadless areas or any other management alternatives for public lands must allow stewardship activities like thinning and removal of hazardous fuel buildup. If roadless designation does not allow such management activities then the area should not be designated as roadless. Perhaps the best example

I can think of is the western white pine cover type. This cover type in northern Idaho and adjacent states has been reduced to about 5% of its original range due primarily to the introduction of the white pine blister rust disease. Science has produced a genetically improved blister rust-resistant tree stock. Foresters have the appropriate silvicultural techniques to ensure successful regeneration of this genetically improved stock. Much of the suitable site for this cover type is on national forest lands. Yet extensive recovery on public lands is in doubt because proper silvicultural techniques and access to these potential areas is denied due to roadless designations. For a complete analysis of this situation, I refer you to *Return of the Giants-Restoring White Pine Ecosystem* authored by a group of forestry professionals from USDA Research, Forest Service ecologists and silviculturalists and University of Idaho forestry professors. The simple truth is if you cannot manage the land to keep it healthy in a roadless designation, it should not be roadless. (Business, Colbert, WA - #A17500.30500)

**1427. Public Concern: The Forest Service should determine federal management objectives achievable by a specific roadless area.**

**BY COLLABORATING WITH THE PUBLIC AND ADHERING TO FEDERAL DESIGNATION GOALS**

Ecologically, a 'healthy' forest is subjective, in my opinion. My experience makes me believe that public land and national forest management is half sociology - you're always using the best available (but imperfect and statistically insignificant) information to work towards designated conservation goals, which are determined by the public. What's 'healthy' for nesting goshawks and spotted owls - lots of snags and blowdowns - may not produce the most timber. I believe that, realistically, this is a social more than a scientific question. I think that you should first decide federal management objectives achievable by a specific roadless forest tract - collaborating with the local community while ensuring adherence to federal designation goals. I think this process will free your ecologists to manage a forest that is 'healthy' by both local and federal definitions. Though this is kind of a complex idea, the idea is that ecologists can be freed to categorize such subjective definitions of 'healthy forests' as guiding assumptions and proceed with objective inquiry into that specified, constrained question, giving you more useful information. (Individual, New Haven, CT - #A706.30100)

**1428. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule does not preclude management actions to control insects, disease, and fire.**

The RACR has adequate flexibility and allowance for a variety of management activities. These include road construction, thinning of forest stands, prescribed fire, etc. When the primary purpose is long term protection and maintenance of IRA. Decisions on why, where, when and how to apply these tools should be focused on long term maintenance of a relatively natural forest ecosystem. The RACR does not preclude employment of management actions to control insects and diseases which may occur in IRA, nor does it preclude fire/fuel management strategies within the National Fire Plan. (Individual, Lyons, OR - #A13491.30000)

### *Adequacy of Analysis*

**1429. Public Concern: The Forest Service should evaluate forest health.**

**BY INVENTORYING CURRENT FOREST HEALTH CONDITIONS AT THE LOCAL LEVEL**

Forest health protection can best be addressed by inventorying the local current health conditions and allowing the local forester to determine the best management practices. (State Agency, Phoenix, AZ - #A17678.30100)

Forest health conditions should be inventoried at the local level so that management options can be assessed and the decisions made locally on how to address management including the use of timber removal and trail system construction to reduce wildfire risk. The resource protection methods applied in Washington and Oregon may not be suitable in the intermountain areas. Selection of "appropriate"

activities shouldn't be blanketly applied on the say so from Washington DC. (Individual, Bozeman, MT - #A19102.30100)

#### **BY CONTINUOUSLY COLLECTING FOREST HEALTH DATA**

Forest Health must be a main concern of all planning activities. Continuous data collection must occur to correctly identify any areas at risk of catastrophic wildfires, and insect and disease infestations. The forest managers as well as local communities and landowners must consider this information as the results will certainly cross boundaries and could possibly have devastating impacts on others. (Association, Kane, PA - #A6300.30100)

#### **BY CONDUCTING A FORMAL, LOCALIZED RISK ASSESSMENT OF THE CONSEQUENCES OF PROHIBITING ACTIVE FOREST HEALTH MANAGEMENT**

The flawed premise of the current roadless rule is that the prohibition of active land management will only create positive ecological consequences for our nation's policy. The fallacy of this premise lies in the overall success of our wildfire prevention policy. This 60-year-old policy has reduced the number of acres altered by wildfire nationally from 50 million acres a year to 5 million. The exclusion of fire from the ecosystem has created unnatural forests, choked with vegetation and dense undergrowth. The ecological result of these un-managed dense forests is disease, decay and potentially catastrophic wild fires that will destroy the very ecosystems that this initiative is trying to protect.

According to the Forest Service's Roadless DEIS, of the 54 million acres of inventoried roadless land in the country, 22 million acres are at moderate to high risk from catastrophic wildfire. A recent U.S. Government Accounting Office (1999) report states:

"... a serious problem related to the health of national forests ... is the overaccumulation of vegetation, which has caused an increasing number of large, intense, uncontrollable, and catastrophically destructive wildfires ... . These fires not only compromise the forests' ability to provide timber, outdoors recreation, clean water, and other resources but they also pose increasingly grave risks to human health, safety, property, and infrastructure ... ."

The members of AFRC believe that the Forest Service must conduct a formal, localized risk assessment of the consequences of prohibiting active management within these areas. This was not done in the last assessment of the roadless areas. What are the risks of wildfires and insect and disease infestation, on these and adjoining lands if no active management is undertaken? Each roadless area is unique. Forest types, stand conditions, values at risk, management objectives and the context of the area in relation to the surrounding lands are among the factors that must be considered. This argues strongly for the use of the forestland management planning process. (Association, Portland, OR - #A19004.30410)

Forest health is the most important management responsibility of the US Forest Service. Managing for Forest health includes disease prevention, reduction of catastrophic fires, stabilizing soils, wildlife enhancement, watershed and water supply improvement, and supporting rural communities. It is not known how the Roadless initiative will impact these key management responsibilities and activities. Analysis of these impacts of restricting management access to millions of acres must be comprehensive yet detailed, forest-by-forest and ranger district-by-ranger district. This has not been done yet, and this initiative should be deferred until the next round of forest planning. (Elected Official, Reserve, NM - #A15538.30100)

#### **BY COMPLETING AN INVENTORY OF ALL NATIONAL FOREST SYSTEM LANDS WITH FULL DISCLOSURE OF THE CONSEQUENCES OF VARIOUS MANAGEMENT STRATEGIES**

Full resource inventory of all lands (multiple use, roadless, and wilderness) must [be] completed and then full disclosure of the consequences of various management strategies on the forest health. (Organization, Ketchikan, AK - #A23227.13212)

#### **BY ANALYZING THE EFFECTS OF MANAGEMENT ACTIVITIES, THE NEED FOR TIMBER STAND IMPROVEMENT TREATMENTS, AND DEVELOPING A STRATEGY TO ADDRESS THE BACKLOG OF VEGETATION MANAGEMENT NEEDS**

The Forest Service would benefit from having data that analyze the relationships between the probable causes of forest stress (such as fire suppression, intensive logging followed by a substantial lack of

precommercial thinning, etc.) and the probable effects of those stressors (such as increased stand densities; increased competition for space, light, water and nutrients; increased evapotranspiration; increased insect and disease outbreaks; and increased catastrophic fire conditions. We suggest identifying the consequences of an ever-widening gap between timber stand improvement needs (2,021,000 acres in FY 2000) and timber stand improvement treatments (224,000 acres in FY 2000) and how this contributes to the current conditions and trends with respect to insects, diseases and wildfire. We also suggest developing a strategy that addresses the back log of vegetation management needs on the lands that are not suitable for timber production, which may not be accounted for in the timber stand improvement program. (Federal Agency, Washington, DC - #A28843.30100)

**1430. Public Concern: The Forest Service should use up-to-date science conservation and biology principles.**

**TO RESTORE ECOLOGICAL PROCESSES**

The management of roadless areas for forest health should use up-to-date science conservation and biology principles to restore ecological processes. To keep a forest healthy is to keep it roadless. (Individual, Santa Cruz, CA - #A15357.30100)

**1431. Public Concern: The Forest Service should protect roadless areas as a baseline to gauge the effects of management techniques on forest health in other areas.**

Insect and disease issues are largely overstated for roadless areas. Naturally occurring insects will tend to cycle between high and low levels. The rule did not prevent management with all options outside of roadless areas. There is no evidence that roadless areas are any more prone to these problems. Indeed roads have helped move diseases into Port Orford Cedar. Roadless areas also provide badly needed control areas to gauge the effectiveness of management techniques on other lands. The need to control costs would suggest that we critically evaluate the effectiveness of various techniques. Without control areas free of manipulation, no scientific estimate of their validity can be made. (Organization, Missoula, MT - #A26424.31210)

Roadless areas provide a baseline for judging the impacts of more intense land-use activities on multiple use lands.

Because roadless areas in the Southern Rockies and elsewhere provide examples of ecologically healthy landscapes, they provide important opportunities to gauge the health of lands being managed primarily for resource extraction and more intense levels of use. Without roadless areas, there is no reliable ecological baseline to compare the relative health of our more intensely used lands. Thus, roadless areas are an invaluable tool for land and resource managers, helping to ensure the health of all our public lands. Providing this baseline, however, requires protecting a substantial amount of roadless lands in all ecosystem types found on the national forests, as a variety of ecosystem types occur across our national forests. (Organization, Denver, CO - #A21367.30100)

**1432. Public Concern: The Forest Service should consider that our infrastructure programs, budgets, and knowledge of the best way to deal with forest health concerns are rudimentary.**

Nationally, fuels buildup and forest health are vital concerns, but our infrastructure programs, budgets and even our knowledge of the best way to deal with them are still rudimentary. Luckily, aerial and satellite based remote sensing, together with on-ground sampling and truthing, provide a way to monitor roadless areas as well as roaded areas—better than simply by sampling from roads.

It is possible that “roadless” status is not an irrevocable classification for future generations, but for now roaded area acres are more than ample to strain all existing budgets manpower and equipment, and to try out a variety of treatment methods—to explore their costs and benefits and to compare results against the “control group” of unroaded acreage. It makes no sense to modify “roadless” designations now on the basis of these concerns, until these concerns are already adequately addressed on all roaded acreage.

Once the Forest Service has been given a more than adequate budget to deal with all areas, and once it has accumulated sufficient practical experience applying management methods and well understands their advantages and limitations, then it will be in a position to recommend any changes that should be made to roadless area management. That is knowledge we don't now have. (Individual, Spokane, WA - #A20648.30100)

**1433. Public Concern: The Forest Service should define and publicize the forest health risks that will result from roadless designation.**

**TO ADJACENT PRIVATE AND STATE LANDS**

**All roadless areas should be managed under a local forest plan.** Such plans can best provide for healthy forests while protecting adjoining lands from wildfires and the spread of disease. Areas designated as roadless pose a higher risk for disease and wildfire because roads are not available but are necessary for many management techniques required to ensure forest health. If the USFS determines that keeping an area roadless is worth the risk to adjacent private and State lands, then it must define and publicize the risks that will result. In the Chugach National Forest of Southcentral Alaska the USFS has failed miserably in controlling a major infestation of the spruce bark beetle, even though they had the authority to control the problem. If the roadless rule had been in place it would have been totally impossible. Today these areas, as well as adjacent state and private lands are at tremendous risk to wildfire. (Association, Anchorage, AK - #A23255.30600)

**1434. Public Concern: The Forest Service should provide scientific data to support the claim that a national roadless rule will have a positive effect on fire and insect management.**

The proposed rulemaking and policy indicates a belief that its adoption would have a positive effect on fire and forest pest management, but offers no scientific data to support this determination. Without a road system to support ecosystem management, timber harvesting to create wildlife habitat, salvage logging of dead and dying timber to remove fuel loading, sanitation harvesting to control insect and disease epidemics, thinning to achieve the desired number of trees, and reforestation projects all become largely uneconomic. Forest health will continue to decline in non-roaded areas without management, and fuel buildups will increase without mechanical removal of the material. It is time to group Forest Service priorities: the National Fire Plan addresses some of these same topics proactively while the Roadless Area Conservation proposal effectively ignores the need for management where conflagrations are likely. (Professional Society, Anchorage, AK - #A21707.30100)

**1435. Public Concern: The Forest Service should provide empirical studies to support the claim that thinning small-diameter trees will restore ecological processes, provide habitat for endangered species, and avert catastrophic wildfire.**

**BECAUSE OTHERWISE, LOCAL EMPLOYEES MAY EXPLOIT AREAS IN THE NAME OF FOREST HEALTH**

While the rule also gives local forest managers discretion, on a site-specific basis, to thin small-diameter trees where needed to restore ecological processes, provide habitat for endangered species, and avert catastrophic wildfire—we know of no empirical studies that prove this works. Allowing this discretion is a loophole that some Rangers are already exploiting in the name of “forest health.”

The best way to maintain healthy roadless areas is to keep them roadless. According to the Forest Service, less than 2% of the inventoried roadless areas are at combined risk of insects, disease, and fire. Wildfires are much more likely to start in areas with roads, due to increased public access. The Forest Service has successfully controlled 98% of wildfires in inventoried roadless areas without building roads into these pristine forests. (Business, Spokane, WA - #A22047.30100)

**1436. Public Concern: The Forest Service should bring together a bi-partisan group to discuss forest management tools and to make science-based recommendations.**

**FOR FOREST HEALTH**

At the recent Governors' Conference, the pact for massive thinning promulgated by the Dept. of Interior and Dept. of Agriculture is cause for grave concern. How will this thinning be done? By helicopter? If not, how many miles of new logging roads will be required?

Whether or not, lightning will strike and forests will burn.

If all the underbrush is removed, what happens to the many creatures and plants, including endangered species, whose habitat is destroyed?

Before embarking on a costly and potentially destructive program, wouldn't it make sense to bring together a bi-partisan group of knowledgeable persons to discuss what works best and what works less well and to make science-based recommendations? This Forest Service planning process is reportedly done for the next 10 years. Why is a policy not considered to maintain healthy, sustainable forests for the next 50-100 years? (Individual, Berkeley, CA - #A5762.30100)

**1437. Public Concern: The Forest Service should allow staff scientists to make recommendations about forest health and other situations, and then allow the general public to comment on those recommendations.**

The Forest Service has many outstanding scientists on staff whose job should be to make such recommendations as these forest health and others as situations arise. The general public can then comment on these recommendations. (Individual, Grayson, KY - #A16450.30100)

*Adequacy of Analysis – Concepts*

**1438. Public Concern: The Forest Service should define “healthy.”**

**AS THE MEANING MAY VARY ACCORDING TO AN INDUSTRIAL OR AN ECOLOGICAL PERSPECTIVE**

“Healthy” is a subjective term. A tree farm may be “healthy” from the view of lumber production, but not by environmental measures. With one exception [Footnote 1: White pine blister rust was introduced by the timber industry from seedlings grown in Europe in the 1920s.] the insects and diseases of Northern Rocky Mountain forests are indigenous. Their abundance waxes and wanes with climatic or stand conditions. For example, bark beetles attack trees such as lodgepole when tree diameter exceeds eight inches, and may become widespread in older even-aged stands, especially following drought or widespread blow down. This is a natural event. Is it unhealthy? Little can be done to prevent it except to remove (i.e., log) the susceptible trees. Is this the answer you are seeking? Beetle killed trees may form large areas of “standing dead”, highly fire susceptible trees. In the natural course of events, e.g., Yellowstone in 1988, forest fires occur and following that a new stand regenerates, relatively immune from beetle attack for the next half century or more. Is this unhealthy? (Individual, Lolo, MT - #A111.31200)

First, we must define a healthy forest. Healthy according to whom? The author's definition of a healthy forest is one with reduced fires, reduced fuels, reduced insect attacks and reduced disease attacks. This is so incorrect ecologically. Fires (even severe ones), insects and diseases are all natural elements that the forest and its animals, birds, fish inhabitants have evolved with and need.

The only reason for reducing severe fire, insects and disease is to increase the value of trees that would be milled into boards. This may be quite important on industry owned lands, but must not be a prime motivator on National Forest managed lands. (Individual, Grangeville, ID - #A830.30130)

This is the old forest service speaking, the agency which has had to swallow bitter pills in courts of law due to outmoded science and thinking. We need serious discussion on how to define a “healthy forest”.

Many of us would opt for throwing out the term completely and replace it with ecological integrity. My particular efforts are to bring people together around the principles of conservation biology which addresses “forest health” through issues related to biodiversity. Landscape ecology is also an excellent new way of looking at forest management and a forest in Oregon has done some pioneer work. (Association, No Address - #A8392.30100)

**AS THE MEANING MAY VARY ACCORDING TO MANAGEMENT OBJECTIVES ON EACH SITE**

Forest “health” is an enigmatic and meaningless term; the definition varies according to management objectives on each site. Whatever it may mean, we do not need roads to conserve diverse forests that support wildlife and other values. (Individual, West Glacier, MT - #A5946.30000)

Your question on “healthy forests”, implies that fire, insects and diseases are undesired or rare elements in a forest ecosystem. These things occur everywhere on the forest, not just in roadless areas. The use of the term “healthy forest” is an unscientific term which has been concocted to exploit a political end - the commercial logging of public forests. Natural processes are not unhealthy when viewed over the long term. The F.S. should concentrate on preserving roadless areas as naturally functioning ecosystems and concentrate on the remainder of the forest for experiments on managing forests. (Individual, Great Falls, MT - #A13329.30000)

How can forest health be a factor when the standards by which forest health is gauged is not agreed upon? Biologists; opinions on what constitutes a healthy forest vary; when credentials are comparable and recommendations differ, how can the decision-making individuals at the Forest Service decide who is correct? The idea of forest fires and bug infestations as indicative of an unhealthy forest is illogical and unproven, and rather should be seen as a necessary and inevitable part of nature. Look to history: our western forests have existed and thrived for thousands of years without Forest Service “management” and should be left to continue to do so. In hindsight, most “management” of ecosystems result in disaster and cost taxpayer dollars to fix. In Montana, planted lake trout destroyed the salmon fisheries, which in turn eliminated a main food source for bald eagles -- we now plant thousands of salmon fry a year to try and repopulate fisheries; channeled streams and rivers have resulted in severe flooding—we now are returning some to their original flow in order to combat flooding; logging in steep federal-forested drainages has resulted in silt contaminating the streams in which bull trout reside, facilitating their endangered status—we are still fighting on how best to boost the fish population; roads constructed on federal land in grizzly habitat has resulted in human and motorized vehicle access which directly contributed to the deaths of several grizzlies within the last year which will keep them on the endangered list even longer. My point is that every time humans go in and “manage” something, it produces eventual negative consequences which ultimately need to be fixed with lots of tax dollars. The time is long overdue for a hands-off management policy. Leave them alone and the forests will thrive as they always have. (Individual, Kalispell, MT - #A26974.30100)

**1439. Public Concern: The Forest Service should go beyond the traditional concept of “healthy forests” to embrace the concept of healthy ecosystems and natural processes.**

We had hoped that the Forest Service had gotten beyond the traditional concept of “healthy forests” to embrace the concept of *healthy ecosystems* and *natural processes*. After all, you are not managing a tree farm but an incredibly complex system which may be better left to its own destiny. At any rate, it can be shown by the agency’s own research that roadless areas have more biological diversity and a wider range of habitats than roaded areas, and thus may be deemed *healthier* than Forest Service lands with roads. Roads don’t help much with anything but the management of *trees*, and makes the management of motorized recreation all the more difficult, if not impossible. (Organization, Vernal, UT - #A29144.30100)

**1440. Public Concern: The Forest Service should measure forest health in terms of clean water, biodiversity, and solitude.**

The forest health and wildfire arguments raised by the timber industry are red herrings. The forest fires in the western United States have burned predominately in roaded and logged areas and “forest health” should be measured by more than just the board feet a given acre can produce. Measured in terms of clean water, biodiversity and solitude, our roadless areas are the healthiest forests remaining. (Organization, Bozeman, MT - #A20515.30100)

**1441. Public Concern: The Forest Service should define temporary and short-term treatments.**

A variety of methods and techniques will be needed and some or all may or may not be allowed in them depending on the management goals and objectives. Thus some IRAs may allow some road and trail construction to facilitate management treatments for temporary or short-term projects. Definitions of temporary or short-term should be included, such as 18 months for temporary and 5 for short-term. These options will allow for treatments that treat fuel build-up, insect and or disease problems or potential problems. There should be a standard that these words would not be open for general public use during the life of their use. (Individual, Missoula, MT - #A28297.30120)

**1442. Public Concern: The Forest Service should acknowledge the concept of natural disturbance regimes.**

Wildfires, insects and disease are natural mechanisms that act across landscape scales to sustain a healthy mix of forest successional stages fostering high biodiversity and providing a variety of important habitats for the forest’s many plants and animals. The build-up of “hazardous fuels” mentioned in the question is a simplistic description of the manifestation of decades of fire suppression. It is not a widespread phenomenon in natural forest ecosystems but a symptom of expanding human settlement into forested landscapes. It annoys me to think that professional foresters employed by the federal government do not acknowledge the concept of natural disturbance regimes, a concept taught in any high school biology class. (Individual, No Address - #A27789.30100)

A very critical aspect that in the past has not been considered in doing this analysis is the temporal variation that occurs in ecosystems. Therefore the conditions now AND in the future, need to be put in the context of the disturbance regimes that are associated with the ecosystems being managed. (Individual, Missoula, MT - #A28297.30110)

*Funding***1443. Public Concern: The Forest Service should consider that policy changes, and attendant litigation, have cost a great deal of money that could have gone to forest health treatments.**

The issue of Forest Management has been controversial for years. The present changes in the ‘Management Planning Regulations’, the ‘Road Management Policy’, and this ‘Roadless Area Conservation Rule’ have been initiated by emotions, with political pressure, and have not been based on scientific data. I would be very interested to know how many areas that burned in 2000 and 2001 had litigation that prevented or delayed needed treatments designed to promote forest health. The extensive loss of natural resources in these burn areas will manifest themselves far into the future. The money spent on litigation, in the last 10 years alone, could have been put to a greater use with management activities on the ground. The error ridden Roadless Conservation Rule cost \$9.4 million to compile. The money could have provided much needed fuel load reductions and prevented much of the devastation by the last 2 years of catastrophic wildfires. (Individual, Centerfield, UT - #A30440.20000)

**1444. Public Concern: The Forest Service should hold litigants responsible for the damages caused by their lawsuits that prevent forest health treatment or management activities.**

**BECAUSE MANAGEMENT OF NATIONAL FORESTS WILL CONTINUE TO BE STIFLED, FURTHER EXACERBATING FOREST HEALTH**

I would like to see litigants be held responsible for damages caused by their lawsuits preventing treatment/management activities aimed at restoring forest health, controlling insect and disease outbreaks, and the destruction of watersheds. Until litigants are held accountable for the misrepresentation of facts, management of our National Forests will continue to be stifled, which further exacerbates the declining health of our National Forests. (Individual, Centerfield, UT - #A30440.30100)

*Active Management*

**1445. Public Concern: The Forest Service should actively manage natural resources in roadless areas.**

**BY EVALUATING PRACTICES IN OTHER STATES**

View every state and see what they are doing and what is working and what is not. Again, South Carolina seems to have a good plan in place. Evaluate our practices and see if they will work in other areas. Keep in mind that the local forest planners may have ideas that work in their areas. Actively managing our forest with prescribed burns, thinning or cutting should eliminate most problems if done in a timely, thought-out manner. (Individual, No Address - #A57.30000)

**BY USING INFORMATION FROM ITS EXTENSIVE DATABASE ON WILDFIRE AND INSECT RISK AND ELEMENTS FROM THE NATIONAL FIRE PLAN**

The Forest Service currently has an extensive database on the risk of wildfire and insects infestations on national forest lands. Local forest planning processes should utilize this information and the elements of the National Fire Plan to increase activities that will protect forests from severe wildfires. These lands should be actively managed and full range of options including mechanical treatment and timber removal to protect and maintain desired conditions. (Association, Boise, ID - #A17232.30500)

**BY CONSIDERING THE SITE-SPECIFIC CHARACTERISTICS OF EACH FORESTED AREA**

The management of Roadless or any other areas of the National Forests to provide for "healthy forests" depends on the characteristics of the specific forest area under consideration. An old growth Douglas fir stand that is considered prime habitat for the northern spotted owl and other old growth dependent wildlife species contains large quantities of dead, dying and "defective" trees but is healthy. In contrast a 20-30 year old Douglas fir stand that is being managed for timber production may be considered "unhealthy" if it is overstocked or infested with insects that will in time result in the death of some of the trees which will become fuel for wildfires or breeding sites for woodpeckers. (Individual, Olympia, WA - #A278.30100)

Protecting forests: Management of inventoried roadless areas to provide for healthy forests should vary depending on the type of forest. For example, in forest systems characterized by frequent low intensity fires (e.g., Ponderosa pine forests throughout the West, Sequoia forests of California's Sierra Nevada), thinning of small (<10 inch dbh) trees and brush removal should be conducted to prevent catastrophic high intensity fires that result in extensive mortality of large (> 12 inch dbh) trees. Such activity will also prevent the spread of many insects that can kill mature trees and increase the danger of catastrophic fires in systems whose species are not adapted to them. Thinning activities should be conducted first in the urban interface zone, but later in more remote areas. Rather than construct roads to access remote areas, crews should land by air or travel by foot and leave cut trees in place, in piles, for controlled burns. I have observed such management on the White Mountain Apache Reservation within Arizona, perhaps the best management of ponderosa pine forests that I have ever seen. (Individual, Davis, CA - #A30523.30531)

It depends on the forest and where it is. It is not realistic to manage a lodgepole forest in Montana in the same manner as a redwood forest in California. As for the forests in Montana, the dead and dying trees should be removed and used. The waste should be chipped. Fires are unacceptable as they are too dangerous and cause too much air and water pollution. This pollution detracts from our local and statewide tourist industry. (Individual, Columbia Falls, MT - #A29651.30100)

There is no “one” answer as to how IRA’s should be managed, since every roadless area is a distinct and unique unit. The diversity of factors that must be addressed in managing roadless areas is profound. Forest types, stand conditions, values at risk, management objectives and the context of the area in relation to the surrounding lands are among the factors that must be considered. Consequently, each IRA should be managed individually.

Since the agency must preserve the IRA in the condition it was as of the date of the designation as a Roadless Area, any activities that significantly alter the condition of the IRA at the time of designations are prohibited. The agency should conduct forest health projects, including but not limited to timber harvest, in order to preserve the condition of the area at the time of designation.

It is unwise for the agency to let national initiative eliminate effective tools for preserving the conditions of IRA’s as well as managing other areas of the forest. (Organization, Lakeside, CA - #A29963.30100)

#### **BY ACTIVELY MANAGING TO CONTROL INSECTS, DISEASE, AND FIRE**

We of the western states have long realized that to do nothing is not an acceptable approach to keeping a forest healthy. As I see new fires starting up in the yearly fire season I can’t help but wonder why someone would so passionately fight for a forest then to tie the hands of the people that are trying to ensure its health. We have a park here that was privately donated near Tensed, Idaho that is being hit by the tussock moth the state has tried to control them with pesticides but now we are aggressively but responsibly logging the diseased trees to prevent a major fire that would consume the entire park and possibly a couple of towns. (Individual, Saint Maries, ID - #A1727.30100)

How on earth can the Forest Service ever consider that by letting a forest go by the wayside in favor of not managing timber harvest, if for no other reason eliminating decadent timber stands which create fire hazards, fail to manage a beetle outbreak on a community watershed, etc., as protecting communities, homes and property? This in favor of creating a de facto wilderness called a roadless area. As forest professionals, you know and we know, that this practice of designating large roadless areas is not in the best interest of managing for improved watersheds, lowering fire danger, and in general providing for good forest health. (Elected Official, Monticello, UT - #A4890.10112)

It must be decided how each roadless unit is to be managed in the long run. Units proposed for wilderness will have an entirely different set of constraints than those to be managed for multiple uses and roaded. Maintaining the health of surrounding forest lands and protection of private property is paramount. Harvest of forest products for fuel reduction and forest health is an option in many cases. Modern equipment can often remove high-risk material without roads. Few roads are needed to accommodate harvest today. Also, managing roadless areas to retain their roadless character does not preclude the use of managed fire or application of chemicals for insect control. (Individual, Lewiston, ID - #A2872.30100)

I am writing to say we need to change the Roadless Area Conservation Rules. If we do not revise the Roadless Policy, it will have a very negative affect on Lake County and the rest of Northern Minnesota. Some of the reasons are:

1. The amount of forest managed for forest health has decreased by close to 50 percent over the last few years. The rules will increase the negative affect of no management.
2. Lake County’s land base is currently about 58 percent federally owned, and about one million acres of our area is in the BWCAW. We also have a huge amount of specially classified area spread across Northeast Minnesota.

3. In the July 4th storm a couple of years ago, 400,000 acres of forest blew down. Because of the lack of forest management, the loss was greater than it needed to be. (Elected Official, Two Harbors, MN - #A18049.30100)

Native Americans treated, predominately with fire, the country they habituated. There were prairie fires, meadow grass fires as they left the high country in the fall of the year, thinning of the forests by fire for better hunting practices and to regenerate forage for the upcoming season. Fire cycles and fire intensity are escalating under contemporary conditions which have eliminated the cycles that most of our North American landscapes have evolved with. Circumstances require more human involvement, not less. The history and study of natural resources management reveal that the greater task in settling "management" issues is to resolve the political side of the equation. Start with communities and build an ecologically sound vision that can be supported. Start from the ground up. (Individual, Elko, NV - #A23651.30400)

#### **BY TAKING SPECIFIC AREAS OUT OF ROADLESS DESIGNATION TO MINIMIZE INSECTS, DISEASE, AND FIRE**

Protecting Forests - How should inventoried roadless areas be managed to provide for healthy forests, including protection from severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreaks?

You must already know this but you cannot have both roadless areas and healthy forests. It is just not possible. The only logical and sane response to this question is that you, the USFS, identify those areas of the forest that are worth managing for the future and take them out of the roadless category. Then you can perform the necessary sanitation logging and pre-disaster thinning that most of these stands so desperately need in order to minimize the impacts of insect, disease and wildfire. (Individual, Montrose, CO - #A370.30100)

#### **BY ALLOWING THE RESPONSIBLE HARVEST OF TREES AND WILDLIFE**

I believe that the Clinton-Gore roadless plan is basically flawed. In denying public access to wildlife areas and areas of forestation, it has already resulted in rampant wildfires in the western U.S. as well as booms in certain populations of wildlife that has resulted in diseases and starvation due to overpopulations.

I believe that responsible harvesting of wildlife and logging, results in a healthier wildlife population and less likelihood of diseased and weak trees due to competition with underbrush. Even the news media in the western parts of the U.S. are questioning the wisdom of the roadless plan. (Individual, No Address - #A6805.30100)

#### **BY CLEANING UP WOODY DEBRIS**

We are truly insulted by the lack of resolve the Forest Service has in fighting for their right and job to husband and nurture our forest in the manner that they deserve. We get daily reminders of how to protect our houses and ranches from wildfires by picking up excess debris scattered about or left laying by the buildings and other "safety habits" but the Forest Service is letting itself be forced into "a do nothing" and "let it burn" attitude by a bunch of idiots who don't give a rip about anything but their own outlook . . . most of these people have not a clue of "reality". For centuries animals have used caves for nests and dens . . . why in the world would you have to leave a bunch of dry debris all about for the same purpose? We also have so many imported bugs and viruses now established by our country's quest for "more goods" that any "native" ones from 100 years ago . . . for gosh sakes, anyone with a lick of sense would know that trash breeds bacteria and if you don't "clean your house" you are inviting bugs, virus, and bacteria. (Individual, Mazama, WA - #A757.30100)

#### **BY RELYING ON ACCESS OTHER THAN ROADS**

No additional roads should be built. Wildfires should be strongly suppressed. Controlled burns should be encouraged. If mandated by threat of disease some selective helicopter logging should be allowed as long as the sale pays for itself in full. (Individual, Kalispell, MT - #A97.30100)

These protected forests could be managed by hand thinning, understory burning or helicopter thinning/logging, but NO roads. (Individual, No Address - #A101.30100)

The issue of Forest Protection is the same whether the forest is roadless or not. There are ways to deal with roadless areas. How are they being handled now? Disease can be treated in various ways, such as from the air or over land. Wildfire protection is somewhat overblown. Treat the fringes of the roadless areas by thinning, therefore rendering wildfire problems less of a hazard. Building roads will not reduce the possibility of wildfire. Roads make for easy access for the public and make the possibility of wildfire greater. (Individual, Coulterville, IL - #A114.30000)

Roadless areas should remain so. In general, they are roadless now because building roads and harvesting timber has not made and does not make economic and environmental sense. If forest managers determine that fuel reduction or remediation of insect infestation is truly necessary, then aerial extraction should be used rather than building roads. (Individual, Bozeman, MT - #A1134.30200)

Some fuel reduction around developments and prescribed burning other areas are acceptable management strategies in roadless areas as long as NO ROADS ARE CONSTRUCTED. (Individual, Ennis, MT - #A2249.30100)

#### **BY WORKING WITH STATE AND LOCAL GOVERNMENTS TO ACTIVELY IMPROVE FORESTS AND RANGELANDS**

Roadless area supporters argue that the best way to maintain healthy roadless areas is to keep them roadless. This may be the case for the temperate forests; however, in the arid west accelerating drought conditions combined with an explosion of invasive weeds, insect damage, and catastrophic wildland fires have created a potentially devastating environment. We feel strongly that a blanket ban on road building in inventoried roadless areas will undermine ongoing efforts to reduce fuels, implement site-specific fire suppression, control weeds, and monitor forest/rangeland health. The most likely outcome of such a ban is continued long-term resource deterioration punctuated by catastrophic and perhaps irreparable damage by fire, erosion and weed infestation. Land management agencies must be mandated to work with state and local governments to actively improve our forests and rangelands even if the improvements require access into inventoried roadless areas. (Elected Official, Eureka County, NV - #A20741.30100)

#### **BECAUSE UNMANAGED LANDS AND WILDLIFE WILL SUFFER**

It has been proven time and again that lands and wildlife left to, supposedly, their own will not prosper but will suffer. Whether we like it or not, the mere fact that we are living on this planet affects all life. As such it is impossible for that life to just be left totally alone. (Individual, Speedway, IN - #A3928.30000)

### **1446. Public Concern: The Forest Service should allow helicopters in roadless areas.**

#### **TO HARVEST DEAD TREES AND FUELS OR TO PILE AND BURN**

In true roadless areas, use helicopters to remove dead trees/fuels, or pile and burn seasonally during the winter. Most private property owners do. (Individual, Prairie City, OR - #A15474.30550)

## *Ecosystem/Restoration Management*

### **1447. Public Concern: The Forest Service should utilize best management practices.**

#### **TO REDUCE THE RISK OF CATASTROPHIC EVENTS**

Agencies must utilize best management practices to reduce the risk of catastrophic events. The Agencies should never start fires on windy days, and vertically mulch routes as part of fire restoration projects! (Individual, Santa Ysabel, CA - #A26392.30100)

**1448. Public Concern: The Forest Service should restore forest health.**

The first consideration of inventoried roadless areas must be the need to restore forest health. Rules governing management of roadless areas must permit restoration. Following restoration, rules governing management must consider realistic methods essential to the long-term protection of the roadless areas. Roadless areas must be distinguished from wilderness areas and must provide the broadest methods appropriate for forest health protection, including timber removal. (Association, Sacramento, CA - #A22614.30100)

**1449. Public Concern: The Forest Service should recognize that forest health does not require the destruction of old growth vegetation.**

The roadless rule will help protect older forest structural stages on a national level. In my experience, rarely does ecosystem health actually mandate the consumption of the oldest structural stages of vegetation. That type of consumption, in my region, is conducted more for economic and political reasons than ecosystem health, in my opinion. Some analysis using varying scales can portray forest stands that have high percentages of mature structural stages in certain watersheds. However, if the values of those forests that are lost are looked at in a national scope overall, there is still a large deficit in older forest structural stages. (Individual, Penrose, CO - #A21448.60120)

**1450. Public Concern: The Forest Service should use conditions that existed just prior to Euro-American contact as a baseline for management.****TO AVOID UNFORESEEN AND NEGATIVE CONSEQUENCES**

Certainly Native Americans “managed” ecosystems to some extent too. It is also true that ecosystems are dynamic, making establishment of “baseline ecosystem conditions” somewhat arbitrary. Nevertheless, the need for establishing baseline conditions that existed prior to intensive, mechanized, large-scale forest management is indisputable - ecosystems are simply too complex for us to ever intensively “manage” over large areas and timescales without unforeseen and often negative consequences. The best we can hope for is to tinker intelligently, at relatively small scales, guided by ecosystems’ range of natural variability rather than the “nature as machine to serve humans” metaphor. This requires some knowledge of what that range of variability is, and establishing some kind of baseline reference conditions. Conditions that existed just prior to Euro-American contact are as good as any to serve as this baseline, and are the most likely to be discernable by scientists. (Individual, Corvallis, OR - #A650.30110)

**1451. Public Concern: The Forest Service should consider that permitting states and local jurisdictions to develop lands adjacent to national forests interferes with natural forest health processes.**

Natural processes should determine the health of forests in roadless areas. In the long run, nature itself has proven to be the best manager. It is when man tampers with the natural process of destruction and rejuvenation that causes the greatest problems in forest management. For example, permitting states and local jurisdictions to develop lands adjacent to national forests interferes with these natural processes. In the end, the Forest Service spends large sums of taxpayer dollars to fight fires that should burn naturally and insect and disease outbreaks, which are many times imported by adjacent developments. (Individual, No Address - #A9085.30100)

**1452. Public Concern: The Forest Service should replant burned or cut timber areas.**

We must protect our natural forest resources here in Oregon. I feel bad every time there is a forest fire! There needs to be replanting of burned or cut timber areas. (Individual, Turner, OR - #A14537.31100)

**1453. Public Concern: The Forest Service should find a variety of low-resource using, non-polluting alternatives to road-based management practices.**

I'm sure there are a variety of low-resource using, non-polluting alternatives to road-based management practices. Electric battery-powered lightweight ATVs strike me as one possibility. These, in conjunction with a series of micro-footprint observation stations, satellite monitoring, and other techniques, should enable you to maintain sound management practices. Try some Yankee ingenuity. (Individual, Chestertown, MD - #A462.30400)

***Ecosystem/Restoration Management – Roadless Areas*****1454. Public Concern: The Forest Service should protect roadless areas.****BECAUSE ONCE AREAS ARE ROADED, THEY ARE EXTREMELY DIFFICULT TO RESTORE**

Roadless areas must remain roadless! It is extremely hard to restore lands to their preroaded condition. I have an MS in forestry and I never had such an idea proposed to me in any of the forestry classes I have taken. We simply do not know how to practice restoration so completely and the problems caused by roading are extremely difficult to deal with. For proof of this just look at the spread of exotic plant species along roadsides and the millions of dollars we are spending nationally to combat this issue. (Individual, Sandpoint, ID - #A28585.30110)

**1455. Public Concern: The Forest Service should not actively manage natural resources in roadless areas.****ALLOW NATURAL ECOSYSTEM PROCESSES TO OPERATE**

Inventoried roadless areas should be left alone. There is no need to “manage” natural forests. If there is a fire, let it burn. Let the forest deal on their own with insects and diseases. The forest managed on their own for millions of years without the assistance of the Forest Service, and there is no reason to think that evolutionary defenses are anything but the most appropriate for our national forests today. (Individual, New Haven, CT - #A616.30000)

We all know the forest health issue is overblown by the timber industry and some Forest Service employees. Even in areas where fuels are at higher levels than average and fires are imminent, I would much rather see the forests burn (even hot, stand replacing burns) than see them roaded and logged. Nature has learned to evolve with and actually depend on natural events such as fire and insects. Nature simply does not handle the constant press disturbances associated with roading, logging and mining.

Not all trees are, or should be healthy. A healthy population of anything depends on some sick and dying individuals. Dead trees make new dirt and are excellent habitat for some birds. Most dead trees do not belong in the mill. (Individual, Grangeville, ID - #A830.30000)

Roadless forest areas should be managed as natural areas and with natural processes permitted to shape the forest. Naturally caused fires should be permitted to burn and only man-caused fires should be considered for human intervention. The same applies to disease. Fire and disease are natural processes. The problem right now, it seems to me, is that we insist on viewing the state of any particular forest in terms of short-term periods (as in our lifetimes) instead of dynamic systems that shape themselves over hundreds and thousands of years. Put another way, what happens to a forest, or how it looks during the next ten years is not important. What is important is what it will look like in a hundred years, or five hundred years. (Individual, Billings, MT - #A277.30100)

Forests managed to do just fine for millions of years without human intervention. Humans entered the Americas only some 15,000 years ago, the blink of an eye in evolutionary terms. The notion that forests now require human cossetting with chainsaws and bulldozers is absurd, and true only to the extent that remediation of the effects of abusive human activities (logging, grazing, mining, road building) and

excessive fire suppression is necessary. Thus, cessation of the activities just mentioned, closure and obliteration of cherry stem roads, stream and stream bank restoration, use of prescribed fire and mechanical thinning of dense, fire-prone reproduction (not mature, fire resistant trees) created by logging or overzealous fire suppression, eradication of invasive exotic species, and any other measures which may be useful in keeping roadless areas in a natural state, or returning them to that state, all should be funded and initiated fully and immediately. (Individual, Dallas, OR - #A3697.90110)

**Question #A 3:** All roadless areas should be managed to retain their natural ecosystem characteristics and processes to protect their potential to be included in the Wilderness Area system of the National Forest. Therefore, we feel that wildfires should be allowed to burn and insect and disease outbreaks should be allowed to run their course. Healthy forests, as defined by us, include all of these native disturbance components which contribute diversity to a native forest. (Individual, Nine Mile Falls, WA - #A15241.30100)

This question displays an alarming lack of comprehension of even the most basic principles of forest ecosystems and an absolute failure to understand the underlying rationale for the roadless rule. Roadless areas need no management at all! The whole reason we are trying to protect roadless areas is to allow those areas to behave in a natural way. Periodic fires are natural. Without any management at all, these areas will quickly revert to a natural cycle of burn and rebirth. The excessive underbrush that is the result of past management practices will disappear and the severe crown fires that many areas now experience will diminish rapidly. Insect and disease outbreaks are also natural. The severity of these outbreaks is also a result of forest management practices. The natural environment contains predators that keep disease/pest populations in check. The term management, in this instance, is another excuse to allow extractive industries to thwart the will of the people. No management of these areas is required. (Individual, Denver, CO - #A12861.30000)

#### **REMOVE BARRIERS TO NATURAL PROCESSES**

Most forests that are unhealthy have become that way because of the arrogance of the US Forest Service. Fire suppression has caused some buildup of hazardous fuels, but grazing and the introduction of non-native species have also increased problems with the health of our forests. Roadless areas should be managed to allow natural processes to dominate the landscape, allowing these to determine what a “healthy forest” is. The Forest Service can remove barriers to natural process by:

- 1) Removing cattle from roadless areas
- 2) Prohibit the use of motorized vehicles in roadless areas
- 3) Monitoring and removing non-native invasive species (native pets are OK)
- 4) Stop suppressing fires unless they imminently threaten adjacent private property. (Individual, Takoma Park, MD - #A16325.30100)

#### **BECAUSE OF THE LACK OF FUNDING**

Our forests are stressed from past management practices, logging, road building, weed introductions, pest distributions, fragmentation, genetic isolation. We don’t have enough federal funding to “take care of every tree”, so it is imperative that we limit the amount of contact we have with the forests. When there was more acreage of forest lands [we] could afford to lose parts to fire and pests and still have “adequate margins of safety” regarding their health. (Individual, No Address - #A17946.30100)

### **1456. Public Concern: The Forest Service should restore roadless areas damaged by past management practices.**

#### **BY ALLOWING NATURAL PROCESSES TO OPERATE**

Wild forests do not need to be managed, except to overcome the damage that past “management” has caused. This means that we should consider the option of removing brush undergrowth, but then should allow wildfires to occur when naturally caused. (Individual, Norwalk, CT - #A884.30100)

The whole point of a Roadless Area is maintaining the natural status quo. Therefore, natural forces should be allowed to work in these areas, if there is no immediate danger to human life or property. Fires, insects, and diseases are natural forces, unless human-induced. If these agents are human-induced, a careful but speedy evaluation of the pros and cons of preventative management should occur prior to action. (Individual, Astoria, OR - #A476.30000)

Very few roadless areas have been logged or otherwise intensively “managed”. Many are high altitude and not particularly fire prone. Moreover, fire is an important component of many forest ecosystems and fire suppression has caused more problems than it has solved — witness the dangerously high fuel levels in many “managed” areas, and the fires of the past couple of years in the intermountain west. The USFS has many years of work ahead of it just to get fuel levels in areas that already contain roads back within their natural range of variability. There is also much work to be done to restore some semblance of variability in stand structure and species composition in even aged, single species second and third growth areas. The USFS should concentrate on these areas, rather than promote disingenuous arguments that roadless areas need to be actively “managed”.

Any exceptions to these general conclusions can be handled on a case by case basis, under the NEPA EIS process, with careful review from ecologists who are allowed to conduct their work without political pressure from extractive interests. (Individual, Corvallis, OR - #A650.30310)

#### TO IMPROVE FOREST HEALTH

Again I would agree with the Roadless Plan which provides for road construction or reconstruction as needed to protect public health and safety. The Plan also allows access for thinning to reduce wildfire risk or restore the ecosystem. Building a road does not solve fire, insect or disease outbreaks. In fact building roads into roadless areas actually increases fire risk as well as the transport of noxious weeds and pests. In addition, previous logging practices of removing large old growth trees and clearcutting has resulted in forests which are more susceptible to severe wildfire and insect and disease damage. Restoration activities should be undertaken to improve forest health. (Individual, Ethel, WA - #A11767.30100)

#### **1457. Public Concern: The Forest Service should close loopholes in the Roadless Area Conservation Rule for stewardship logging and fire suppression.**

You must keep the roadless policy, as signed in January 2001. In fact, if anything, you should be making this policy stronger, closing loopholes created for stewardship logging and bogus fire suppression activities. (Individual, Seattle, WA - #A84.10150)

Suffice it to say: the Roadless Initiative, should be accepted—as over a million people have already clearly stated—with the full 58.5 million acres of roadless lands protected from logging and mining. Regarding our roadless national forest lands: NO NEW ROADS SHOULD BE BUILT PERIOD! Is that clear? If not, let me repeat it: NO NEW ROADS SHOULD BE BUILT, PERIOD! This is for Bosworth. NO NEW ROADS SHOULD BE BUILT PERIOD! This is for Veneman. NO NEW ROADS SHOULD BE BUILT PERIOD! This is for Norton. NO NEW ROADS SHOULD BE BUILT PERIOD! This is for Bush and Cheney. NO NEW ROADS SHOULD BE BUILT PERIOD! NOW, IS THAT CLEAR? I hope my words do not “seem rushed,” nor appear ambiguous in any way. I want to be very clear on this. MR. BOSWORTH: I DO NOT WANT TO SEE ANY MORE ROADS BUILT ON FEDERAL ROADLESS LANDS, PERIOD! NO NEW ROADS, PERIOD, FOR ANY REASON, INCLUDING FIRES, LOGGING, AND MINING. NO NEW ROADS, PERIOD. NO NEW ROADS, PERIOD. Is this getting through? Do you understand this time? (Individual, Libby, MT - #A8346.10150)

I am begging you to protect all our national forest roadless areas from commercial logging, road building and mining. I respectfully request that no exceptions or exclusions be created to undermine or weaken the Roadless Area Conservation Rule. (Individual, Hereford, AZ - #A8776.10150)

### **1458. Public Concern: The Forest Service should consider that human activities cause more damage in roadless areas than natural processes.**

Over the last five years, Congress has spent over \$57 million on scientific assessments for the Sierra Nevada Ecosystem Project (SNEP) and the Interior Columbia Basin Ecosystem Management Project (ICBEMP). Both of these studies concluded that commercial logging was the primary reason for increased wildfire intensity and severity. Moreover, these studies revealed that no matter what logging system was used (e.g. thinning, salvaging, or clearcutting), watersheds that were roaded and logged experienced more rapid rates of fire spread, higher fire intensities, and greater fire severity than unlogged, roadless watersheds. Conversely, the SNEP and ICBEMP studies also revealed that roadless watersheds have the highest levels of ecological integrity and the greatest resiliency to wildland fires—precisely because they have experienced less road-building, less logging, and less-efficient firefighting. Claims that roadless areas are more prone to so-called “catastrophic wildfires” because they are unroaded/unlogged are simply ignoring the Forest Service’s own scientific research, and in our opinion, these unfounded claims are merely propaganda intended to serve the short-term economic interests of resource extraction industries, not the nation’s long-term interests in ecological integrity and sustainable economies.

The superb articles published in the Forest Service’s own *Fire Management Today* (Spring 2001, Volume 61, Number 2) documents that the best available science supports strong protection for roadless areas. For example, the article by DellaSala and Frost (2001) summarizes the findings of the scientific literature:

- 1) Timber management activities often increase fuel loads and reduce a forest’s resilience to fire.
- 2) Areas without roads have been less influenced by fire suppression than intensively managed lands.
- 3) Widespread road access associated with intensively managed lands raises the risk of human-caused ignitions.

These comments were made available to the USFS during the original RACR public comment process, so this should not be new information to the CAT. The evidence is fairly clear: roading, logging, grazing, mining, and firefighting are the sources of, not the solutions to, most “forest health” problems in America’s wildlands. (Organization, Eugene, OR - #A30352.30100)

#### **ROADED ACCESS CAUSES MORE DAMAGE**

Roads cause far more wildfire danger and ecological damage than they eliminate. It’s campers who can easily get to wilderness areas by car or motorcycle that start fires, as happened in Washington State just this week. A mature forest that periodically has small, fuel-clearing fires is more healthy, and less likely to experience a wildfire, than a clear-cut “managed” forests. (Individual, No Address - #A470.30000)

Additional costs incurred by the American taxpayer include massive environmental damage to the public’s natural resources from eroding forest roads. Forest roads, while providing some limited public access, also provide a conduit for many damaging, illegal, and dangerous activities while greatly increasing the threat of catastrophic fire. It is no coincidence that the majority of human caused forest fires start within 100 yards of forest roads started by ignition from vehicle exhaust systems, burning materials thrown from vehicles, sparks from machinery, abandoned campfires and arson. The most recent fatal forest fire claimed four firefighters’ lives in early July of this year in the Okanogan National Forest in northern Washington State. The fire was started by an abandoned campfire left near a forest road. Forest roads also provide a conduit for invasion of exotic weeds, spread of insect pests, illegal dumping, illegal trespass and rampant poaching all of which are reaching epidemic proportions in various units of our national forest system. (Organization, Richland, WA - #A962.30000)

Forest roads provide a conduit for invasion of exotic weeds, spread of insect pests, illegal dumping, illegal trespass, arson and rampant poaching all of which are reaching epidemic proportions in various units of our national forest system. Failing to preserve our remaining roadless areas from road construction and other industrial activities could be one of the greatest threats to forest health of the 21<sup>st</sup> century. (Organization, Richland, WA - #A962.30100)

One of my favorite places on earth lies just within the George Washington National Forest. For two years I have hiked, fished, swam, encountered bear and thoroughly enjoyed nature here and I have already seen the negative effects of roads through the forest. With roads/paths made by men and their trucks, the lake has been over fished, water runs down the roads, eroding the mountain. The paths of streams now lie dry. I have also noticed a great amount more human activity due to these roads. This seems to be the most destructive force. Those that only come to these areas because they can drive there do not appreciate the area at all. It is a place to party for many, and often I will come upon my favorite area trashed, beer bottles and bags and just various litter strewn all over the ground. When our natural forests provide a greater challenge for us, it yields greater rewards. It forces the individual to make choices and conscious decisions to help keep these places available to all. (Individual, Harrisonburg, VA - #A4469.30100)

My 13 years working as a smokejumper gave me experience fighting fires in MT, ID, WA, OR, NM, CA, AZ, UT, WY. Some of the most destructive fires were on cut-over land and private owned forests with houses within the forest. Roadless areas are less likely to have fire ignition through careless human activities or arson. (Individual, Bozeman, MT - #A92.30100)

The Forest Service has indicated that logging is needed in the National Forests to protect them from catastrophic fires. Commercial logging does not prevent fires. Logging makes forests more susceptible to fire and disease. The Sierra Nevada ecosystem Project issued a report in 1996 that found, 'timber harvest, through its effects on forest structure, local microclimate, and fuel accumulation, has increased fire severity more than any other human activity.' Forests become drier, have less shade, and accumulate flammable debris in the form of slash piles. (Individual, Puyallup, WA - #A829.30100)

#### **TIMBER REMOVAL CAUSES MORE DAMAGE**

Logging, roadbuilding, and other management activities have been the primary degradation factor to forest ecosystems. Commercial logging intended for fuel reduction would likely increase the hazard of severe wildfires and the buildup of hazardous fuels. Recently, Huff et al. (1995) stated:

Intensive forest management annually produces high fuel loadings associated with logging residues. As a by-product of clearcutting, thinning, and other tree removal activities, activity fuels create both short- and long-term fire hazards to ecosystems. The potential rate of spread and intensity of fires associated with recently cut logging residues is high (see for example, Anderson 1982, Maxwell and Ward 1976), especially the first year or two as the material decays. High fire behavior hazards associated with the residues can extend, however, for many years depending on the tree species (Olson and Fahnestock 1955). Even though these hazards diminish, their influence on fire behavior can linger for up to 30 years in the dry forest ecosystems of eastern Washington and Oregon. Disposal of logging residue using prescribed fires, the most common approach, also has an associated high risk of an escaped wildfire (Deeming 1990). The link between slash fires and escaped wildfires has a history of large conflagrations for Washington and Oregon (Agee 1989, Deeming 1990).

Regeneration and several development patterns can have a profound effect on potential fire behavior within landscapes by enhancing or diminishing its spread (Agee and Huff 1987, Saveland 1987). Spatially continuous fuels associated with thick regeneration in plantations can create high surface-fire potential during early successional stages. This was evident in most of the roughly 275 hectares of 1-to 25-year-old plantations burned in the 3500-hectare 1991 Warner Creek Fire in the Willamette National Forest (USDA 1993). The fire moved swiftly through the openings created by past harvests, killing nearly all the regeneration but usually missing adjacent stands >80 years old.

Logged areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes.

In general, rate of spread and flame length were positively correlated with the proportion of area logged in the sample watersheds.

Increased rate of spread means that the perimeter of the fire will grow much faster. Generally, a faster perimeter growth makes a wildfire harder to contain. (Organization, Missoula, MT - #A613.30100)

The primary cause of increasing fire intensity and severity is a century of aggressive firefighting, commercial logging, livestock grazing, and road building. Analysis of the 2000 fire season revealed that the majority of burned acres were located in logged and roaded forests, not in roadless or wilderness areas. In its report on last year's fires, the Congressional Research Service concluded,

"Timber harvesting removes the relatively large diameter wood that can be converted into wood products, but leaves behind the small material, especially twigs and needles. The concentration of these 'fine fuels' on the forest floor INCREASES the rate of spread of wildfires."

In 1996 U.S. government scientists issued the Sierra Nevada Ecosystem Project (SNEP) report. The SNEP report found, "Timber harvest, through its effects on forest structure, local microclimate and fuel accumulation, has increased fire severity more than any other recent human activity." The scientists also determined that, "Fire severity has generally increased and fire frequency has generally decreased over the last 200 years. The primary causative factors behind fire regime changes are effective fire prevention and suppression strategies, selection and regeneration cutting, domestic livestock grazing, and the introduction of exotic plants." (Organization, Nevada City, CA - #A4941.30520)

The facts show that forests in roadless areas are much healthier and much less in need of management than forests in roaded and logged areas. The fire danger is also much less in roadless area. Roads and logging actually increase and size and severity of wildfires. Indeed, the team assigned to create a new management plan for Forest Service and BLM lands in the Interior Columbia Basin Ecosystem recently noted: Fires in unroaded areas are not as severe as unroaded 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. *Evaluation of Environmental Impact Statement alternatives by the science Integration Team, Interior Columbia Basin Ecosystem Management Project, page I-281*

Therefore, the best way to protect roadless areas is to prohibit road building and logging as provided by the Roadless rule. Furthermore, even where road building or logging may be required, the Roadless Rule already allows such activities where necessary to protect the forest, or protect public health and safety from any threats from fire or other "catastrophic events." There is no need to make changes to the Roadless rule in order to protect these interests. (Organization, Boise, ID - #A8240.30100)

## Management Exceptions

### **1459. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule provides resource management exceptions.**

#### **TO RESTORE ECOLOGICAL PROCESSES**

The Roadless Area Conservation Rule already provides exceptions that allow roadbuilding and logging when needed to address concerns of wildfires and forest health. Roads can be built to protect public health and safety from imminent wildfire threats and other emergencies. The rule also gives local forest managers discretion, on a site-specific basis, to thin small-diameter trees where needed to restore ecological processes, provide habitat for endangered species, and avert catastrophic wildfire. (Individual, Albuquerque, NM - #A817.30100)

The Roadless Rule already provides exceptions that allow roadbuilding and logging when needed to address concerns of wildfires threats and other emergencies. The rule also gives local forest managers discretion, on a site-specific basis, to thin small diameter trees where needed to restore ecological processes and reduce unnatural fuel loads, provide habitat for endangered specie, and avert catastrophic wildfire. The best way to maintain healthy roadless areas is to keep them roadless. Wildfires are much more likely to start in areas with roads. In fact, one of our two most recent devastating fires, were in

Washington, was caused by a spark from an automobile, driving along the road, in a logging induced, fuel-heavy forest. (Individual, Seattle, WA - #A4884.30100)

#### **TO PRESERVE ACCESS RIGHTS**

The Roadless Rule permits construction of roads in case of imminent threats of catastrophic events. It allows the cutting and removal of trees to reduce the risk of wildfire. So far 98% of fires in roadless areas have been controlled. Agriculture Department statistics show that most wildfires are ignited by human activities and start in roaded and logged areas.

The Roadless Rule does not affect these access rights. It allows road construction and reconstruction by Forest Service decision “pursuant to reserved or outstanding rights. . . .” The Roadless Rule does not prevent road maintenance or trail construction in roadless areas. (Individual, Porterville, CA - #A3631.30200)

#### **TO CONTROL FIRES AND INSECTS**

Right now fire fighters are using bulldozers to control a fire in the Mt. Zirkel Wilderness Area in Northern Colorado. They are using bulldozers in a Wilderness area. Was there any public comment on whether to do this? No. It was just done. The argument that this Roadless Area Conservation rulemaking will impede the control of fires and insects is ludicrous. Right now fire fighters are using motorized vehicles in the Mt. Zirkel Wilderness Area. This rulemaking will not prevent the Forest Service from protecting our forests. In fact, it will do the forest good in some cases to be burned or be ravaged by insects and disease. (Individual, No Address - #A4990.30100)

### **1460. Public Concern: The Forest Service should consider that the road building and timber removal exceptions to the Rule are too narrow to provide the needed flexibility.**

#### **INCLUDE A POLICY STATEMENT THAT ALLOWS LOCAL FOREST SUPERVISORS TO TAILOR FOREST PLANS AND RESPOND TO LOCAL CIRCUMSTANCES**

The blanket prohibitions make it difficult for the Forest Service to respond to wildfires, pest infestations, and other catastrophic or unforeseen situations in the national forests. Temporary roads and/or timber management might be necessary in order to prevent destruction of segments of the national forests.

The so-called “exceptions” to the road building and timber harvest prohibitions are too narrow to provide the needed flexibility. Moreover, they will only serve as a point of focus that opponents will use to litigate any road. As a result, the current rule will foster increased litigation. A policy statement that allows local forest supervisors to tailor forest plans and to respond to local circumstances provides the necessary flexibility. (Individual, Eagle, ID - #A17754.30100)

### **1461. Public Concern: The Forest Service should define specific national criteria for management exceptions requiring roads in designated roadless areas.**

Carefully define specific national criteria for consideration of any exception in the designated areas for how fire, wildlife, fish, forest health and any other legitimate management needs requiring roads can occur. (Individual, Lyons, NY - #A1737.30200)

### **1462. Public Concern: The Forest Service should constrain exceptions to Roadless Area Conservation Rule regulations by specific conditions and restrictions.**

#### **INCLUDING TIME LIMITS, SPATIAL LIMITS, DETAILED DESCRIPTIONS, AND MONITORING AND REPORTING**

##### Conditions and Restrictions Should be Required for Each Exception Granted.

Each time an exception is granted, it should be constrained by specific conditions and restrictions. At a minimum, these should include:

1. Time Limits. The activity should be authorized for a period of time that is commensurate with the justification on which is based, with mandatory reviews of conditions giving rise to the exception at appropriate intervals.
2. Spatial Limits. The extent of authorizing activity should be the minimum found to be necessary to address the underlying justification, while enhancing roadless area values.
3. Detailed Description. The exception should be carefully defined in terms of: (1) actions that are authorized; (2) prohibitions on deleterious design/construction/implementation features; (4) restoration requirements (e.g., for roads, funding and requirements for proper removal of temporary roads); and (5) secure funding monitoring effects and for restoration.
4. Monitoring and Reporting. Appropriate monitoring and reporting (including funding) on authorized activities should be required in every case to ensure compliance with conditions and restrictions. (Organization, Washington, DC - #A23283.30200)

## Roads/Access – Forest Health Management

### Summary

**General Comments** – Access is a topic of comment to a number of respondents, particularly as it relates to forest health management. One general response is that the Forest Service should address the impacts of new roads in roadless areas on forest fires.

**Funding** – One tribal representative states that budget constraints and prohibitions on road development and maintenance will render many projects unfeasible and impose unacceptable risk on many roadless areas.

**Roads/Access** – Respondents urge the Forest Service to allow motorized vehicles and road construction/road access for forest health management—to ensure firefighter and public safety; to carry out forest health treatments; to reduce fire hazards; and to respond to natural hazards (e.g., earthquakes). In addition, an organization asks the Forest Service to comply with Revised Statute 2477 to maintain motorized access for forest health management. According to this group, “Almost all so-called ‘roadless’ areas actually contain an extensive network of RS-2477 roads and rights-of-way. If USFS obeys statute law—especially the RS-2477 savings provisions of FLPMA and the Section 108 prohibitions on redefinition of RS-2477s . . . and refrains from interfacing with county and individual RS-2477 maintenance and repair, the motorized access that is essential for forest health will usually be available.”

Others assert that forest health should not be used as an excuse to build roads in roadless areas. These respondents state that road construction/road access should be prohibited because roads enable the introduction of exotic or invasive plants and animals; because adequate roads already exist for fire suppression purposes; and because roads won’t stop fires. People suggest that in the event a road or temporary access is necessary for forest health management purposes, it should be restored as soon as possible after the event. Additionally, many assert that vehicles should be prohibited to prevent arson and wildfires and the spread of pathogens.

### *Roads/Access General*

#### **1463. Public Concern: The Forest Service should address the impacts of new roads in roadless areas on forest fires.**

It needs to be pointed out that the present subject relates to new roads in roadless areas. The question should be limited to roads and not fires in general. It should be how do new roads in roadless areas impact forest fires, for better or worse? (Individual, Chico, CA - #A17483.11140)

### *Funding*

#### **1464. Public Concern: The Forest Service should consider that budget constraints and prohibitions on road development and maintenance will render many projects unfeasible and impose unacceptable risk on many roadless areas.**

There are 66 million acres of national forest lands known to be at risk from catastrophic fires and another 58 million acres at risk from insects and disease. Many of these high-risk areas are located in inventoried roadless and unidentified “unroaded” areas and contain valuable spawning streams, critical wildlife habitat, timber, and other resources. Some of the high-risk areas are overly dense stands of trees

that need to be thinned, while others contain excessive accumulations of fuel, especially from dead and dying trees that need to be removed to reduce wildfire potential. Given budget constraints for stewardship purposes that the Forest Service faces annually, precluding further road development or in some cases maintenance of existing roads will render many projects unfeasible and impose unacceptable risk on many roadless areas. Passive management will not solve these problems.

For example, the CNF is presently suffering from a pandemic of spruce bark beetles which has devastated more than 95,000 acres of national forest 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 and for an open assessment of all appropriate management techniques. (Tribal Corporation, Anchorage, AK - #A20340.30100)

## *Allow Roads/Access*

### **1465. Public Concern: The Forest Service should allow road construction/access.**

#### **FOR FOREST HEALTH MANAGEMENT**

Local resource managers should be given flexibility to identify and implement alternatives which provide for construction of roads in order to access areas susceptible to or actively involved in insect infestation and disease resulting in tree mortality, including those areas designated as Wilderness. Construction of roads necessary for fuels reduction, timber stand improvement, watershed protection and preservation of habitat must be emphasized. Communities and private properties near and adjacent to federal lands should be protected from risks associated with wildfires through a combination of better forest management practices including but not limited to the following:

- \* Thinning tree density to a level which can be sustained in the local climate and soil conditions in a healthy condition;
- \* Mechanically reducing fuel levels, especially ladder fuels, to a level where controlled burning can be safely reintroduced and, when this has been accomplished, allowing natural fires to reassume their role in keeping fuel levels at a non-dangerous level;
- \* Utilizing the expertise of the forest pest management personnel to reduce insect infestation; and
- \* Utilizing environmentally sound logging practices to selectively harvest timber to keep tree density at healthy and sustainable levels and ensure an appropriate percentage of old growth. (Elected Official, Markleeville, CA - #A8597.30200)

Prescribed burning is an important management tool, but it has recently been experienced. This proposal that roads can be built into roadless areas when human safety and property are at risk, we applaud. However this is a backwards approach. Restoring ecosystem health will enable the forest to be more resistance to catastrophic stand replacing insect epidemics and fires that are already being experienced. A preventive approach is more appropriate. An obvious flaw in the proposal is the lack of an option to build roads to provide reasonable access to eliminate insect “hot spots” by controlling emerging beetle epidemics before they spread. A question that begs to be asked is, isn’t the health of the forest ecosystem important enough to justify appropriate management which might include reasonable access provided by road construction and reconstruction? We suggest that acceptable conservation and management cannot be accomplished by the preservationist spirit of this presidential political motives proposal. The present social and environmental philosophy of preservation is very different from real preservation and ecosystem sustainability that can only be accomplished by proper conservation and management. Ecosystems need to be managed by good science not political agendas. (Professional Society, No Address - #A27584.30200)

**FOR RESOURCE MANAGEMENT**

How do you manage a forest without roads? To keep a forest healthy there must be access. Blowdown must be harvested for two reasons. 1. To prevent bug infestation and 2. To reduce the buildup of fuel. Fuel buildup must be kept at a minimum. Bug infestation must be detected and controlled. To manage the fuel buildup you have two options, but you must have access. To detect bug infestation you could use helicopters and satellite photos. Both of these options will mean loss of large amounts of timber before detection is accomplished. On the ground detection is much more viable. But you have to have access. Control can be accomplished by aerial spraying usually. (Individual, Miami, AZ - #A880.30200)

The existing roads have been built at considerable costs and should not be wasted.

The roads are needed for Fire Suppression.

The roads are needed for Rescue, public safety, and security.

The roads are needed for continued reasonable logging, some for timber value when stands are mature, some logging for the health of the forest, some to reduce major fire hazards. (Individual, Missoula, MT - #A4891.30200)

The forest planning process must give recognition to the importance of roads for fire suppression, access for emergency/rescue personnel, public safety, maintenance and service, and insect and disease treatment. Given the dynamic nature of forest conditions, flexibility in management activities is necessary and can only be achieved through exceptions to roadless management prescriptions. (Permit Holder, No Address - #A5285.30200)

Clearly, access to roadless areas is needed to promote the health of the forest and to allow for the harvest of insect- and disease-damaged timber and of wind-damaged timber stands. (Elected Official, Ketchikan, AK - #A17476.30100)

In ending I'll say we must be able to maximize fire fighting efforts in our forests. That translates into 'roads'. Four young firefighters died recently fighting the 30 mile fire here in Washington state. I read in the newspaper that helicopters were delayed going into the area because they needed first to obtain permission from a fisheries bureaucrat to fill their water bags from a particular stream with which to fight the fire. If this is true than virtual murder was committed to supposedly 'protect fish'. First we sacrifice citizen's rights for nature. Now we must sacrifice human life? This mentality in government is intolerable. (Individual, Lake Stevens, WA - #A8688.30200)

**FOR FIRE HAZARD REDUCTION**

Common sense should be utilized in any management decision. Allow enough roads in every area to quickly and easily fight any fires that occur, with minimal risk to fire fighters. Realize that managed logging to remove fuels, as well as remove dead or dying trees is necessary, and understand that birds and animals adapt and trees grow back, so reasonable logging to provide income for local schools, etc. can and should be done. (Individual, No Address - #A752.30000)

Closing our National Forests by this action causes our forests to be in much greater jeopardy from fire than were they more accessible by roads. It also puts the firefighters in more danger than they would be in were there ways to evacuate them in emergencies and to get equipment and supplies to them as they fight fires. (Individual, Amarillo, TX - #A533.30400)

Our forests are in extreme danger of fires, not to mention the mismanagement of our lands. Fixing this problem will take some time I agree, but how are we going to fight these fires when we have to wait for a key to a gate! We need to open up the roads that have been gated off over the years! Everybody I know cares dearly about our forests. Please open up the roads so we can care for them, our forests are in mostly needed of the sovereign states taking care of their own lands. I repeat – I oppose the Clinton roadless issue. (Individual, Kalispell, MT - #A1135.30200)

Roads are an integral part of protecting communities, homes, and property. All forms of mechanized equipment, vehicles, aerial support, chainsaws, and pumps are required in order to protect communities, homes and property. Some roads should be accessible only to administrators for protecting communities. Basically this means for fire protection and control of insects and diseases. (Individual, Aloha, OR - #A3675.30200)

Since the Gifford Pinchot era it has been recognized that access is key to economical management of the various forest treatments and activities, yet the Forest Service proposes to eliminate reasonable access forever to a major segment of the National Forest system while implying that forest treatments can still be accomplished.

The Forest Service is currently engaged in multiple wildfires in the west, and in almost every instance your own Fire Information Officers' are constantly being quoted as saying that the fire is difficult or impossible to control/contain because of lack of access with resultant inability to rapidly deploy resources coupled with the insufficient availability of airborne (the most expensive) resources, ad infinitum. (Individual, Seeley Lake, MT - #A8075.30200)

Local comprehensive planning should support strategic access for fire fighting; regional plans should recognize roads that serve no mutually held values, and these should be closed. (Individual, Elko, NV - #A23651.30400)

#### **FOR THE USE OF HELICOPTERS FOR FIRE MANAGEMENT**

Helicopters play important roles in wildland management and fire response. When conducting operations in remote locations, helicopters require ground support personnel, equipment and vehicles, none of which can move safely and effectively without some form of primitive road access.

These firefighters need primitive roads to permit them to access helicopter staging areas with needed equipment in an efficient manner. More importantly, these firefighters need primitive roads as escape routes if air evacuation becomes impossible. (Business, Alexandria, VA - #A30200.30600)

#### **FOR FIREFIGHTER AND PUBLIC SAFETY**

(Only a very small percentage of the population can enjoy a forest without roads.) Most importantly, the lives of our firefighters are at stake—their risks are high enough as it is! (Individual, Loveland, CO - #A22368.30200)

Roads in the forests are needed to save the forests from destructive wild fires. Firefighters drop into remote sites and can be killed if no equipment can reach them through the roads. DO NOT lock up the forests. (Individual, No Address - #A27509.30200)

The forests should have roads just to get at fires. Also to rescue campers or lost people. Please use common sense and not politics. The tree huggers are not realistic and are out of step with the real world. (Individual, Alexandria, VA - #A4984.30200)

#### **FOR PEST MANAGEMENT**

Management of problems and pests can best be managed with access. (Individual, Jarbidge, NV - #A8842.30200)

#### **TO ALLOW RESPONSE TO ADDITIONAL HAZARDS SUCH AS LANDSLIDES, EARTHQUAKES, ETC.**

There are additional hazards-related discussions and updates needed in the document. Many of the mapped landslides in Wyoming have dammed or nearly dammed streams or rivers. There is a real potential for streams or rivers to be dammed in the future, creating a significant risk to public health and safety. In areas with significant seismic hazards, the risk is amplified. Road access should be provided and maintained to the high hazard areas to facilitate a timely response when needed. It is too late to consider road construction into an area after a 100-300 foot landslide dam has formed, and as a result, the downstream population is placed at risk. This is tied to Section 294.12 of the proposed rule (page A-

27), which states that a road may be constructed or reconstructed if “A road is needed to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event.” These hazards are rarely recognized before catastrophic situations arise. Again, it would be nearly impossible to build a road into a newly formed landslide dam in a timely manner to mitigate a landslide after the fact, due to the subsequent NEPA analysis and associated time frame that is mandated for such analysis. This proposed rule puts the public at increased risk. (Elected Official, Cheyenne, WY - #A22609.30200)

#### **TO ALLOW COST-EFFECTIVE FOREST HEALTH TREATMENTS THAT CAN PROVIDE LONG-TERM PROTECTION OF WATERSHED QUALITY**

Any rule should recognize that “protection” of roadless areas does not equate to protection of natural environments. Rather, what is being protected is an environment that has been altered through fire suppression and, in some instances, past lumbering that favored larger diameter trees. In many instances, reduction of fire frequency has resulted in a move toward denser and smaller diameter stands, with a greater component of later-successional species which are less resistant to fire.

Build up of ground and ladder fuels has created an environment prone to catastrophic wildfires. Catastrophic wildfires create concerns for watershed integrity. Intense heat may result in increased hydrophobic soils, so that peak flood flows increase and summer base flows decrease, resulting in streambank erosion, channel widening, and sedimentation. Instream and riparian habitat can be altered to the detriment of aquatic and riparian species. Thus, in many cases, long-term protection of watershed quality can be enhanced through construction of roads that allow cost-effective forest health treatments. (Governor, State of Idaho - #A20141.30400)

#### **TO REMOVE DEAD TIMBER**

There should be roads built every 3 or 4 miles where feasible, so dead timber can be harvested. I have traveled many miles in the West and have seen many acres of dead timber and was told it could not be cut! Other roads I have been on have large trees dead too amongst mostly live timber that could be cut and sold as to leave dead stuff for fire problems and help the timber shortage for lumber. (Individual, Turtle Lake, WI - #A6075.30520)

#### **WITH THE RESTRICTION THAT ROADS BE OPEN ONLY FOR FIRE PROTECTION AND EMERGENCIES**

Limited and VERY CLOSELY WATCHED harvesting of some of the forests can enhance their life of productivity and longevity. Some roads will have to be made including some in wilderness areas to remove burned, beetle infected, and build up of hazardous fuels. Some of these roads may be left open for future emergencies. The only time they can be used is for fire protection or other authorized emergencies by the Forest Service. These roads will be closed at the entrance by locked gates. Unauthorized trespass will be met with a fine, a term in jail and a ban from all national forests for no less than 5 years. If the penalty is great enough the next time they will think twice before they proceed. (Individual, Rock Springs, WY - #A5695.30200)

In short, new roads should be built only out of necessity such as for Fire control or medical Emergencies.

New roads for safety only seems to make sense. Lets try to make these minimal. (Individual, Salem, MA - #A8694.30200)

#### **BECAUSE OTHERWISE STATE AGENCIES MAY NOT ALLOW THEIR FIREFIGHTERS TO ASSIST WITH FIREFIGHTING EFFORTS ON FEDERAL LANDS**

Roads offer access to manage the public lands with prescribed burning, timber harvesting and 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 harms way with no retreat route (no roads). (Individual, West Point, UT - #A5415.30200)

**1466. Public Concern: The Forest Service should allow road construction/access.****LOW IMPACT ROADS**

Secondary access should be lower class roads built at much less cost but adequate for erosion control. These should be left open for fire emergency access, with access to the public controlled by locked gates. (Individual, Payette, ID - #A1049.40000)

As the owner of a small scrawler tractor, I know that access can be accomplished if very carefully done by smaller scale machinery and smaller scale vehicles with "roads" that are carefully built in small scale and with major view towards aesthetics, non-devastation of any kind, activities to help clear away the forest burdens. I believe some of the most dangerously overburdened areas, even though "roadless" need to be looked at in terms of dealing with these things. (Individual, No Address - #A5360.30100)

To the extent possible these areas should be maintained as roadless areas. Recreation and biodiversity should be given the highest considerations in management of these areas. These two values are not mutually exclusive as was sometimes suggested by the previous administration and some groups. The Forest Service already has more roads than it can maintain, so road construction in roadless areas should only occur in rare circumstances. If, after local planning, construction of a temporary road or other road is essential to provide for enhancement of wildlife, for firefighting or to improve forest health, new low-impact construction techniques should be employed. (Permit Holder, Knoxville, TN - #A29069.50100)

**TEMPORARY ROADS**

The prohibition against road building and timber harvest in the new policy runs counter to creating and maintaining healthy forests. Roadless areas would be at great risk for severe wildfires and disease and pest infestations. Local managers need the flexibility to authorize temporary roads for forest health projects. MCFB strongly urges the service to abandon the unofficial policy of "protection through non-management". The unique ecological characteristics of each national forest and its inventoried roadless areas require management direction at the local level with local input and local science instead of a national uniform mandate. As mentioned before this will require updating mapping so roadless areas can be overlaid with mapping of areas with disease or pest problems, severe fuel loads, etc. (Association, Alturas, CA - #A17770.30200)

**1467. Public Concern: The Forest Service should include an alternative in the National Environmental Policy Act process that gives direction for road construction.****FOR FOREST HEALTH MANAGEMENT**

One alternative in the NEPA process should be the direction that roads would be built for management of the resources including protection of forests from severe wildfires, the buildup of hazardous fuels, and to provide for the detection and prevention of insect and disease outbreaks. (Individual, McMinnville, OR - #A5106.30100)

**1468. Public Concern: The Forest Service should allow the use of motorized vehicles.****FOR FOREST HEALTH MANAGEMENT**

I have several concerns with the plan. First, its implementation would negatively affect the health of acres of national forest lands. The United States General Accounting Office has identified nearly 40 million acres of National Forest lands, some of which are already designated as roadless forest lands, that are at serious risk of catastrophic fire loss and bug infestation. By banning motorized vehicles on national forests, the proposal would limit the ability to fight forest fires and effectively manage our nation's forest lands. In particular, the inability to treat the pine beetle epidemic in the Black Hills National Forest could have dire consequences for my state. (United States Representative, South Dakota, - #A18062.30100)

To provide for healthy forest, leave the roadless areas alone. If there is a need to enter these areas for treatment of localized problems, that can be done by helicopter, draft horse, snowmobile, etc. They are roadless but not wilderness areas, so machines can be used. (Individual, Northfield, MN - #a22395.30100)

**FOR FOREST HEALTH MANAGEMENT ONLY, WITH ACCESS PROHIBITED UNLESS AUTHORIZED BY A FOREST PLAN**

Access for fire, disease control and salvage should be expressly allowed. All other road access should be prohibited unless otherwise authorized by a forest plan. (Business, Seattle, WA - #A20468.30200)

**ALLOW HEAVY EQUIPMENT FOR FIRE CONTAINMENT AND OTHER MANAGEMENT NEEDS**

The only tools available to the Forest Service appear to be those used for Wilderness areas. Continue to allow access on existing roads and trails. Heavy equipment use to contain forest fires and other management needs should not be prohibited in so-called roadless areas. Access and road construction should be allowed for other forest management activities. Timber harvest, removal of dead or disease trees should be exempt from the Rule. There is no such thing as a “severe” wildfire, there are just wildfires. There should not be any restrictions with respect to fire control and suppression severe or not. (Elected Official, Lander County, NV - #A27730.30000)

**TO FACILITATE FIREFIGHTING IN WILDERNESS AREAS**

Maybe more practical to provide access roads which would also facilitate firefighting in Wilderness areas. (Individual, Fernandina Beach, FL - #A16024.30200)

**1469. Public Concern: The Forest Service should comply with Revised Statute 2477.**

**TO MAINTAIN MOTORIZED ACCESS FOR FOREST HEALTH MANAGEMENT**

Almost all so-called “roadless” areas actually contain an extensive network of RS-2477 roads and right-of-ways. If USFS obeys statute law—especially the RS-2477 savings provisions of FLPMA and the Section 108 prohibitions on redefinition of RS-2477s . . . and refrains from interfacing with country and individual RS-2477 maintenance and repair, the motorized access that is essential for forest health will usually be available. (Organization, Tonopah, NV - #A20337.20208)

**1470. Public Concern: The Forest Service should modify the criteria for roadless designation to allow the construction of new roads for fire and disease management.**

**BECAUSE THEY ARE LESS DAMAGING THAN ROADS CONSTRUCTED DURING FIREFIGHTING**

The wide sweep of human impacts on Forest Service lands makes the traditional criteria for roadless designation less than realistic. We think a substantial case can be made that some degree of access must be provided to all lands, particularly in the West, where there is continuing need for fire and/or insect infestation response and prevention activities. This is particularly true where Forest Service lands pose a threat to private lands or public active-use areas. In some cases this access can be obscured to maintain an unroaded appearance. To us, it seems a better solution to have an engineered alignment available to enter areas rather than having to resort to the heavy-handed approach that is often necessary during an emergency response even though pre-emergency work may violate the contemporary “roadless” definition. (Association, Sacramento, CA - #A15787.25000)

**1471. Public Concern: The Forest Service should maintain trails.**

**FOR FOREST HEALTH**

Provisions should be stipulated in the final rule to allow exceptions in the management constraints in order to avoid the build up of hazardous fuels, allow for the suppression of catastrophic fires and to provide for the detection and prevention of serious insect and disease outbreaks. Existing trails should be

maintained to an acceptable standard and where desirable new trails maybe be constructed in order to facilitate management activities and to provide public access. (Individual, Eagle, ID - #A3368.30100)

## *Do not Allow Roads/Access*

### **1472. Public Concern: The Forest Service should not use forest health as an excuse to build roads in roadless areas.**

#### **BECAUSE IT IS COST PROHIBITIVE**

Money should not be available to build roads to manage forests from wildfires, buildup of fuels and to provide prevention of insect and disease outbreaks for it would be cost prohibitive plus I see this as an end round to allow logging at an economic loss. (Individual, Sequim, WA - #A16967.17100)

#### **BECAUSE FIRES WILL BURN AREAS REGARDLESS OF THEIR ROADED/ROADLESS DESIGNATION**

We know there is great concern among some that roadless areas are high fire hazard areas and that unless they are roaded and logged the accumulation of fuels will lead to catastrophic wildfires which will incinerate already roaded regions. It is true that roadless areas have high fuel loads. But the same is true of already roaded areas, which burn just as fiercely as roadless areas. The Tyee Fire on the Entiat River of the Wenatchee N.F. in 1993 burned just as hot in roaded areas as it did in unroaded ones. After the fire, some of the roaded areas were salvage logged. Result: roaded areas had less of a legacy of large logs and course woody debris with which to start next stands of trees. That meant less soil moisture, less habitat for fungi colonization and less cover for predators of gophers, all of which added up to less healthy trees and a degraded forest. Under some circumstances, fire in roadless areas will spread into managed forests, just as fire in roaded areas sometimes invades roadless areas. But that is no argument for roading roadless areas, unless one thinks the Forest Service can always control fires in roaded areas. The fire seasons of 1960, 1970, 1988 and 2000 showed that neither the Forest Service nor anyone else can stop fires in roaded areas in severe fire weather. Putting roads into roadless areas will do nothing to prevent conflagration fires. (Individual, Portland, OR - #A6269.30200)

Though there is some truth to the idea that fire suppression has, in some areas, created excess of combustible material (“hazardous fuels buildup”) it has been greatly exaggerated, and is certain to be used as an excuse for logging, and escape environmental regulations, if local planners are given new opportunities to override the Roadless Area Conservation Rule. It is easy to demonstrate that extreme drought has much more to do with catastrophic wildfires than excess fuel, and it is very likely that global warming plays a much greater role in the growing number of forest fires. Even tropical rain forests have been the victims of conflagrations in recent years. (Individual, Hatboro, PA - #A17830.30100)

#### **IN THE TONGASS NATIONAL FOREST**

Under the Forest Service’s current plans for roadless areas of the Tongass, the level of road building is completely unjustifiable. The Tongass is scheduled to provide half of all Forest Service timber that is cut from roadless areas in the next five years. More than 80 percent of all new roads in roadless areas in the entire Forest Service system will be built in the Tongass.

That level of road building is not justified by the “forest health reasons” mentioned by Chief Bosworth on several occasions when he discussed reasons for building roads into roadless areas. The two most commonly used “forest health” excuses for continuing to log roadless forests in the Lower 48 do not apply in the Tongass. The Tongass is still dominated by old-growth stands, so it does not require thinning or treatment to mimic original forest condition and improve wildlife habitat. And because it is a rainforest, with an average of roughly 100 inches of rain a year, fuel loading and fire suppression are not an issue. (Organization, Sitka, AK - #A30486.45623)

**1473. Public Concern: The Forest Service should prohibit road construction.****BECAUSE ROADS CAN SPREAD DISEASE AND NOXIOUS WEEDS**

Here in California we have a fungus that is quickly adapting to attack and kill more and more species of trees. It is a close relative to the Port Orford cedar disease that has nearly eliminated the species in the western US, and which has been spread on the tires of logging equipment. The more roads, the more areas threatened by diseases known and unknown. (Individual, Sebastopol, CA - #A122.31200)

Building more roads will INCREASE the spread of disease and reduce forest health. Vehicles, including logging trucks and equipment, can spread disease. Two examples are the Port Orford Cedar root disease and Sudden Oak death in California. The Forest Service's own literature backs this up. (Individual, McKinleyville, CA - #A1269.31200)

Exotic weeds are already a major problem in roaded areas of our National Forests. If we continue to build roads in the National Forests here in Western Montana, the result will be to completely destroy the unique and wonderful character of this region, and to destroy its value and appeal for people like myself. (Individual, Lakeside, MT - #A3729.31300)

I am using Geographic Information Systems to predict the likelihood of an area containing Port Orford Cedar becoming infected by *Phytophthora lateralis* (Port Orford Cedar Root Disease). My study area is located within the Smith River National Recreation Area. The Port Orford Cedar in this area is heavily infected by *P. lateralis*.

Vehicles traveling along roads are known to be the main source of new infections. The disease does not occur where roads do not exist. The same scenario applies to many other exotic pathogens and plant species (Yellow Star Thistle). (Individual, Arcata, CA - #A1098.31221)

Disease and insect damage is even less an issue in roadless areas. Many of the major timber infestations occur in the monoculture tree farms which replace the forests that were clearcut earlier. When specific diseases do manage to invade the wilderness and roadless areas, it's often because they are brought in on the wheels of off-road vehicles. The Roadless Area Conservation Policy adequately evaluated the issue and found, "The percent of area at risk in inventoried roadless areas is about the same as the percent of area at risk for all NFS lands." (Roadless Policy FEIS, Vol. 1, p. 3-119) Further, "Invasion of nonnative species, is one of the most important issues in natural resources management today, with more than 6000 species originating outside the United States. Since roads provide an entry way for nonnative species, inventoried roadless areas can act as strongholds against invasion of these species." (Roadless Policy FEIS, Vol. 1, p. 3-126) (Individual, Eugene, OR - #A15583.31200)

It is the presence of roads, rather than roadlessness, that threatens the health of the forest in other ways as well. Thus, the spread of non-native, invasive plants is greatly enhanced by roads, even those that are unpaved and rarely traveled. A prime example is *Microstegium vimineum* (Japanese grass) that has recently become a real threat to native plant diversity throughout the eastern U.S. (Organization, Oak Ridge, TN - #A8073.30100)

"Invasion of non-native species into North American ecoregions is one of the most important issues in natural resource management today . . . Unfortunately, the ability of natural resource managers to eliminate invasive species, once they have become established is often very limited." (DEIS 3-47) A multitude of negative impacts to native species and ecosystems results from these invasions; invasions that are usually the result of human disturbance or facilitation. "Without any of the ground disturbance and ecological edges associated with timber harvest and combined with a 75% reduction in road construction and reconstruction, this alternative [#4] would provide the greatest assurance that these areas would retain current levels of resistance to the introduction and establishment of many non-native invasive species." (DEIS 3-91) This writer's personal experience has revealed cut-over sites and road

edges overrun with invasive species such as the Asian tree-of-heaven on the GW - JNFs (see, e.g., the Icy Hopper timber sale area adjacent to the Thunder Ridge Wilderness Area on the Glenwood Ranger District of the JNF). (Individual, Staunton, VA - #A29325.31300)

**BECAUSE ROADS AND DISTURBANCES ENABLE EXOTIC PLANTS AND ANIMALS TO ENTER PREVIOUSLY UNDISTURBED AREAS**

I am keenly aware of the impact of roads of enabling invasive species to make “inroads” into previously undistributed, uninfested areas. Much of the distribution of red imported fire ants can be traced to colony movement along roadsides and power line easements. I feel that making new roads into roadless areas is asking for more trouble than benefits. A good case in point is the health, economic and ecological costs of the fire ant in the southeastern United States alone; they are tremendous. Then consider that most ecologically damaging species, both plants and animals, are dispersed and thrive in disturbed areas such as roadsides. It is high time that we figure in the long-term costs of ecological damage in our cost/production/benefit decisions. (Individual, College Station, TX - #A26846.31220)

**Biological Invasion:** Roads enable invasive plants and animals, many of which are non-native, to expand their ranges to the detriment of native plants and dependent species. Exotic species often thrive in the environments created by roads and can also be inadvertently transported by vehicles. Roads create open edges to forest which make species more vulnerable to pest epidemics, invasion by nonnative species, and nest parasitism. Examples include; weeds, such as spotted knapweed; aggressive brood parasites, such as the brown-headed cowbird; and pathogens, such as cedar root rot. (Organization, Boise, ID - #A20853.30100)

**BECAUSE BOAT TRAILERS CAN INTRODUCE EXOTIC SPECIES TO WATERSHEDS AND LAKES**

I am writing to express my concern over the possibility that more roads would be built near the BWCA. I am a cabin owner on a remote lake which has no road to it and I like it that way.

The BWCA should have a sizeable no road buffer zone around it preserved for several reasons. Roads that cross water would allow the access of boat trailers which are the main route that exotic species such as Eurasian Milfoil are introduced. I believe canoes are not a significant source of these exotics but trailers are. (Individual, Clear Lake, IA - #A8885.45621)

Wild areas are becoming increasingly rare and once a road is cut the signs of the road remain for centuries.

One of my concerns is keeping lakes which are remote from having road access. Efforts to keep Eurasian Milfoil and other exotic species from permanently altering lakes throughout the midwest are basically failing.

Boats on trailers are the source of exotics and keeping roads from remote lakes which can only be accessed by canoe is about the only way to prevent such introductions. (Individual, Clear Lake, IA - #A8886.45622)

**BECAUSE ADEQUATE ROADS EXIST AND ARE NOT NEEDED FOR FIRE SUPPRESSION**

As a professional wild land fire fighter, I never did not make it to the fire I was dispatched to suppress, for lack of a road. In those areas where wildfire burned with no road access, we walked or were ferried in by helicopter, and on occasion, teamed up with smokejumpers that had parachuted in. Saying we need to build roads into roadless areas for the sake of preventing severe wildfires is a scare tactic used to inflame the uneducated public. (Individual, Gridley, CA - #A3712.30200)

This is another red-herring, I suspect, the implication being that we need these roads in order to get in proper fire suppression tools. We don't. (Individual, No Address - #A49.30200)

As a 15-year Montana firefighter, I can testify that the Roadless Area Conservation Plan is no hindrance at all to wildland firefighting, whose personnel, resources and techniques are well adapted to firefighting without roads.

The FS's mandate is resource protection—preservation of ecosystems and habitat—fire creates these rather than destroys them.

Please adopt the plan in its present form! (Individual, Billings, MT - #A6512.30400)

Roadless areas have prospered without roads for millennia. There is no evidence that roads are necessary to ensure their continued health. The Forest Service does almost all of its insect and disease surveys aerially; thus roads are quite unnecessary for that purpose. So-called “severe” wildfires are generally quite natural stand-replacing fire events that have been occurring in our forests for thousands of years. Forest types in most roadless areas have not been adversely affected by fire suppression during the last fifty years. These forests do not burn frequently and when they do burn usually do so in stand-replacing fires. Thus there is no ecological justification for road construction or silvicultural activities in these forest types. (Individual, No Address - #A12607.30200)

#### **BECAUSE FOREST SERVICE PERSONNEL CAN ACCESS ROADLESS AREAS BY OTHER MEANS**

The best way to manage for healthy roadless areas is to access on foot, by horseback or on appropriate occasions by mountain bike and helicopter. In areas in need of “heavier” temporary restorative approaches temporary snow roads or airstrips can be established, the work performed, and the road or airstrip restored back to its natural habitat. (I used a mountain bike very successfully in conducting ecological inventories and identifying or adjusting avoidance, mitigation and restoration measures). The existing rule already provides exceptions for roadbuilding and logging to address wildfires and forest health. According to the Forest Service, only 2% of inventoried roadless areas are at combined risk of insects, disease, and fire, and about 98% of fires in roadless areas have been ecologically managed without the need to construct roads. This is because roadless areas have been naturally self-sustaining and have not been impacted by the often heavy impact of man. (Individual, Watsonville, CA - #A6767.30100)

Detection—of whatever—certainly does not require a road. Most Forest Service employees ought to be capable of walking or riding a horse to determine the status of ecological variables in roadless areas. Fires that might threaten values outside of roadless areas can be detected as they are now—by lookouts or by aerial patrol. (Individual, West Glacier, MT - #A5946.30100)

Roads are not needed to help manage healthy forests. Hazardous fuel build up could be controlled by control burns. These burns can be applied by forest service rangers, who can hike into roadless areas or be dropped off by helicopter. (Individual, No Address - #A17702.30200)

#### **BECAUSE HELICOPTERS CAN BE USED FOR CONTROLLED BURNS AND AIR TANKERS CAN BE USED FOR FIRE SUPPRESSION**

The protection from “severe wildfires and the buildup of hazardous fuels” can also be managed without the use of roads. The field ecologists and biologists already walking the woods could identify such problems. In such cases controlled burns using helicopters, and air tankers for suppression would be a viable alternative to road-building.

If roads were to be built into areas that are in danger of severe wildfires, it makes them more accessible to careless individuals who may start fires. Electrical storms start enough fires, introducing a human element is not necessary. (Individual, Walla Walla, WA - #A17698.30200)

#### **BECAUSE ROADS WON'T STOP FIRES**

Here are 2 more Montanans who would very much like to keep our remaining “roadless” areas, roadless. Also, it's very interesting to drive through the Bitterroot Valley in western Montana and look at the land that burned so bad last year. The one thing that really shows clearly through the destroyed timber is all the logging roads! Now “they” really did a great job of stopping those fires didn't they! (Individual, Victor, MT - #A21302.10150)

### AS A GOOD WAY TO MANAGE WILDFIRES

You have asked us to respond to ten questions. Among these is the question of wildfire control. Preventing road construction is a good way to manage wildfires. When roads are not maintained, as more and more of our roads in the National Forests have become, they become built up with brush and tinder. These roads make fires fiercer and spread more quickly. They provide minimal access for firefighters. Roads also promote logging, which generally culls the largest, fire-resistant trees and leaves behind highly inflammable debris. Fire management goals will be best served by protecting our roadless areas. (Individual, Claremont, CA - #A15513.30400)

In terms of the goal for protecting roadless areas from severe fires, logging roads have a paradoxical effect: they are places where wildfires can be contained, but are also places where wildfires are often ignited. A significant portion of human-caused wildfires are, in fact, ignited alongside roads, and as a general rule increased road access results in increased risk of human-caused wildfires. Thus, while to some extent roads may help to suppress wildfires, roads can also hinder the agency's efforts to prevent wildfires. The link between arson fires and logging roads is particularly strong, an arson is the most difficult kind of human-caused wildfire to prevent. Unfortunately, forest arsonists are rarely captured or convicted, and the vast network of logging roads carved into the National Forests has greatly increased the burden on fire prevention and law enforcement patrols. The net effect is less protection of wildlands from severe fires due to the increase in number and frequency of human-caused ignitions, often during extreme fire danger situations.

In terms for fuels management, logging roads break up continuous fuel beds with wide swaths of non-combustible dirt and gravel; however, highly flammable vegetation (e.g. grass, brush, conifer saplings) often grows in the exposed, disturbed sites alongside roads. This accounts for many wildfires being easily ignited by the exhaust or cigarette butts tossed from passing motorists. More significantly, most National Forest roads travel through and to logged areas. Commercial logging produces large amounts of flammable dead surface fuels.(e.g. "slash" and "cull" logs), followed by revegetation from grass and brush, or replanting with young conifer saplings.

The best available scientific research has demonstrated that wildfires tend to spread more rapidly, with higher intensity and greater severity, when they burn through roaded and logged landscapes compared to unlogged roadless areas. Fires entering plantation zones and other intensively managed areas are prone to sudden "blow ups," creating major conflagrations such as occurred on the 1994 Tye Fire in Washington State. (Organization, Eugene, OR - #A21798.30100)

#### **1474. Public Concern: The Forest Service should obliterate any roads or temporary access required for forest health management as soon as possible after the event.**

Wildfire protection: Emphasis should be on immediate detection of lightning strikes and fire fighting from air. One of the USFS fire chiefs told me that roads were not necessary to fight fire in this day and age. I believe this to be true. Roads that are bladed for required fire fighting should be obliterated immediately after the fire. (Individual, Buffalo, WY - #A19769.30200)

I nevertheless believe that fire suppression is appropriate when necessary to prevent a fire from expanding in size to consume more than, say, 20% of the available roadless area or forest. In pursuit of such a goal, the bulldozing of fire lines and other damage associated with fire fighting is acceptable—but only if all evidence of fire fighting is required to be obliterated within the next year. A significant portion of the fire fighting budget should be reserved for this purpose. Likewise, for catastrophic fires that consume more than, say 20% of the available forest, limited replanting should be allowed when, on a case-by-case basis, it is found to be necessary. Once again, however, any temporary access ways created for that purpose should be obliterated within a year. The creation of these temporary access ways does not alter the general rule that developed roads should never be established in roadless areas. (Individual, Pendleton, OR - #A30482.30400)

Healthy forests are not laced with roads. Inventoried roadless areas should be managed under the emergency conditions stated in the promulgated Rule, allowing new roads when there are certain risks to public health and safety from insects, disease, and fire. Only a tiny amount of roadless areas are subject to these combined risks—less than 2% according to the USFS. These areas should be managed in a way that reduces the risks WITHOUT road-building. If a road is absolutely essential because of some circumstance, it should be reclaimed immediately after a treatment is completed, so that the deleterious effects of forest roads on surface hydrology (erosion/excess sedimentation, habitat segmentation, weed invasion, enhanced fire danger, etc.) will not severely degrade the area. (Individual, Sebastopol, CA - #A2353.30100)

Access into and across roadless areas managed as roadless is needed to reduce insect and disease damage on both national forest land and other adjacent forestland. After salvage harvest activities, roads and other temporary infrastructure can be retired. (Business, Seattle, WA - #A20468.30200)

#### **1475. Public Concern: The Forest Service should prohibit vehicles in roadless areas.**

##### **TO PREVENT ARSON AND WILDFIRES**

As for wildfires, keeping both off-road and on-road vehicles out of the forest is among the best ways of preventing arson and wildfires started by man and/or machine. (Individual, Clayton, GA - #A15320.30100)

Many fires are started by people going out on the roads in vehicles, and then leaving unattended campfires, throwing lit cigarettes out their car windows, sparks may come from their muffler, or arson is not an uncommon occurrence. Arsonists are not known to hike deep into the wilderness to start their fires, and in fact often do their satanic deed by throwing flaming material out their car window.

This leaves the roads to administer the rest of the fires that are caused by weather. Consider for the sake of assumption that these fires are in fact a manifestation of weather. Then try to tell me that you can stop the rain!

Fire is a great political football because people want so desperately to believe in certainty and politicians don't get elected by telling people that certainty is an illusion in many cases. (Organization, Arcata, CA - #A21665.30430)

Logging exacerbates fire risk. Road building allows easier access to the backcountry by meth lab operators and other irresponsible individuals whose activities are fire hazards. So-called salvage logging removes the trees that should remain, while destroying wildlife habitat. The Rules as written provide for emergency road building and forest health. (Individual, Seattle, WA - #A17886.30500)

As for wildfires, keeping both off-road and on-road vehicles out of the forest is among the best ways of preventing arson and wildfires started by man and/or machine. Mother Nature did a pretty good job of managing forests for hundreds of thousands of years, I think a light touch from the hand of man would be a fine approach to forest management - it's cost effective too. Also, the build up of "hazardous fuels" is mostly a problem due to forests having been previously altered by logging (slash left on the ground after logs removed) and it is mostly a western forest issue. The Southern Appalachian roadless areas near me are the few areas in the Southeast that have NOT been logged extensively, so the "fuel build-up" is less of a factor in these forests than almost anywhere else in the entire national forest system. (Individual, Atlanta, GA - #A26430.30100)

##### **TO PREVENT THE SPREAD OF PLANT PATHOGENS**

On the Six Rivers and Klamath National Forest off-road vehicle use is a primary vector for spreading the plant pathogens that kill the endemic Port-Orford cedar. (Organization, Arcata, CA - #A21665.31200)

## Timber Removal

### Summary

**General Comments** – Timber removal is a topic of comment to a number of respondents, particularly as it applies to forest health. Several people ask that the Forest Service not allow volume and revenue targets to drive silvicultural decisions because, they believe, commercial harvesting usually takes the most fire-resistant trees.

**Adequacy of Analysis** – Some respondents urge the Forest Service to acknowledge that fuel buildup and undergrowth is a natural part of forest progression and forest ecology. They state that fuel buildup and undergrowth are not a result of timber harvest and that other contributing factors should be considered. At the same time, organization states, “Before any actions are taken to thin and clear, a thorough analysis should be performed which gives the benefits and harms of the actions.” According to another group, scientific evidence does not support the hypothesis that intensive salvage, thinning, and other harvesting activities reduce the risk of catastrophic fire.

**Funding** – Several respondents comment that funding should be allocated for timber removal for forest health management. One individual urges the Forest Service to fund thinning projects. Another individual states, “The increased costs of fuel treatments must be addressed. Eliminating such large tracts of land from motorized fuels and firefighting efforts is a disaster in the making. On one hand we have the agency saying we must greatly increase fuels treatments and now on the other we have the agency virtually eliminating cost effective fuel treatments since motorized access to large areas will be eliminated.” One individual suggests that “previous harvesters should be fined to recover any future loss due to severe wildfires and buildup of hazardous fuels, as well as any insect or disease damage.”

**Timber Removal** – Respondents assert that timber removal should be allowed to reduce wildfire and insects and disease. According to one individual, “There is NO QUESTION that timber harvest has to be returned to the equation to provide for healthy forests which will protect them from insects, diseases, and catastrophic fires.” Respondents also add that timber removal is necessary to restore natural fire regimes and to ensure firefighter safety. People suggest a number of conditions they say should be imposed on timber removal. Suggestions include harvesting only trees that are 24 inches on the stump, trees less than 14 inches in diameter or 50 years old, mature trees which have not yet lost their commercial value, and old growth. People also recommend certain types of removal—including clear cutting, salvage removal, selective timber harvest, and fuel thinning—each type subject to several suggested conditions. Several people also suggest firewood collection be allowed in order to reduce fuel loads and fire hazards.

Other respondents assert that the Forest Service should not use forest health as an excuse to remove timber. These respondents say that timber removal should be prohibited because it increases fire severity and risk. Some specifically request that clear cutting be prohibited. Others suggest that salvage timber harvest be prohibited after fire or insect and disease outbreaks. Additionally, some respondents request that thinning be prohibited in moist or high elevation forests because, they assert, it is cost prohibitive, because silvicultural activities do more harm than good, and because these areas should not be disturbed.

## *Timber Harvest General*

### **1476. Public Concern: The Forest Service should not allow volume and revenue targets to drive silvicultural decisions.**

#### **BECAUSE COMMERCIAL HARVESTING USUALLY TAKES THE MOST FIRE-RESISTANT TREES**

This suggestion should not be construed to support commercial sawlog extraction: the attempt to combine salvage logging with commercial logging in the past has usually taken the fire-resistant live green trees and left the brush which creates the fire hazard in the first place. Volume and revenue targets should not be permitted to drive silvicultural decisions, as they did under the 1996 Salvage Rider. (Individual, No Address - #A4777.30500)

The General Accounting Office noted, ‘Most of the trees that need to be removed to reduce accumulated fuels are small in diameter and have little or no commercial value.’ The report found that Forest Service managers were tending to focus logging on areas with high-value commercial timber rather than on areas with high fire hazards and would include more large, commercially valuable trees in a timber sale than those simply necessary to reduce the accumulated fuels. So called logging for fire protection became logging for the economic value of the timber. (Individual, Puyallup, WA - #A829.30100)

Prohibit the use of commercial timber sales for hazardous fuels reduction projects. Commercial logging removes the most ecologically valuable, fire-resistant trees, yet leaves behind highly flammable small trees, brush, and logging debris. The financial incentives for abusive logging under the guise of “thinning” must be eliminated. (Organization, Nevada City, CA - #A4941.30520)

## *Adequacy of Analysis*

### **1477. Public Concern: The Forest Service should recognize that fuel buildup and undergrowth is natural for forest progression and forest ecology.**

#### **DO NOT PLACE BLAME ON COMMERCIAL TIMBER REMOVAL**

Protecting Forests: The current Roadless Area Conservation Rule adequately addresses issues of fire management. With all the current rhetoric on fires and fire management, it is important to look at the facts in an unbiased way. Yes, the number and intensity of fires have been increasing since the 1950s, and the 1990s was one of the worst decades for fires in recent history. But, when you look at the locations of the fires, it is clear that fires increased in forests and in areas of sage brush, manzanita, chaparral, etc.—ecosystems that do not have trees! The increase in fires can not be blamed on limitations placed on commercial logging. The forest industry is trying to use this highly emotional issue for their own political agenda and profit. (Individual, Reno, NV - #A5109.30400)

#### **CONSIDER OTHER FACTORS THAT CONTRIBUTE TO FUEL BUILD UP**

Fire is a natural thing in forest ecology. Though it is true that there is an increase in combustible substance, as a result of over zealous fire suppression, the degree to which this is responsible for the recent increase in forest fire, is very questionable. In the year 1910 there were more big hot fires, more acres burned, and more fire fighters killed than in any year since, and that was before fire suppression. The 1910 fires were caused by drought, and drought caused by global climate change may well be the major factor in the increase in fires today. After all there have been enormous and unprecedented fires in tropical rain forests in recent years, and this certainly has nothing to do with “Hazardous fuels buildup.” (Individual, Hatboro, PA - #A8834.30310)

**1478. Public Concern: The Forest Service should analyze the benefits and harm of thinning and clearing projects.**

**BEFORE UNDERTAKING ANY ACTION**

Inventoried roadless areas should be given as little vegetation management and protection from diseases as possible. Before any actions are taken to thin and clear, a thorough analysis should be performed which gives the benefits and harms of the actions. Benefits might be a reduction of fire risk to neighboring communities and more suitable habitat for a rare species. Harms might be degradation of habitat for wildlife and loss of aesthetic values. (Organization, Blue Jay, CA - #A29236.31200)

**1479. Public Concern: The Forest Service should consider that scientific evidence does not support the hypothesis that intensive salvage, thinning, and other harvesting activities reduce the risk of catastrophic fire.**

Scientists have doubts about the efficacy of intensive [management] as fire-proofing methods. DellaSala, et al. (1995) state:

Scientific evidence does not support the hypothesis that intensive salvage, thinning, and other logging activities reduce the risk of catastrophic fires if applied at landscapes scales . . . At very local scales, the removal of fuels through salvage and thinning may hinder some fires. However, applying such measures at landscape scales removes natural fire breaks such as moist pockets of late-seral and riparian forests that dampen the spread and intensity of fire and has little effect on controlling fire spread, particularly during regional droughts . . . Bessie and Johnson (1995) found that surface fire intensity and crown fire initiation were strongly related to weather conditions and only weakly related to fuel loads in subalpine forest in the southern Canadian Rockies . . . Observations of large forest fires during regional droughts such as the Yellowstone fires in 1988 (Turner, et al. 1994) and the inland northwest fires of 1994 . . . raise serious doubts about the effectiveness of intensive fuel reductions as “fire-proofing” measures. (Organization, Missoula, MT - #A613.30500)

*Funding*

**1480. Public Concern: The federal government should fund Forest Service thinning projects.**

**TO REMOVE FUEL BUILD UP**

I feel that the Federal Government needs to better fund the Forest Service to allow removal of underbrush that tends to turn into the very fuel that sustains major wildfires. (Individual, Colorado Springs, CO - #A22203.30100)

**1481. Public Concern: The Forest Service should address the increased costs of fuel treatment.**

The increased costs of fuel treatments must be addressed. Eliminating such large tracts of land from motorized fuels and firefighting efforts is a disaster in the making. On one hand we have the agency saying we must greatly increase fuels treatments and now on the other we have the agency virtually eliminating cost effective fuel treatments since motorized access to large areas will be eliminated. (Individual, Alturas, CA - #A28581.17220)

**1482. Public Concern: The Forest Service should fine previous timber harvesters.**

**TO RECOVER ANY FUTURE LOSS DUE TO SEVERE WILDFIRES, BUILDUP OF HAZARDOUS FUELS, AND ANY INSECT OR DISEASE DAMAGE**

Previous harvesters should be fined to recover any future loss due to severe wildfires and buildup of hazardous fuels, as well as any insect or disease damage. (Individual, Boise, ID - #A674.30700)

## Allow Timber Removal

### 1483. Public Concern: The Forest Service should allow timber removal.

#### TO REDUCE FIRES, INSECTS, AND DISEASE

I support reopening the forests to logging and reopening of closed roads to protect our forests from wild fires and using the forests for wood production. Without the loggers cutting old timber and clearing heavy brush that has almost made all of our remaining forests a fire hazard and severely reduces the usage of the forests. The Forests were in much better condition while logging was the rule and I would hope that good logging practices will help our forests recover from the last ten years of attack by environmental wackos. (Individual, Young, AZ - #A1083.90510)

There is NO QUESTION that timber harvest has to be returned to the equation to provide for healthy forests which will protect them from insects, diseases, and catastrophic fires. Areas in high altitudes, areas adjacent to streams or areas which would be subject to extreme erosion should not have logging or road building in them. However, harvest of all dead and dying timber outside the above categories should be immediately put into a sales program that forbids appeal by any and all environmental groups. (Individual, Whitefish, MT - #A5102.30100)

As a former USFS employee on the Davy Crockett and Angelina Ranger Districts in the National Forests in Texas, I can tell you that I am well aware of the areas that have already been set aside in the RARE I and RARE II programs, and it is a travesty as to what has happened to those areas due to the "no management" policies. We have seen both the designated Four Notch and Indian Mounds wilderness areas obliterated by Southern Pine Beetle infestation, and grow back in briar patches that even my dog has no desire to explore.

When we should be harvesting these trees in an effort to control mortality due to insect infestations, we are instead allowing the dead and dying trees to rot, and entering healthy, less mature forests, for timber harvesting to supply our nation's needs. (Individual, No Address - #A5081.30100)

Management to achieve this type of forest [uneven aged] should be by regulated harvest and stocking control over most of the existing non-Wilderness, presently roadless areas, but may be by prescribed burning. The latter is dangerous if not preceded by a thinning harvest, and if dead, unconsumed timber is left following the burn, those downed and standing dead trees will and to the fuels, available and ready to burn, for decades, even a century or more, to come. We cannot set up our forests to experience severe wildfires such as we experienced in Yellowstone Park in 1988. These large, very hot fires are just to damaging to the soils and to the watersheds where soil erosion and stream course damage exceed anything normally experienced from proper forest harvest and management. (Individual, Evergreen, CO - #A19178.30400)

It appears that the current management of the forest involves a leave-alone policy in terms of downed and dead trees. The other strategy that appears to be applied is controlled burning. While nature allows for the forest to develop wildfires of all sizes as well as the development of insect and disease outbreaks, it seems that a policy of letting nature be nature in this case may not be entirely in the interests of the environment. Having experienced the ash fallout and smoke from the Yellowstone fire of the late 1980s while living in Billings, MT, and the recent bout of fires here in Southern Oregon, I must say that a significant amount of air pollution and carbon dioxide emissions are produced by these fires which can't be good for the environment, particularly the air quality. It seems that a controlled harvesting of downed and dead trees would be appropriate to manage the risk of out-of-control wild fires. This would have to be balanced with the need to prevent soil erosion, particularly on hillsides. (Individual, Klamath Falls, OR - #A6931.30500)

Harvest of forest products for fuel reduction and forest health is an option in many cases. Modern equipment can often remove high-risk material without roads. Few roads are needed to accommodate harvest today. Also, managing roadless areas to retain their roadless character does not preclude the use of managed fire or application of chemicals for insect control. (Individual, Cloquet, MN - #A8272.30100)

Maybe you'll just have to drop the idea of "roadless" as a primary "value" to be protected. As fuel loads are the primary factor in the intensity and spread of fire, the wood must be extracted in some manner. And HRV data literally screams "removal." There is no way to precipitate a natural fire when base fuel loads are profoundly unnatural. Again, Moose Fire.

It is my guess that once the Moose fire is controlled, the burned timber is going to be in the billion-board-foot range. That is a TERRIBLE waste, ten years of wood at the old ASQ, and 20 years worth at the latest, litigated and never-met ASQ. We no longer have the local mill capacity to absorb even a small part of that timber...we might get a third of it in two years IF the remaining sawmills converted fully over to that wood.

First, wood is often too heavy to be flown, and ground-based equipment is often the only economic option.

Second, ground based equipment such as forwarders are specifically designed to reduce soils compaction.

Third, many forests have a climactic interval called "winter." It is very possible to build ice roads such as on the North Slope for haulage. (Individual, Whitefish, MT - #A20672.30110)

#### **TO RESTORE A NATURAL FIRE REGIME**

The Forest Service should restore a more natural fire regime wherever possible and where necessary cut down ladder fuels (brush and small diameter trees) and allow decomposition. Roads are not necessary to accomplish these activities. (Organization, Auburn, CA - #A20801.30310)

Your studies have concluded that commercial logging (removal of larger trees) in over-dense stands actually INCREASES the risk of catastrophic fires and that the best way to deal with these areas is through cutting of the smallest trees and restoration of a natural fire regimen. (Individual, Roseville, CA - #A10567.30100)

#### **TO ENSURE FIREFIGHTER SAFETY**

I suspect it could be argued that the failure to selectively harvest the timber lands with controlled burning of slash piles and various forest debris could have contributed heavily to the exploding fire front which claimed the lives of my friends. (Individual, Kalispell, MT - #A8758.30550)

There is no guarantee that removing dead trees will prevent forest fires, But there is no doubt that responsible logging can greatly reduce the impact of wildfires.

Studies conducted by the forest service have shown that areas that have burned take 100 years longer to recover and become productive than areas that have been logged and restored as per government guidelines.

It seems to make a lot more sense to have someone pay to cut down the dead trees and use them to provide jobs and building material, than to pay someone to try to extinguish the same trees when they have become a wildfire and a threat to life and property.

There has been a rumor going around here that 4 firefighters lost their lives to save a sucker fish because of the stringent guidelines in the roadless rule. If this is in fact a true story, we are in a sorry state. People are more important than trees, fish, birds, or any "rare or old-growth species". (Individual, Centerfield, UT - #A12776.30320)

**BY REMOVING 24" TREES ON THE STUMP AND USING THE MONEY TO PAY FOR ROAD REPAIR**

Have a forester go in and mark the trees to be cut. Cut only 24" on the stump and use the money to help pay for road repair—this will also help the fire access. Can also do this on military installations. (Individual, Normandy, TN - #A11315.30200)

**BY REMOVING TIMBER LESS THAN 14 INCHES IN DIAMETER OR 50 YEARS OF AGE**

Little if any mechanical treatment should be needed in most roadless areas, and then only to protect large overstory trees or to provide defensible burn perimeters. Any tree removal should be of younger, small-diameter trees, less than about 14 inches in diameter or 50 years of age, and they should be left on the site or burned in piles if necessary. The existing roadless rule gives local forest managers discretion, on a site-specific basis, to thin small-diameter trees where needed to restore ecological processes, provide habitat for endangered species, and avert catastrophic wildfire. (Organization, Seattle, WA - #A21694.30100)

**BY REMOVING MATURE TREES BEFORE THEIR COMMERCIAL VALUE IS GONE, ACCOMPANIED BY CONTROLLED BURNING TO REDUCE FUEL**

Healthy forests can exist in a climate of forest management, if older trees are removed before their commercial value is gone. Removal can be done by helicopter or nearby roads. Burning should be a forest management tool, that could be used following all lumber cutting to clear underbrush and trimmings, as well as prescribed burning on non-timber usable lands. Diseased and insect infested trees should be removed, either by burning or commercial timber removal which would be followed by burning of underbrush and tree trimmings. (Individual, Layton, UT - #A30536.30100)

Forest management includes harvesting mature timber that has commercial value before it reaches the dead and dying stage where removal is not cost effective. (Individual, Princeton, WV - #A18086.30200)

As a nation we are worried about global warming and air pollution. How can we justify letting millions of acres of a valuable resource go up in smoke? How can we justify spending billions of dollars fighting fires when we could have generated money from timber harvest? (Individual, Moyie Springs, ID - #A30047.30300)

**BY REMOVING OLD GROWTH**

As you know old growth timber should be harvested to be utilized and to prevent forest fires. (Individual, Buffalo, WY - #A15052.30520)

**BY REMOVING EVERY SIXTY YEARS AND CLEARING UNDERBRUSH EVERY TWENTY YEARS**

In regards to the management of roadless areas, we believe that careful harvesting and cutting is needed to ensure a healthy forest. A forest that is cut occasionally is actually healthier than one that is not harvested. This is because excess wood and brush build up, making it a prime target for a forest fire as seen in the west these past few years. If fire prevention techniques included clearing out the underbrush of a forest, they would not have become powder kegs of disaster.

Therefore, we believe that underbrush should be taken out every twenty years and cutting should be done every sixty years. (It takes approximately 60 years to grow a forest suitable for cutting). During these "cleanings," the wildlife should also be tested for disease and any foreign species (such as the gypsy moth) that is detrimental to the native flora and fauna. Also, current practices involving endangered species and damage to the ecosystem should be followed. In essence, we support that the land [should be] managed for the current goals of sustained yield and multiple usage. (Individual, Harrisonburg, VA - #A30138.30510)

**BY ALLOWING SMALL SCALE TIMBER REMOVAL**

The only logging I wish to see would be by small-scale family operations for the purpose of thinning and fire reduction, and disease control, with essentially no new roads. I would favor helicopter logging. Local forest planning can address these issues, with public input. (Individual, Manhattan, MT - #A671.90510)

If they are “declared” roadless, even though unofficial routes exist, they should be left open (depending on individual circumstances) for recreational use and fire suppression (within reason) but highly disruptive uses (such as logging) should be banned. The only exception to logging would be sales of SMALL trees (poles, firewood, etc.) on a small scale. This would probably do more good than harm. (Individual, Sandia Park, NM - #A26171.30100)

#### **BY IDENTIFYING AND REMOVING TIMBER THAT CAN BE HARVESTED WITHOUT ENVIRONMENTAL HARM**

For many years I have used the Flathead Forest for my primary recreation and feel that I am familiar with it. There is a lot of land that should never be roaded for various reasons. Much of it is too steep and too high to be suitable for timber production. But it seems that the land has been adequately protected by existing laws and regulations. There is no question that much of it is more valuable for recreation, watershed, wildlife, etc. But in our area, and I assume in others, there is land that was included in the original Roadless Inventory that was roadless for no other reason than that it was burned in the early 1900s and is just now maturing into merchantable timber. Even though it is difficult to do, an attempt should be made to identify these lands that can be logged without environmental harm. Typically, it is a dense lodgepole forest, of little use for much of anything, certainly a poor place for recreation or wildlife production. But it is an ideal site for a large, extremely hot fire. (Individual, Bigfork, MT - #A1079.45400)

Use sustainable and lower impact logging such as selective logging and the use of draft horses rather than machines. Encourage local, independent loggers if you want to reduce the fuel load. Kick the timber corporations out of our forests. (Individual, Bozeman, MT - #A27944.30520)

Remember, man is limited in his physical abilities and needs access to do his work. We now have low soil impact machines and new harvest systems, that can do the job. We have the technology, but we need the roads to be effective and safe. (Individual, Sula, MT - #A3022.30100)

#### **BY EMPLOYING SUSTAINABLE TIMBER HARVESTING TECHNIQUES FOR FOREST HEALTH**

If roadless areas have not previously been logged (which is generally the case), there should not be any significant fuel buildup. It is clearcutting that creates the undergrowth that builds up to hazardous fuels in the first place. If all national forest logging was done sustainably (i.e. selective removal with minimal to no road building rather than clearcutting) we would not have nearly the level of fire problem that we do at present. Private companies that have historically engaged in selective removal, leaving large as well as small trees behind, have had significantly less problem with wildfires than lands that have been clearcut. Insects and the diseases that they carry are similarly much less of a problem in a healthy forest since natural predators keep the insects in check. Clearcutting throws the ecosystem out of balance, destroying the habitat of some, but not all species, and leaving other species without any predation. This leads to problems with disease as well as overpopulation of particular species, such as some disease carrying insects. (Individual, Sunnyvale, CA - #A20760.30100)

#### **WITH HELICOPTERS**

The Forest Service must also modify the policy so that it adequately addresses the very real forest health crisis that threatens millions of acres of our National Forests. Careful but active forest management, guided at the local level, is the best way to ensure that these forests are truly protected for the long term. Some logging should be done in roadless areas to reduce the build-up of bark beetles and to harvest dead and dying trees. This will reduce the fuel build-up that could sustain a major forest fire. In roadless areas, the only way this can be accomplished is with helicopter logging. This is expensive and often results in a deficit sale. The expense of this type of logging is nothing compared to the expense of a major forest fire. Local forest level decisions, supported by accurate, site-specific information, are the best way to conserve national forests. (Association, Princeton, ID - #A27994.30100)

The Helicopter Logging sector provides an efficient and valuable means of harvesting timber, in addition to providing invaluable service in all aspects of Forest Management—especially in the ancillary Firefighting role, to which it finds itself applied every year. The availability of the firefighting services

we provide may be severely compromised if the foundation of our business is removed by the curtailment of timber harvesting operations. (Business, Juneau, AK - #A30599.30910)

If there is to be logging for bug kill, etc., the logging should be aerial. (Individual, Missoula, MT - #A6141.31223)

We strongly believe that we keep the option open to carry out forest health projects in roadless areas. In most cases this can be carried out economically with aerial work and leave the area roadless. In some areas the distance might be too far to a road or the values of the material you are removing so low the normal timber sale process will not pay for the work. This is the situation in which areas were ignored for too long and the fuel loading was allowed to build to the dangerous reels it is at today. In these cases the work can still be done by aerial means or prescribed fire, (very dangerous now), but the government will have to pay for the work with general funds rather than sale of products. This is too bad and did not have to happen, but often agencies like the USFS are led off their mission by political agendas. (Business, Portland, OR - #A10558.30100)

#### WITH HORSES

If wise forest management requires some logging due to fuel build up near homes, for instance, selective logging by horse teams creates jobs and minimizes negative impacts on area communities, wildlife, and forest users. It does not require creation of new roads, and is possible on steep land difficult and excessively expensive to build roads on. (Elected Official, Bozeman, MT - #A27736.30200)

### **1484. Public Concern: The Forest Service should reduce the basal area index of stands of trees.**

#### **TO MAKE TREES MORE RESISTANT TO INSECTS AND DISEASE**

Roadless Proposal will significantly reduce USFS ability to restore Forest Ecosystems Health. Restoring forest ecosystem health can be accomplished by improving the resistance of trees to insect attack. This is accomplished by reducing the "basal area index" of stands of trees. Stands with the appropriate basal area index will have healthier trees enabling them to be more resistant to attack from endemic populations of beetles. Appropriate thinning of timber stands has the same effect as thinning carrots or apples. Thinning provides more sunlight, space, water and nutrients to those remaining, which allows these individual trees to be stronger, healthier and more resistant to insects and disease. Too many individuals in too close to each other weakens all of the individuals and creates conditions for rapid disease spread. Such is the condition of our forest ecosystems. Tree mortality from insect epidemics are rampant on most national forest in the west, particularly those in Utah. Elimination of fire and reduction in appropriate amounts of timber harvest have increased the amount of biomass by as much as 25% in just the last 10-15 years. Options within this Roadless proposal to eliminate timber harvest as a management tool are not appropriate. It appears that national presidential political motives not scientific motives have singled out the timber industry and are attempting to eliminate it as a management tool for the USFS. (Professional Society, No Address - #A27584.30200)

### **1485. Public Concern: The Forest Service should allow clear cutting.**

#### **IN LESS THAN FIVE ACRE, WIDELY DISPERSED PARCELS**

Any clearcutting should be in small, less than 5 acres, widely dispersed parcels. (Individual, Kalispell, MT - #A19138.30100)

### **1486. Public Concern: The Forest Service should allow salvage removal.**

#### **FOR FOREST HEALTH**

**Protecting forests:** Forests are subject to largely unpredictable catastrophes in the form of windfall, fire, and insect attack. Management should have the flexibility to do prompt salvage when needed for fire

hazard abatement or prevention of spread of insect infestations, particularly in the vicinity of private or state lands or national forest land in other categories. (Individual, Olympia, WA - #A811.30100)

Furthermore, there should be direct provision for salvage harvest in any area where a fire occurs and salvage is feasible or in areas where insect damage has created a non-functioning forest environment and increased the danger of catastrophic wildfire. (Association, Murphy, ID - #A18024.31220)

Now after seeing the two months of raging infernos a recent poll shows almost 90% of the locals think the fire killed timber should be removed, even in the roadless areas, in order to reduce fuel loading for the future. Of course much of the fire could have been prevented if forest health programs had been carried out. So in summary, take charge of forest health and use all the tools you have at your disposal to take good care of our roadless areas. (Business, Portland, OR - #A10558.30100)

Another reason to continue logging in the Manti-LaSal National Forest is because millions of Engleman spruce pine trees have been killed by the "spruce beetle." It has been estimated that 350 million feet of Engleman spruce are dead. Carl Alsup, Operations Manager, at Satterwhite Log Homes, said "right now there is enough dead pine trees in the Manti LaSal National Forest to keep us in business for forty years." There is nothing to kill the beetle or prevent it from killing the pine-trees. The only solution is, two to three weeks of -20F or -30F degree weather. The beetle is continuing to spread north through the mountain range, causing devastating amounts of pine trees to die. Keeping the roads open will help the loggers get into areas where they can harvest the dead timber. Removing this dead timber will help allow for regrowth and get rid of the dead Engleman spruce pine trees. (Individual, Manti, UT - #A20336.31223)

#### **AS SOON AS POSSIBLE AFTER A FIRE**

In case of a wildfire in a National Forest, the Forest Service needs to expedite the sale of the dead and dying timber. In other words, allowing salvage operations to begin as soon as possible and no later than sixty days after the fire. The following spring, re-planting of the burned area needs to begin. (Individual, Kamiah, ID - #A5419.30400)

#### **TO UTILIZE THE TIMBER BEFORE IT ROTTS**

The use of fire burned timber has not been fully utilized and needs to be sold for lumber before it rots and becomes useless. (Individual, Kalispell, MT - #A20334.31120)

I am writing to support a change in the Forest Service's Roadless Area Conservation Rule. Our forests are renewable resources, and should be used, not just "locked away" for the trees to die, the bugs to eat them, and fires to destroy untended and over-grown areas. Trees are a useful product. Old trees, dead trees, infected trees should be culled and selectively logged -- so they can be used, not wasted -- and new seedlings should be planted to allow regeneration and regrowth of this renewable and useable resource. (Individual, Kamas, UT - #A8901.30100)

#### **TO THIN OLD GROWTH**

I am deeply concerned that the ecological objectives of the Northwest Forest Plan will not be met if the current trend of decreased budgets and facility consolidations continues. There are millions of acres of second-growth forests within late successional and riparian reserves that, according to scientists at the PNW Research Station, will not develop the old-growth characteristics needed in these areas without being thinned.

In April 2001 . . . the PNW Research Station concluded:

"Future projections for young, dense forest stands in late successional reserves strongly suggests that they are not likely to develop late successional old-growth habitat or biodiversity conditions through passive management. Without active management, substantial stand-resetting events (fire, blowdown, insects) will likely be required to establish trajectories that lead to late successional old-growth habitat and biodiversity conditions." (Individual, No Address - #A2312.30100)

[The PNW Research station] has identified millions of acres within late successional reserves that are in need of thinning. He identified 152,000 acres on the Olympic National Forest, 122,000 acres on the Gifford Pinchot National Forest, 370,000 acres on the Shasta-Trinity National Forest, as well as 300,000 acres on the Siuslaw National Forest. (Individual, No Address - #A2312.30100)

#### WITHOUT CREATING NEW ROADS

I have no problem with some thinning where appropriate for new wildlife areas and to help the forest regain a healthy status after years of fire suppression. However, any thinning efforts must not create new roads. Where tree thinning is allowed, it is important to cut the small, weak trees and leave the larger healthy trees in the forest. A market may need to be created for less desirable wood—I can't believe it's not useful. (Individual, Silverthorne, CO - #A28101.30530)

#### WITH ENVIRONMENTALLY FRIENDLY TECHNIQUES

Inventoried roadless areas can be managed to provide for healthy forests by using the least intrusive management strategies available today. For example, thinning operations may be conducted in snowy seasons using rubber-tired tractors for skidding that not only leave no trace, but reduce fire loads and encourage a healthy mosaic of a diversity of tree species. Best of all, thinning in this way benefits the small operators in the tiny towns of the West and adds to a diverse, sustainable economy. (Individual, Pinedale, WY - #A26289.30530)

#### IN AREAS WHERE INSECT AND DISEASE OUTBREAKS WILL BE INTENSE

In Southeast Alaska, the issue of protection involves insect and disease damage that is endemic to this region. Occasionally there are localized outbreaks that are identified by the State and Private arm of the Forest Service in cooperation with the state extension service. In locations where outbreaks are or will become intense, access to them should be provided for salvage operations. Over the relatively long forest rotations contemplated for a cool climate forest such as the Tongass NF these proactive salvage operations will have an impact little different than areas of blowdown largely because the Tongass NF was largely formed by blowdown due to storm events. (Business, Seattle, WA - #A20468.31223)

### 1487. Public Concern: The Forest Service should allow selective timber harvest.

Forests need to be selectively harvested. Harvested areas provide barriers to fires that would otherwise spread at a rapid rate. Harvested areas provide a safe-haven for animals when fire occurs. (Individual, Aptos, CA - #A16303.30520)

As a forty plus year professional forester, I want to express my concerns with the attempt to create more roadless areas in the National forests.

First and foremost is the overwhelming need to address the forest health and fire risk issue on USFS lands. Anyone who views the National forest with an objective eye can see the dead, down and dying overstocked forests that have been created by decades of fire protection with no fuel management. This is an unnatural condition that has allowed shade tolerant species to overstock the eastside pine forests and severely overstock westside forests, and is leading to severe bug kill like the Spruce Budworm epidemic that is creating a fire trap on White Pass in the Gifford Pinchot Forest in Washington and most of Oregon's eastside forests.

The only answer to this problem is fuel removal through selective thinning that leaves the best most vigorous trees, followed by controlled burning to eliminate the slash and understory debris. This process can restore a healthy forest that can survive light burns, but to be economically feasible roads are necessary to carry out the thinning job. These roads can be blocked off for vehicle traffic for several years between thinning entries, but still available to fight fire, if necessary.

We have seen many examples of the USFS simply letting forests be destroyed by fire when no road access was available. This is a senseless waste of the forest resources, wildlife habitat and the economy of many Western State communities. (Association, Longview, WA - #A10556.30200)

### TO KEEP FORESTS THINNED AND FIRE FREE

“I believe logging should be your first priority to keep forests properly thinned and fire free. (The proper phrase for the type of logging I am talking about is called, ‘select logging,’ not ‘clear cutting.’ It appears some who work for you don’t know the difference). If you must have roadless areas (and frankly I don’t see the need), loosen the laws to allow some roads to be built for a specific purpose and then remove them. This can be done without harming the environment.” (Individual, No Address - #A834.30000)

### TO REMOVE DEAD AND DYING TIMBER

There are thousands of acres in which SELECTIVE logging practices can be employed as a thinning process to clean up the dead and dying as well as small timber which can provide material for pulp and studs. Destruction of roads to establish a bogus wilderness is ludicrous.

Non-appealable sales for selective logging and cleanup of underbrush and small timber is all that will be needed. (Individual, Whitefish, MT - #A5102.30100)

Selective cutting of diseased or dying trees with chipping of slash should be practiced. (Individual, Kalispell, MT - #A19138.30100)

### TO PROVIDE BARRIERS TO FIRES AND PROVIDE A SAFE HAVEN FOR WILDLIFE

The best way to maintain healthy roadless areas is by establishing roads—not establishing roadless areas! Roads become firebreaks, and allow emergency equipment to gain access. Forests need to be selectively harvested. Harvested areas provide barriers to fires that would otherwise spread at a rapid rate. Harvested areas provide a safe haven for animals when fire occurs. (Individual, Cottage Grove, OR - #A23450.30100)

## 1488. Public Concern: The Forest Service should thin fuels.

### AS NECESSARY

Roadless areas should be thinned as necessary to prevent fires, or be allowed to burn when Mother Nature starts a fire - just be sure to build a large fire break around it. (Individual, Helena, MT - #A150.30400)

What about the wilderness and parks? In most, the trees are thick and there isn’t much feed so the animals come down to the logged areas. The elk, deer, wolf, bear and lions will move—in that order so there aren’t that many animals in the wilderness. If the logger moves into an area, the elk and deer move with them. When they get deep snow in West Yellowstone, the elk, deer, buffalo and antelope come into the town of Gardner, Montana. They lay under your window of the motel, cross the street and cars have to stop for them. They walk down the sidewalk and people walk around them. Then, in the spring just before calving, they all leave town. So, if they thinned all these wilderness areas, all animals would adjust and it would be better for the people and the animals. A good environmentalist is one who takes care of the trees by thinning as well as logging marketable trees. This allows for new growth for the next generation of trees. (Individual, Bonner, MT - #A958.30530)

RACR permits thinning of small diameter trees when this is truly necessary to restore forest health and ecosystem quality. Such thinning and removal can occur in roadless areas using horses or helicopters, if deemed ecologically advisable. (Individual, Macomb, IL - #A15592.30400)

### TEN PERCENT EVERY TEN YEARS

Thinning of no more than 10% every 10 years is an acceptable practice for some areas where harvesting is desirable. (Individual, Olympia, WA - #A441.30530)

### YEAR-ROUND

Forest thinning should be practiced intensively, year-round. Clinton ignored three (3) studies warning to reduce National Forest fire-load build-up . . . resulting in the terrible fires of 2000.

Build roads...thin timber . . . cull constantly . . . harvest with common sense . . . consult loggers, lumber industry. (Individual, Port Angeles, WA - #A652.30530)

#### **THIN TREES AND BRUSH LESS THAN TEN INCHES IN DIAMETER**

By thinning trees and brush < 10 inches in diameter. (Individual, Penn Valley, CA - #A12007.30510)

#### **ALLOW RESTORATION THINNING PROGRAMS**

In the Intermountain West and in the Pacific Northwest, what is needed are restoration thinning programs to restore abuses caused by "local decisions" to high grade and log old growth respectively. In the area of the Northwest Forest Plan the thinning of LSRs is only 15% of annual requirements. The time window on these thinnings is a decade or two at the most. Thinning and restoration programs would take many more local jobs. The logging companies, however, covet the big fat pumpkin old trees, and the local National Forests are glad to oblige. They cut the old trees, build more roads, same old ruin more views, damage more watersheds, deceive the public with buffer strips and on and on. You cut trees in roadless areas where I hike and destroy alpine vistas I love. I'm sick and tired of this sort of local "help" which destroys my national forests. Show me that you can do some real restoration work and preserve what is left in our inventoried roadless areas and unroaded areas. (Individual, Corvallis, OR - #A13493.30130)

#### **PILE THE BRUSH AND BURN IN THE WINTER**

Roadless areas should be thinned with the brush piled and burned in the winter after the snow. The areas that are set aside for no logging should be cleaned of brush and burned. (Individual, Forest Ranch, CA - #A5944.30531)

#### **TO REDUCE UNNATURAL FUEL LOADS IN ROADED AREAS**

So we've determined that clearcuts are out, and moist or high elevation forests don't need thinned. Therefore, it is critical to understand that the entire thinning argument must be confined to the drier ponderosa pine and Douglas fir forests. Now if there is one thing the Forest Service must have learned by now, it's that they can't manage wilderness. Decades of active management through fire suppression, logging, grazing, and road-building have produced the forest health crises Western politicians are so fond of speaking of. Therefore, the Forest Service must *stay out* of roadless areas so they don't destroy those too. I recognize that past mismanagement has produced "unnatural" fire regimes, but the impact is much more intense in roaded, logged, and heavily grazed areas near roads. Therefore, I support thinning to reduce unnatural fire loads, but only in roaded areas. Roadless, wild forests still have the most natural fire regimes in the forest and active management will only muck things up. New forest plans must allow natural fires to burn through wild forests in order to restore natural fire regimes and abandon their war-like attitude toward natural fires. (Individual, Pullman, WA - #A6234.30530)

Protecting Forests. The inventoried roadless areas should be managed with no additional roads allowed. Any timber harvest should use roadless methods only. Precommercial thinning should be encouraged as long as slash is disposed of, otherwise increased fuel loading will exacerbate the already critical situation. Prescribed fire should be utilized wherever it is safe to do so. (Individual, Salmon, ID - #A8830.30100)

Except perhaps for lightning fires, fires are more likely to begin in populated, developed, and disturbed areas. Fires don't usually cause devastating damage in roadless areas due to water retention of large trees, multi-layered canopies so fires don't often burn the tree crowns, and because there is no logging slash, further drying by herbicide spraying, or pioneer brush and conifer plantations in the area because roadless areas are quite undisturbed. Most of the very serious damage done to ancient forest/roadless areas by fire are due to firestorms which enter these areas from over-managed areas in the region. So, appropriate brush management and targeted trimming and thinning in the urban/wild interface is the key. Plans to thin currently roadless areas will INCREASE rather than decrease FIRE RISK in those areas and in adjacent areas!!! (Individual, Los Angeles, CA - #A17161.30430)

**IF STUDIES INDICATE THINNING IS BENEFICIAL**

Selective thinning of small diameter trees and brush may be appropriate in areas of high fuel buildup. Scientific studies are in process to see if this procedure is helpful. Widespread thinning should not take place until the results of scientific studies indicate that this is a beneficial process. (Individual, Gallatin Gateway, MT - #A19100.30530)

**WITHIN A HALF MILE OF MAJOR DEVELOPED AREAS**

Limited thinning of trees within a half mile of major developed areas might be acceptable, if the thinning is done to lower fire risks and not to provide logs for the timber industry. It's ridiculous to log generally throughout the forest to "protect" developed areas. That's simply another logging-oriented scam. Another major natural event which should be considered is protecting private property and streams from land and mud slides caused by logging activities, such as those which occurred in the Bitterroot last summer. That means keeping logging activity off steep hillsides, including such oxymorons as erosion preventing logging and other erosion causing activities. (Individual, Libby, MT - #A14047.30530)

**IN THE URBAN INTERFACE AREA**

The only forests that should be intensively managed (thinned) are those on the urban-natural fringe. Only employ thinning on the boundary (within a mile or so) of private structures. (Individual, Hampton, VA - #A16453.30530)

**IN WILDERNESS AREAS**

After logging, the grass comes in and grows feed for the animals and a new crop of trees come up. But this only lasts for so many years. The new trees get so tall and shade the grass and then the grass dies. So the grass is gone. Then, the animals move to a new logged area. So everything goes hand in hand. Trees that grow up with space around them have branches from the ground up. Therefore, the tree has lots of taper. The trees that grow close enough together to shade the lower branches, the lower branches die. These trees have a lot less taper. If the wilderness were logged and thinned out, there would be better feed for the animals and it would be better hunting. And, there would be roads to care for the forest. (Individual, Bonner, MT - #A958.30100)

**1489. Public Concern: The Forest Service should allow firewood collection.****TO REDUCE FUEL LOADS AND FIRE HAZARDS**

Try to have firewood seekers remove the fallen trees first, reducing fuel for forest fires! (Individual, Laramie, WY - #A7315.30510)

Do not close existing roads!! Allow for private citizens to cut firewood! This helps keep fuel load down. (Individual, Fillmore, UT - #A11442.30510)

Firewood permits should be given free to the public in areas where dead trees pose wildfire dangers. Local convicts can cut firewood for the elderly and disabled. (Individual, Prairie City, OR - #A15474.30510)

And there should be more open options on firewood gathering of dead and/or fallen timber. This in itself would assist in the removal of wildfire ground fuel and would be of help in fighting forest fires. (Individual, No Address - #A29887.30510)

Species and spacing uses mechanical methods or prescribed fires to thin thick stands of less drought-tolerant, less insect-resistant species. Fire must only be used after thinning and reduced fuel loadings have created enough areas or strips across the landscape so that catastrophic fires are less likely. It is critical to prioritize species and spacing the fuel reduction work. Roadless areas represent the lowest of all priorities and least appropriate areas for this kind of work for many reasons. (Individual, Olympia, WA - #A20849.30500)

**ALLOW FARMERS, RANCHERS, AND LOW-INCOME PEOPLE TO HARVEST, AT NO COST, DISEASED, DAMAGED, OR EXCESS TREES FOR FIREWOOD RATHER THAN USING CONTROLLED BURNING AS A FUEL REDUCTIONS TOOL**

There must not be any more controlled burns. If the forest gets too thick, twice a year the Forest Service should go in and plainly mark all diseased, damaged or excess trees. This should be done when the snow melts and before it flies again. Farmers, ranchers and poor people should be allowed in to cut free firewood under the supervision of the Forest Service. Or the Forest Service should do it themselves. This will cost some money, but it's cheaper than fighting a huge conflagration. If you cut it and gave away free firewood that would promote good will. (Individual, San Diego, CA - #A1614.30000)

Management is the key to forest problems. Right now the Forest Service personnel are so busy doing paperwork they don't have time to go out and manage the Forest areas that need help. Look at the fires all over the West in the past several years. All that wood is burned up - it might have been used for something? My elderly neighbor who can't afford too much now can't get the wood she has gotten in the past because of restrictions in the Manti LaSal National Forest. (Individual, Spring City, UT - #A21137.30100)

**1490. Public Concern: The Forest Service should allow hand removal of woody debris and small diameter understory trees.**

Inventoried roadless areas should be managed using site-specific analysis. Fire and fuels treatment methods should be used that protect the roadless values while also reducing the fire hazard. Methods such as hand removal of woody debris, prescribed fire and preferably hand-removal (rather than mechanical) of small-diameter understory trees can be used on a site-specific basis to deal with both fire hazards (restoring a low-intensity fire regime) and forest health issues. (Individual, Pearblossom, CA - #A28121.30400)

**1491. Public Concern: The Forest Service should create defensible fuel zones.**

**WITH PROFITABLE TIMBER SALES CONDUCTED WITH OVER-THE-SNOW EQUIPMENT**

Break up the damned fuels! Sure, the interface fuels are first priority, but here on the FNF [Flathead National Forest], despite a request from the community, staff hasn't even begun scoping on a fuels management strategy for the forest. There are drainages out there with such severe fuel and disease vectors that heavy management **MUST** be started with an eye toward creating defensible fuel zones. If these zones can be created with profitable timber sales conducted with over-the-snow equipment, it should be done, and done yesterday. (Individual, Whitefish, MT - #A13242.30510)

*Do Not Allow/Restrict Timber Removal*

**1492. Public Concern: The Forest Service should not use forest health as an excuse to remove timber.**

**DO NOT CLAIM HARVESTING IS NEEDED TO REDUCE INSECT INFESTATION**

Insect infestation is not an excuse to log. Insect infestation tends to occur in forests that are not healthy. Forests that have been fragmented by roads, reduced by logging and weakened by grazing have less chance of combating an alien insect invasion. Healthy, intact forests are very resilient and generally do not have a problem with insects. (Individual, Sequim, WA - #A4527.31210)

**DO NOT CLAIM HARVESTING IS NEEDED TO REDUCE FUEL BUILDUP AND UNDERGROWTH**

Fire and insects are a natural part of the forest ecology. Insect and disease outbreaks have been increased as a result of past logging replaced by genetic monoculture. Forests are at their strongest when they are left alone. Forests that have been logged in the past often do have dense undergrowth which is prone to causing more intense fires. This is not 'hazardous fuels'. Instead it is the natural progression of forest ecology. Old growth forests are much more bug and fire resistant than second growth forests that have never been previously logged and therefore dense undergrowth should not be an issue. Clearly, this is a

public relations attempt to promote cutting the trees to save them. (Individual, No Address - #A6761.30100)

Another paradox: applying effective fire suppression/exclusion results in an increase in fuel hazards and potential fire severity, and a decrease in biological diversity and ecological integrity. The forests most in need of vegetation and fuels treatments to reduce fire hazards, insect and disease outbreaks, and restore biological diversity are not roadless areas, but rather, areas that have already been roaded and logged. Building roads allegedly for the purpose of “forest health restoration” or “fire hazard reduction” only makes sense if mechanical thinning as a tool for fire hazard reduction is highly controversial, scientifically unsubstantiated, and fundamentally experimental in nature. Unfortunately, it appears that mechanical thinning is becoming yet another euphemism for industrial-scale commercial logging—one of the prime management activities that degrade ecosystems and cause forest health/fire hazard problems.

In some instances, it has been demonstrated that commercial thinning treatments intended to reduce fire hazard have actually had the opposite effect. Although gross tonnage of fuels may have been reduced, there has been a net increase in hazardous fine fuels accumulating on the surface and available for burning—primarily logging debris or “slash.” Also, changes in microclimate from tree removal serves to increase solar radiation and wind penetration, which in turn increases site flammability following thinning treatments. (Organization, Eugene, OR - #A21798.30500)

### **1493. Public Concern: The Forest Service should prohibit timber removal.**

#### **BECAUSE TIMBER REMOVAL INCREASES FIRE SEVERITY**

Opponents will also claim that the roadless policy will impede the ability to control wildfires. The catastrophic and unnatural wildfires in the western states this past year were due primarily to a bad drought, past wildfire suppression activities, and past timber and grazing practices. Many scientific assessments have [blamed] commercial logging [for] an increase in wildfire intensity and severity. In a report to Congress, the Sierra Nevada Ecosystems Project stated, “timber harvesting through its effects on forest structure, local microclimate, and fuels accumulation has increased fire severity more than any other recent human activity”. The ecosystems of the roadless areas are more resistant to catastrophic and unnatural wildfires than the intensely managed and altered ecosystems of roaded areas. (Individual, Pittsburgh, PA - #A5752.30430)

The new scam about needing roads and logging to protect the world from forest fires is simply another deception cleverly contrived by Forest Service policy makers. It’s obviously designed to justify logging and road-building where it should not be, just as the pine beetle and other insects have been your blank check for massive mayhem over the past 3 decades.

Once again, let me be clear: logging is logging. It’s not fire prevention. **STAY OUT OF ALL ROADLESS AREAS, PERIOD.** In fact, many existing roads should be obliterated, allowing increases in the size of appropriate and justifiable roadless areas. That would be fair. (Individual, Libby, MT - #A8346.30100)

Conservation and taxpayer groups have urged the Forest Service and policy makers to adopt the following recommendations: . . . Prohibit the use of commercial timber sales for hazardous fuels reduction projects. Commercial logging removes the most ecologically valuable, fire-resistant trees, yet leaves behind highly flammable small trees, brush, and logging debris. The financial incentives for abusive logging under the guise of “thinning” must be eliminated; (Organization, Portland, OR - #A12004.30400)

#### **PROHIBIT COMMERCIAL TIMBER REMOVAL**

Prohibit the use of commercial timber sales for hazardous fuels reduction projects. Commercial logging removes the most ecologically valuable, fire-resistant trees, yet leaves behind highly flammable small trees, brush, and logging debris. The financial incentives for abusive logging under the guise of “thinning” must be eliminated. (Organization, Santa Fe, NM - #A22092.30520)

**1494. Public Concern: The Forest Service should prohibit even age management.**

Lower canopy fires are necessary for a productive forest: hazardous fuels do need to be dealt with in a responsible manner, this means no clearcutting or cutting resembling clearcutting in any way. (Individual, Akron, OH - #A17697.30100)

**BECAUSE IT INCREASES WILDFIRE RISK**

The primary argument against protection of roadless areas is threat of wildfire, and hence the need for logging to reduce wildfire risk. However, it's important to dissect this argument. First, clearcutting greatly enhances wildfire risk. Clearcutting removes the largest and most fire resistant trees, increases wind and solar radiation by removal of canopy, disturbs soil moisture holding capacity, leaves highly flammable layers of slash on sun-baked forest floors, disturbs the genetic, age, and species structure of the forest, and guarantees a monoculture future of young, dense, skinny trees. So clearcutting is obviously out, and we must be talking exclusively about thinning. (Individual, Pullman, WA - #A6234.30400)

First, no massive clearcuts. Such destructive logging practices make forests especially vulnerable to wildfires (clearcuts burn very hot) and disease by upsetting what had been a dynamic, healthy, balanced ecosystem. Do not let timber corporations do the job of forest "management", because environmentally-destructive, industrial-strength logging. (Individual, Bozeman, MT - #A27944.30100)

**BECAUSE THE BROKEN MOSAIC BOUNDARIES OF CLEAR CUTS INCREASE THE MORTALITY OF BENEFICIAL SPECIES AND ALLOW INSECT ENCROACHMENT ON SURROUNDING AREAS**

Broken mosaic boundaries of logging clearcuts increases mortality of all beneficial species and allows insect infestation to encroach on the surrounding forested boundaries. (Individual, Nampa, ID - #A5378.31200)

**1495. Public Concern: The Forest Service should prohibit salvage removal.**

As far as authorizing "emergency" salvage sales to control insect and disease outbreaks, or for storm damage, I am totally opposed to these actions! (Individual, Clemson, SC - #A26858.30100)

Nor should there be logging by any method to fight fires or to detect or prevent insect or disease outbreaks. Nor should there be salvage logging after a fire; salvage logging exacerbates the damage done by a fire. (Individual, Salem, OR - #A13948.30100)

The practice of salvage logging is highly controversial and cannot be scientifically justified. "The value of salvage sales as ecology therapy is extremely questionable. By removing most of the coarse organic debris from the site, salvage sales actually abort natural healing processes, instead of aiding them." (Jeffrey St. Clair 1991) IN 1976 Congress created a revolving fund for salvage sales as part of the National Forest Management Act. The Forest Service can funnel all of the receipts from salvage sales back into the salvage sale fund where it can be used to design and build roads, and prepare and administer new salvage sales. Of course the agency is also permitted to keep a large slice for overhead, often totaling nearly 50 percent of the sale's bid value. Since the Forest Service can keep 100 percent of the receipts of salvage sales, almost all sales are by definition below-cost." (Jeffrey St. Clair) "Salvage sales often cost more than the revenues they can generate, because the sales are net cash generators, because one hundred percent of the receipts are deposited in the fund for preparing and administering future salvage sales," (Congressional Research Service, 1994) "Management activities that reinforce negative effects or undermine positive effects of fires must be avoided if streams are to recover. In particular management activities that add to the risk of increased sedimentation or that remove ecologically important large wood from the watershed present a substantial and long-term threat to the recovery of streams. In this regard, logging and roadbuilding represent one of the most significant forces threatening to retard streams and watershed recovery." (Letter from five ecology professors to President Clinton on post-fire salvage logging). "The extent of a forest fire depends more upon the moisture content of live and dead fuel at the moment of ignition than it does on the amount of fuel accumulating on the forest floor. Wind speed also plays a critical role. In fact, three of the biggest fires of 1994, Tyee,

Boise River and Blackwell, burned hottest and fastest in previously logged areas.” (Ron Mitchell, Idaho Sporting Congress, 1995) (Individual, Roanoke, VA - #A23081.30100)

Fire is also an integral part of the forest ecosystem; it is the Forest Service’s long-term policy of fire suppression has resulted in forests with uncharacteristic fire potential. Fires in roadless areas must be allowed to burn to prevent catastrophic fires in the future. While portrayed as a means of preventing fire, logging an area actually increases the likelihood of higher intensity fire in that area. Logging cannot mimic fire because it is a fundamentally different process than fire. In addition, in terms of ecological destruction, logging has more severe and long-lasting deleterious effects on soils than fire; this in turn leads to adverse impacts on aquatic habitat and the forest ecosystem as a whole. This is particularly true of “salvage logging” on previously burned areas. Logging and road construction in roadless areas will not prevent these and other areas from burning, but it will certainly eliminate roadless areas as anchors and refugia for fish and wildlife. Similarly, salvage logging will not prevent additional future fire and only exacerbates the impacts from fire, impeding the forest’s ability to heal. Salvage logging or any post fire fuel reduction should not be allowed should a fire occur in a roadless area. (Executive Director, Inter-Tribal Fish Commission, Portland, OR - #A20331.30300)

The Bitterroot National Forest has recently claimed that their risky and unproven post-fire salvage logging proposal in burned areas there will reduce the risk of future wildfires - while at the same time the Forest Service talks about the need to restore fire into these fire-dependant forests. Numerous scientific studies have found that post-fire salvage logging hinders a forest’s natural recovery process and has no ecological benefits. For example, a recent scientific report, “Wildfire and Salvage Logging,” states that while “there is little reason to believe that post-fire salvage logging has any positive ecological benefits? there is considerable evidence that persistent, significant adverse environmental impacts are likely to result from salvage logging.”

Furthermore, science does not support the Forest Service’s claim that post-fire logging will reduce the possibility of a reburn. A 2000 Forest Service report found “no studies documenting a reduction in fire intensity in a stand that had previously burned and then been logged.” (Individual, Staunton, VA - #A30027.31100)

## **1496. Public Concern: The Forest Service should prohibit thinning.**

### **IN MOIST OR HIGH ELEVATION FIR, HEMLOCK, SPRUCE, AND CEDAR FORESTS**

Now, thinning is needed to counteract nearly a century of fire suppression conducted by the Forest Service. However, 100 years without fire is well within the natural range of variability for moist or high elevation fir, hemlock, spruce, and cedar forests. These moister forests are actually adapted to high intensity fires. Due to their high moisture levels, these forests only burn during seasons of great drought, which of course produce catastrophic wildfires. Thus, Forest Service fire suppression over the past several decades has likely had little impact on these moist forests so thinning is not necessary. (Individual, Pullman, WA - #A6234.30530)

### **BECAUSE THINNING TO REDUCE OVERGROWN FORESTS IS COST PROHIBITIVE**

The subject of “Forest Health” can fill volumes. Most thoughtful people who have taken the time to ascertain the condition of the forests in the Southwest Region conclude that the forest is generally overgrown, prone to cataclysmic fire events, and unhealthy. The trees in the LNF are especially stressed due to the overgrown condition. Excessive mortality of trees due to bark beetle attacks and mistletoe incidence are the rule rather than the exception. The question then arises as to what to do to improve the health of the forest?

Thinning is cost prohibitive. Estimated costs often exceed \$1000 per acre. (Individual, Ruidoso, NM - #A17775.30100)

### **BECAUSE SILVICULTURAL ACTIVITIES DO MORE HARM THAN GOOD**

Silvicultural activities will do more harm than good and are an excuse to high-grade these forests, making them more fire prone. Removing brush and small diameter trees is a money-losing proposition

and will create a higher fuel load in slash and brush re-growth from increased sunlight. The fire integrity of the forests will decrease even further if high-grading is done to pay for the removal of the low-grade, high fuel load materials. This integrity will be further compromised by the continuing maintenance costs once silvicultural activities are started and the fact that ten to twenty or so years from now when future maintenance is required there will be even fewer trees and even more brush and dog-hair, an even higher cost proposition to deal with. Just as with the \$10B road maintenance backlog, a similar and larger backlog will develop in maintaining these forests in a “low-fuel-load state”. This whole situation is a tar baby that once started will be rued and paid for by future generations. (Individual, Corvallis, OR - #A8027.30100)

#### **BECAUSE ROADLESS AREAS SHOULD NOT BE DISTURBED**

As the original rule stands, roadbuilding for fire control and forest health is allowed, which is reasonable in case of emergencies. However, the best management of roadless areas, in response to question three, is to leave them roadless and not disturb them, even for seemingly good things such as “forest thinning” for “fuel reduction” or insect control. (Individual, Bethesda, MD - #A16909.30100)

## **Fire Management**

### **Summary**

**General Comments** – A number of people comment on the topic of fire management and believe that it should be addressed in a national roadless rule. Several respondents urge the Forest Service to address fire management relative to the national fire plan, the interagency fire policy, and the federal/state strategy. One individual suggests that the Forest Service review the recommendations of the General Accounting Office on reducing wildfire threats and take immediate action. Additionally, one association requests the Forest Service consider that national grasslands are also at risk of fire.

Others suggest the Forest Service implement various fire policies such as the 1995 Wildland fire policy, the national fire strategy, and the national fire plan. Several respondents add that the Forest Service should change traditional Smokey the Bear fire suppression policies. Others request that the Forest Service work with other public land management agencies—including the National Park Service and the Bureau of Land Management—to set sound, consistent policies for fire management.

**Adequacy of Analysis** – Respondents comment about the analysis of fuel management, and the impacts and risks of wildfire. People ask the Forest Service specifically to consider that roadless areas do not have a higher risk of wildfire; that there is no causal link between uncontrolled wildfires and the presence or absence of roads; that the majority of roadless areas are not situated in areas of high fire risk; and that fire frequency increases as road density increases. One individual asserts that the Forest Service should conduct more studies about how to control fires, including controlled burns. Others ask the Forest Service to consider various contributing factors to fire severity and intensity such as human activity, wind, weather, slash piles, and tree species.

One individual requests that firefighting practices be evaluated. Others request that the Forest Service analyze the appropriateness and need for prescribed fire, the effectiveness of restoration projects, and the need for effective vegetation management on the national grasslands. Additionally, people ask the Forest Service to evaluate the impacts of no management versus the impacts of roading or other management activities; to conduct ecological assessments for all fuel reduction projects; and to categorize inventoried roadless areas in accordance with fire regime, condition class, vegetation, and risk of disease.

**Funding** – Several respondents believe the Forest Service should reevaluate the costs and funding associated with fire management. Suggested costs and funding to be analyzed include fire suppression costs, controlled burning funds, and firefighting funds. A few people assert that tax dollars should not be used to fund firefighters and their equipment that are brought in from distant places rather than the local area, or for fire suppression and timber removal in remote areas located far from residents. One business remarks that the Forest Service contract with an independent organization to analyze expenses associated with fire management if roads are destroyed. At the same time, an individual suggests the Forest Service provide funding to conduct controlled burns and non-commercial thinning, and ensure that emergency funds are spent in areas where wildfire truly threatens communities. Finally, one individual recommends that the Forest Service take legal action against organizations which have blocked fuel load removal in order to recover costs for fires that have resulted from such lack of action.

**Education** – Several people suggest that the Forest Service educate the public about fire safety; about the reasons for controlled burning; about the role of fire and disturbance in forests; and about what is needed to support firefighting efforts.

**Management** – A number of respondents assert that the Forest Service should actively manage forest resources to prevent fires and reduce fire hazards. To that end, people suggest a number of fire management strategies, including monitoring and grazing. One county commissioner suggests that the Forest Service should control fire size and frequency on public lands to approximately that of pre-settlement conditions by reducing fuel loads. Reducing fuel loads, numerous people suggest, can be accomplished through prescribed and controlled burning—in areas outside of wilderness or roadless areas, in forests which border communities, in late fall, every four to five years, or at low-risk times of the year. Some recommend carrying out prescribed burns only after preventative steps to reduce fuel loads are taken, such as harvesting, thinning, and grazing; and using techniques that adhere to local fire management plans and that contain monitoring provisions to assess the usefulness of the burns.

Others request that the Forest Service construct firebreaks—by using roads as firebreaks; by decommissioning some roads and managing the remaining as a defensible perimeter against wildland fire; by clearing dead timber and thinning stands next to private property to an appropriate width; by creating a boundary around roadless areas with multiple use, motorized trails; or by maintaining fire lanes but closing them to all but foot traffic. One special use permit holder suggests allowing ski areas located on the fringes of roadless areas to help provide defense zones which allow for development while decreasing fuel loads. Others recommend maintaining existing fire trails.

Some people also assert that the Forest Service should suppress forest fires. One individual states, “Protecting forests is something you know nothing about, or the let burn policy in Yellowstone would never have been followed. First put fires out as soon as possible before they get out of control.” Suggestions for suppressing forest fires include using chemicals, allowing fires to burn to a certain landscape feature before suppressing them, and enlisting military aircraft converted into water tankers. Some say the Forest Service should concentrate firefighting efforts in urban interface areas because these areas are already roaded and pose the greatest threat to life and personal property (see also the subsequent main section on protecting communities). Finally, some recommend that the Forest Service specify the criteria under which the Roadless Area Conservation Rule exceptions would apply for management activities needed to reduce the threat of wildfire.

Others assert that the Forest Service should acknowledge that wildfire is a component of a healthy forest. These people state that fires should not be suppressed—because natural fire maintains diverse forests and wildlife habitat; because fire rejuvenates ecosystems; because firefighting is a waste of money, dangerous, and harms the environment; and because dead timber is a critical part of the forest ecosystem. These respondents say that fires should only be suppressed under certain conditions—in the event of insect or disease infestation that is uncontrollable by natural means, or in the event the fire is human-induced.

Others believe that fire should be reintroduced into forest ecosystems. According to one organization, “The most effective fuels treatment that would both protect roadless areas from future severe fires [and] insect and disease outbreaks while at the same time [restore] areas altered by past fire exclusion would be a program of prescribed burning and wildland fire use. Fire reintroduction has been the longstanding call among scientists, ecologists, and conservationists. It is the most ecologically beneficial and least economically costly management treatment to manage roadless areas.” A few people request that the Forest Service avoid artificial fires, backburning, and prescribed burning. Finally, one individual urges the Forest Service to allow a categorical exemption for restoring burned areas, including needed road building, salvage logging, soil preparation, seeding, planting, riparian restoration, and follow-up work to help the survival of seedlings.

## *Fire Management General*

### **1497. Public Concern: The Forest Service should address fire management.**

#### **BECAUSE FIRE IMPACTS REGIONS DIFFERENTLY**

The effect of fire on the inventoried roadless areas as stated on page 3-41 of the DEIS, overlooked the fire patterns in the various physiographic regions. As a result of this variation, forest fires disproportionately impact the intermountain and eastern Oregon lands more than other areas. In eastern Oregon these fires have had catastrophic environmental impact on the roadless areas. Any roadless policy needs to address fire management. (Elected Official, Roseburg, OR - #A17667.30400)

### **1498. Public Concern: The Forest Service should address fire management in a national roadless rule.**

#### **RELATIVE TO THE NATIONAL FIRE PROGRAM**

The DEIS (3-12) also noted that under the proposed action an increase in fire suppression costs will occur as a result of increase in fire size and frequency. With the history of major catastrophic fires in eastern Oregon associated with roadless, natural areas, and the Wilderness areas, it is our position that the proposed roadless management strategy is not well advised. If it is adopted, then we strongly recommend that clear direction be incorporated relative to fire response activities and the national fire program. (Elected Official, Roseburg, OR - #A11811.30410)

#### **RELATIVE TO THE FEDERAL INTERAGENCY WILDLAND FIRE POLICY, THE NATIONAL FIRE PLAN, AND THE 10-YEAR FEDERAL/STATE STRATEGY TO ADDRESS FOREST ECOSYSTEM HEALTH**

This is a question that should be answered through planning at the forest level, but with some guiding principles at the national level. These guiding principles can easily be gleaned from the federal interagency wildland fire policy, the National Fire Plan, and the 10-year federal/state strategy to address forest ecosystem health in the West. Human intervention to minimize wildfire risk should be prioritized at the urban/wildland interface, but not at the expense of ignoring threats to private property from wildfires in roadless areas. Considering fuel buffers between roadless areas and private property is appropriate, but such strategies should be developed at the local level. (Association, Washington, DC - #A17887.30100)

Regarding protection from the buildup of hazardous fuels and severe wildfires, the Forest Service should continue to implement the National Fire Plan (NFP) and periodically evaluate and adjust the plan. The NFP contains a comprehensive 10-year strategy that includes fire fighting, rehabilitation and restoration, hazardous fuels reduction, community assistance, research, and accountability. The Forest Service has made addressing wildland fire in the urban-wildland interface a priority and this should continue. (Federal Agency, Washington, DC - #A28843.30410)

#### **BECAUSE THE EFFECT OF FIRE VARIES BY AREA**

The effect of fire on the inventoried roadless areas as stated on page 3-41 of the DEIS, overlooked the fire patterns in the various physiographic regions. As a result of this variation, forest fires disproportionately impact the intermountain and eastern Oregon lands more than other areas. In eastern Oregon these fires have had catastrophic environmental impact on the roadless areas. Any roadless policy needs to address fire management. (Elected Official, Roseburg, OR - #A11811.30400)

Management of healthy forests can occur without roads -- by definition that has historically been the case in the proposed areas. Fire management is complex and very situation dependent. Making a blanket statement on how to protect resource values and homes from wildfire is not possible. Clearly, local managers will need to retain some ability to make decisions based on resource values, knowledge of current fire ecology, location of private property, fire crew and public safety, weather, and a host of other factors, but this flexibility is included in the proposed initiative. (Individual, Seattle, WA - #A17843.30100)

#### **1499. Public Concern: The Forest Service should review the recommendations of the General Accounting Office on reducing wildfire threats and take immediate action.**

I believe that the recommendations of the GAO [general accounting office] on Reducing Wildfire Threats should be reviewed and actions immediately taken in the interest of protecting lands. Fire suppression has not worked and has backfired with devastating consequences. Taxpayers for Common Sense also published From the Ashes noting that untouched forests have the greatest resiliency and harvests promote fires. (Individual, Olympia, WA - #A20844.30400)

#### **1500. Public Concern: The Forest Service should consider that national grasslands are also at risk for fire danger.**

##### **BECAUSE FIRES THREATEN HOMES, RANGE IMPROVEMENTS, OIL AND GAS STRUCTURES, VEGETATION AND WILDLIFE HABITAT, AND OUTLYING FARM AND RANCH STRUCTURES**

The agency myopia regarding fire on the National Grasslands is also confirmed in the Roadless Administrative Record. There the Forest Service rates the National Grasslands as low for fire risk, although more than 60,000 acres burned in less than two days. The fire damage risk is greater in North Dakota, because there are many homes, range improvements, and oil and gas structures also located on the National Grasslands. A fire will not just burn vegetation and wildlife habitat, but could ignite oil pipelines, burn homes and outlying farm and ranch structures, and range improvements. (Organization, Denver, CO - #A21358.30400)

#### **1501. Public Concern: The Forest Service should prohibit fires in dry areas.**

Local forester input would be very useful on this subject, prohibitions should be established that would best protect depending on the potential risk of damage to a particular area, i.e. no fishing in endangered species areas, fire bans in dry areas, no bikes in erosion prone areas, etc. (Individual, No Address - #A8998.90000)

##### **BAN OUTDOOR BURNING WHEN THERE IS A LACK OF MOISTURE**

We think outdoor burning, such as county fire bans, should be enforced earlier when there is lack of moisture. (Individual, Bayfield, CO - #A13395.30400)

**1502. Public Concern: The Forest Service should consider that the Roadless Area Conservation Rule will not likely result in an increase of wildfires in California.****IN ADDITION, CONTINUED IMPLEMENTATION OF THE NATIONAL FIRE PLAN AND THE CALIFORNIA FIRE PLAN WILL INCREASE PROTECTION OF FORESTS AND COMMUNITIES**

Protecting forests and communities—CDF knows these two goals as interconnected. The Rule as adopted on January 12, 2001 provides adequate authority for CDF and the USFS to take the steps necessary to protect forests, communities, and public safety from wildfire and other natural disasters. CDF is pleased that the Rule responded to our concerns in this area, especially by creating flexibility for the Forest Service to construct new fire roads and reduce fuels with tree removal and other means when needed (see Section 294.12(b)(1) and Section 294.13(b)(1)(ii)).

CDF's experience has shown that more than 90% of wildfires are caused from human ignitions. Therefore, the Rule will not likely result in an increase of wildfires in California. In addition, continued implementation of the National Fire Plan, in conjunction with the California Fire Plan, will increase protection of both forests and communities, especially those in the urban-wild land interface. (State Agency, Sacramento, CA - #A18110.30400)

***Fire Management General – Management Strategies*****1503. Public Concern: The Forest Service should implement various fire policies and plans.****IMPLEMENT THE 1995 WILDLANDS FIRE POLICY**

Issue #A1, The 1995 Wildlands Fire Policy is being Ignored. I repeatedly read about and have seen in the field first hand, our non-function natural processes that have resulted from aggressive wildfire suppression efforts over the last 40 years. I am reminded of this issue by the tragic accident that occurred on the Thirtymile Fire. In our area of the Northern Rockies, we are located in a fire adapted ecosystem where fire performs beneficial ecological functions. In spite of this, we aggressively suppress all fires, in all places, under all conditions.

We spend billions of dollars and put people in harms way each year for what reason? What are we trying to protect? There are a few times when we should proceed with initial attack on a fire start. There are many, many more times when we should allow fire to assume its natural role and monitor its behavior. In spite of the 1995 Federal Wildlands Fire Policy, such an evaluation and fire planning prior to initial attack is never occurring. I am certainly not advocating a 'let burn' policy, but true proactive fire management.

Any ecologist can clearly show why all wildland fire is not bad. Certainly we do not wish to see public inhaling structures damaged by fire. We know there are very effective ways to treat nearby such structures in the defensible zone to reduce risk.

The fire organization has evolved over the years to take on a culture of their own. Many do not work well with or listen to other resource specialist's needs. You ask a fire manager if it was a bad fire year, and their reaction might be 'yes it was bad, there were no big project fires.' Too much emphasis is placed on the fire excitement and overtime, and not enough on what is best for the firefighter's safety, or the resource needs.

I know this is a very sensitive issue. The recent tragic deaths of four young firefighters in Washington State is terrible. As you know, much has been written in the media about firefighter experience and tactics related to this incident. The media is playing the blame game.

I read all the related articles hoping to find the real questions asked and answered. Only now, have these questions been asked. It is unfortunate that the questions (see the Portland, Oregonian article enclosed) were asked by Andy Stahl representing FSEEE. It is too bad these questions were not asked by the USFS. For what reason were these firefighters in that location and what were they attempting to protect? What in the area was so valuable as to justify risking human lives to protect it?

National direction is desperately needed now!! (Individual, Grangeville, ID - #A1578.30410)

### IMPLEMENT THE NATIONAL FIRE STRATEGY

The Forest Service under the Bush Administration should maintain the roadless rule as written. Hopefully this administration will focus its attention upon implementing the National Fire Strategy and protecting human communities in the urban/wildland intermix in the American West. Reducing forest fuels and restoring forested landscapes for future generations is critically important to the American people and to the credibility of the Forest Service. It is not the time to be fighting over logging roadless land such as the Tongass or in California but a time to work collaboratively on solving the wildfire risks to our national forests and communities. We urge you to support the Roadless Area Conservation Rule and protect these pristine areas as roadless. (Organization, Placerville, CA - #A22653.10150)

### IMPLEMENT THE NATIONAL FIRE PLAN

Full implementation of the National Fire Plan must be the land management direction for the next ten years on national forests. Until the hazardous fuel conditions are adequately corrected through various fuel reduction or forest restoration projects, no further restrictions should be imposed on management practices or access to any national forest lands. Every effort must be made to work with communities and adjoining property owners to resolve the hazardous fuel problem in the shortest and most efficient time period possible. (Professional Society, Chico, CA - #A29719.30410)

Only through the implementation of a National Fire Plan through cooperative efforts like the County Fire Safe Councils, will hazardous fuel get reduced across the total landscape and watershed of the west. (Professional Society, Chico, CA - #A29719.30410)

Building upon these thoughts, the success of the National Fire Plan provides an exemplary framework for roadless area value management to be based upon. There is not another issue that exemplifies this "working together" ethic that is vital and necessary for development of a successful roadless policy. Most recently the Ten-Year Strategy on how to address catastrophic wildfire threats across the country was signed by two cabinet secretaries and leading western governors. The CWSF [Council of Western State Foresters] feels that the Forest Service should seriously consider collaborating with stakeholders at local, state and national levels according to the process developed and recommended within the Ten-Year Strategy. (Professional Society, No Address - #A29920.30410)

## **1504. Public Concern: The Forest Service should change traditional Smokey the Bear fire suppression policies.**

### TO SOLVE WILDFIRE PROBLEMS

The Roadless Rule is based on scientific information that roadless areas are in fact the most resistant to severe wildfires, insects and diseases. Changing the Forest's traditional Smokey-the-Bear fire suppression policies will do more to solve severe wildfire problems than any other option. (Individual, Reno, NV - #A5741.30100)

The reason that we have fuel loading problems today is that we have been suppressing fires for a century, allowing unnatural fuel buildups to occur. This has led to a dramatic increase in large and intense wildfires throughout the nation, a fact that has been well documented in a series of Congressional Research Service reports. There is a saying in Wyoming: when you find yourself in a hole, stop digging! A hundred years of Smokey the Bear got us into this mess; no amount of fire suppression will ever get us out. Instead, we need to implement a nationwide let-burn policy in all of our roadless areas, to allow natural cycles of small, low-intensity fires to return on our forests. (Individual, Laramie, WY - #A10590.30310)

Forests are dynamic entities not static objects, hence they can be managed by never preserved. Overcoming the impact of 100 years of Smokey Bear fire control is not only desirable, but also necessary. VERY careful and limited controlled burning has a place and so does road building and logging. Stands to remain unlogged must be placed in a condition where natural ignition can be permitted without undue

risk of catastrophic wildfire . . . No one said it would be easy. (Individual, Ellensburg, WA - #A17772.30100)

Much of the controversy surrounding management of national forest resulted from aggressive clear-cutting practices, the road building associated with those activities and Smokey the Bear fire policy that has promoted a fuel buildup that can lead to catastrophic fire. The Idaho Outfitters and Guides Association strongly recommends reconsideration of those practices and that they not be executed in remaining roadless areas unless essential for forest health. Where large tracts of trees have been destroyed by disease or weather, the agency should have flexibility to reduce fuel loads, if necessary, in these areas if the prevailing conditions present a significant threat to the ecosystem and/or surrounding communities. (Permit Holder, Boise, ID - #A29589.30100)

Inventoried roadless should be managed to protect its roadless characteristics, which includes keeping motorized vehicles and pioneered roads out. Whether or not unroaded areas are inventoried, severe forest fires happen. They happen in roaded areas too. The build-up of hazardous fuels can be addressed by changing the failed fire suppression policies. Prescribed fire, though very limited in practical use, is a desirable option. We have fire management policies in wilderness that when applied, work quite well. We have inventory and control programs for insects and disease in wilderness. Use those same policies in inventoried roadless. (Organization, Helena, MT - #A20598.30100)

**1505. Public Concern: The Forest Service should specify, to the extent possible, the roadless areas in which fire reduction management exceptions would apply.**

**IN THE FOREST PLAN REVISION PROCESS**

The current roadless area conservation rule allows for management activities to reduce threats from wildfires.

We suggest that it is the role of Forest Plan revision to specify-to the extent possible-in which roadless areas this exception would apply and the thresholds that would trigger these management activities. It would be expected that these thresholds would be different for various land units identified within GIS analyses. (Civic Group, Roanoke, VA - #A1713.30400)

Regarding the management of inventoried roadless areas to provide for the detection and prevention of insect and disease outbreaks, the Forest Service should make clear that insects and diseases are part of a healthy forest. We note the exceptions of exotic and non-native species such as the gypsy moth and believe that provisions can be made for the well-justified control of these invaders. There are also periodic epidemics of native insect and diseases that may warrant control measures. The efficacy of various pest and disease control methods should be established through research, reviewed for environmental impacts, and implemented using integrated pest management protocols on a case-by-case basis, with periodic review and evaluation. The role of insects and diseases in a natural forest ecosystem should include an assessment conducted in the early stages of plan revision or included as part of the Analysis of Management Situation of a revised plan.

The current roadless area conservation rule allows for management of insect and diseases under certain conditions. We recommend that it is the role of the Rule to determine the minimum standards which would be applied, and the role of the forest plan revision to specify, to the extent possible, in which roadless areas these exceptions would apply and the thresholds that would trigger these management activities. (Individual, Asheville, NC - #A22623.31200)

Carefully define specific national criteria for consideration of any exception in the designated areas for how management requiring roads can occur for fire, wildlife, fish, forest health, and any other legitimate need. (Individual, Galloway, OH - #A8213.30200)

**1506. Public Concern: The Forest Service should work with all federal agencies, including the National Park Service and the Bureau of Land Management, to set sound and consistent policies for fire management.**

**IN NATIONAL PARKS, WILDERNESS AREAS, AND ROADLESS AREAS**

A complaint of logging industries is that leaving tracts of land roadless leads to the possibility of destructive wildfires. However, fire is a natural element that ensures the health of forest ecosystems. Exceptions include situations where fire puts pressure on endangered species that are already under great stress from man's activities. All Federal agencies including the National Park Service, the BLM, and the USDA Forest Service should work together to set sound and consistent policies for fire management in National Parks, Wilderness Areas, and the Roadless Areas of the National Forests. One important start is to inventory the plants and animals in the forest and the pressures on their survival. (Individual, State College, PA - #A15450.30400)

**1507. Public Concern: The Forest Service should employ the same forest management strategies in roadless areas that are used to protect communities and private property from fires beginning on other lands.**

**BECAUSE FOREST FIRES OFTEN BEGIN ON DEVELOPED PRIVATE LANDS**

If there is a correlation between the initiation of forest fires and the degree of roadlessness, the Forest Service should bring this information forward. I have seen no study that would support the contention that wildfires are more or less likely to be initiated on roadless versus public lands. In the area of the Gallatin National Forest, at least two of the dozen or so fires of the past two seasons have started on developed private lands. I would argue, therefore, that the same strategy that is employed to protect communities and private property from fires beginning on other types of land should be employed. (Individual, Bozeman, MT - #A17508.30430)

*Adequacy of Analysis*

**1508. Public Concern: The Forest Service should evaluate wildfire risks.**

**CONSIDER THAT ROADLESS AREAS DO NOT HAVE A HIGHER RISK OF WILDFIRE**

One of the most common arguments that have been raised by roadless area protection opponents is the fact that there will be increased wildfires if there are no more roads or logging in these areas. In the following paragraphs I have included some research that proves the fact that roadless areas do not have a higher risk of wildfire.

Throughout the Northern Rockies, many logging activities are justified as a means of controlling potential future wildfires, as a means to reduce build-up. Wildfire is controlled by other factors other than just fuels build-up or vegetational age. In fact, weather and climate are the most important factors.

Logging generally removes the larger trees, leaving the small fine fuels, which are very good at carrying a fire. Logging simply changes the intensity of fire in a stand of trees, not its spread from stand to stand. Logging does little to stop fire spread, rather it just changes the intensity.

A Forest Service report, "Forest Resources of the United States" (1994), revealed that tree mortality in the West due to both fire and disease increases in logged areas. The worst rate were on private lands where logging levels are highest and where the least natural forest remains. For example, in western forests from 1986-1991, mortality due to fire and disease on private lands increased 20 percent, while it increased only 3 percent on National Forests and decreased 9 percent on other public lands.

"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.” (Evaluation of EIS alternatives by the Science of Integration Team, ICBEMP, page I-281)

“Logging areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes. As a by-product of clearcutting, thinning, and other tree-removal activities, activity fuel creates both short- and long-term hazards to ecosystem. Even though these hazards diminish over time, their influence on fire behavior can linger for up to 30 years in dry forest ecosystems of eastern Oregon and Washington.” (Huff, M.H., R.D. Ottmar, E. Alvarado, R.E. Vihaneck, J.F. Lehmkuhl, P.F. Hessburg, and R.L. Everett. 1995. Historical and current landscapes in eastern Oregon and Washington. USDA Forest Service Pacific Northwest Research Station Gen. Tech. Rep. PNW-GTR-355.) (Organization, Bozeman, MT - #A15467.30511)

The existing Roadless Rule presently accounts for protection of public and private lands from severe wildfire and insect and disease outbreaks. This is accomplished through the Rule’s exception which provides that “a road may be constructed or reconstructed in an inventoried roadless area if . . . [a] road is needed to protect public health and safety in cases of an imminent flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property.”[Footnote 9]

Despite the Roadless Rules above-cited exception, I know that many opponents of the Rule nonetheless claim with great vehemence that the Rule will greatly reduce the Forest Service’s ability to undertake fuel management and will therefore result in many terrible wildland fires on national forest land. This position, however, ignores much of the analysis contained within the Final Environmental Impact Statement. **In fact, according to the FEIS, the roadless rule will have no effect on the frequency and intensity of catastrophic fires on inventoried roadless areas.** [Footnote 10]

A necessary starting point to any discussion on how the Roadless Rule might impact fuel treatments in inventoried roadless areas in the Forest Service’s acknowledgement in the FEIS that “in inventoried roadless areas, very little fire hazard reduction work has occurred in the past and little work is planned for the future.”[Footnote 11] This is because:

Regardless of whether there is a prohibition on timber harvest in inventoried roadless areas, the highest priorities for fuel management work will continue to be on NFS lands outside of roadless areas where natural resource values or potential threats to human communities are the highest. [Footnote 12]

In fact, because of the much higher prioritization established for the treatment of National Forest Service lands that are roaded, the FEIS assumes that, across all for the Rule’s considered alternatives, including the “no action” alternative, “fire hazard reduction work would not begin in inventoried roadless areas for at least 20 years, the estimated time it would take to address the extremely hazardous fuel situations that exist outside roadless areas.”[Footnote 13] This 20-year forecast for the initiation of any wide-scale fuel management activities in inventoried roadless areas, however, may overstate how soon such projects may actually begin. As the FEIS further explains, “Some agency personnel think the 20-year timeframe is overly optimistic, and that it would take a much longer period to correct the hazardous fuel situations in roaded landscapes.”[Footnote 14]

An analysis of the fire risk faced by the Roadless Rule’s inventoried roadless areas is further illuminating. Within inventoried roadless areas, 19 million acres face a low risk of wildland fire, 14 million acres face a moderate risk of fire, and 8 million acres face a high risk. [Footnote 15] It is critical to note, however, that these risks rankings do not describe the probability of a fire occurring. Rather, the classification scheme refers to “the potential harmful effects to key ecosystem components and human communities . . . that can occur once a wildland fire ignites and burns.”[Footnote 16]

Understanding this nuance of the risk characterization scheme is key because it indicates that extensive roadbuilding in “high risk” forests to promote mechanical forest treatment is actually counterproductive; roadbuilding should be banned from such fire-sensitive areas because “[a] **human-caused wildfire is nearly five times more likely to occur on essentially roaded lands than on essentially unroaded lands.**” [Footnote 17]

**This point cannot be emphasized enough: fires are actually more likely to occur in roaded areas than in unroaded areas, meaning that a concern for reducing catastrophic wildland fire actually weighs in favor of the existing roadless rule.**

Further, in instances where mechanical treatment is necessary to reduce unnatural fuel buildups, the Roadless Rule still provides “a full array of fuel treatment options,”[Footnote 18] the implementation of which is expected to produce no change in the number of large wildland fires or acres burned when compared with the status quo. [Footnote 19] (Individual, No Address - #A5948.30400)

**CONSIDER THAT THERE IS NO CAUSAL LINK BETWEEN UNCONTROLLED WILDFIRES AND THE PRESENCE OR ABSENCE OF ROADS**

As study after study has proven, there is no causal link between uncontrolled wildfires and the presence or absence of roads. Scenic America believes that maintaining existing roadless areas under the rules and regulations set forth in NFMA will protect forest health. (Organization, Washington, DC - #A22098.30100)

**CONSIDER THAT THE MAJORITY OF ROADLESS AREAS ARE NOT SITUATED IN AREAS OF HIGH FIRE RISK**

Speaking specifically to roadless lands in California and the Sierra Nevada, the majority of the lands proposed for protection are not situated in areas of high fire risk. Most of the areas in the Sierra Nevada are in high elevation areas with low fire return rates and relatively high moisture content vegetation. Only a very small percentage of the roadless lands carried under the January 12th rule are in high fire risk areas. In the limited amount of roadless area acres where severe fire risk is an issue, the January 12th rule provides for exemptions, road-building and logging when needed to address concerns regarding wildfire and forest health and imminent threats to public health and safety. There is local area discretion that allows land managers to thin small diameter trees to restore ecological processes (such as regular fire cycles), improve habitat for endangered species, and reduce fire hazard. (Organization, Placerville, CA - #A22653.30100)

Most forest fires are started by careless campers, vandals, and sparks from vehicles. Keeping an area roadless will do much to protect it. Most roadless areas are in remote areas and danger to homes and property is all too often overstated. (Individual, Sacramento, CA - #A8271.30000)

The vast majority of land area in all national forests is already accessible by roads and trails. Many areas are also not fire and disease prone. For example, the Tongass National Forest is virtually free of any fire danger and disease risk. Where disease and fire are risk factors for communities, adjacent property, or forest infrastructure, procedures may easily be developed and implemented to systematically address case specific problems while ensuring the fullest possible compliance with the letter and intent of the policy. (Individual, Douglas, AK - #A13479.30200)

How should inventoried roadless areas be managed to provide for healthy forests, including protection from severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreak?

The quick answer to this is that remote roadless areas generally do not need active management and fire protection. The best way to manage these forests is to leave them alone.

The national forests of the interior West have been subjected to a century of fire suppression and high-grading of timber, which have left the forests at increased risk of catastrophic fires and disease outbreaks.

Roadless areas, by their remoteness and inaccessibility, have been least affected by this misguided policy. Today they contain the healthiest forested landscapes in the mountain west. A comparison of the relatively inaccessible Selway-Bitterroot country in Idaho and Montana - having ubiquitous fire sign and park-like stands of large ponderosa pines and Douglas-fir - with the heavily roaded Wallowa-Whitman National Forest's overstocked, doghair stands choked with grand fir understories, says it all. (Organization, Seattle, WA - #A21694.30100)

**CONSIDER THAT FIRE FREQUENCY INCREASES AS ROAD DENSITY INCREASES**

Roads have had a profound effect on fire frequency, severity, occurrence, size, and fire regimes throughout the western United States (Habeck, 1990). Fire occurrence increases as road density increases because man-caused fire risk also increases. (Individual, Las Vegas, NV - #A5694.30430)

**1509. Public Concern: The Forest Service should conduct more studies about how to control fires.****SO THAT FIRES DO NOT GET OUT OF HAND AS A RESULT OF THE MANY VARIABLES THAT CAN AFFECT THEM**

Instead of building roads to allow better access to fires we should design a plan where we either attempt to clear out the dead wood that fuels fires or have controlled burns that can have a very positive effect on the environment. However, fire is difficult to control and more studies need to be done about how to control a fire so that it does not get out of hand as a result of the many variables that can affect a fire such as wind. (Individual, No Address - #A30364.30400)

**1510. Public Concern: The Forest Service should consider the impact of human activities on fire intensity and severity.**

It is important to note that Forests in unroaded, unlogged areas are the least altered from historic conditions, have the greatest ecological integrity and most fire resilience, and are at lower fire risk than areas that have been intensively managed. This is because roadless areas have not been subject to logging and concomitant activities that offer increase hazardous loads of highly-flammable small-diameter surface and ladder fuels, have not been as altered by fire suppression, especially compared to roaded and logged lands, and present the lowest risk of human-caused ignitions. Logging in wildlife habitat. It also takes massive federal subsidies because roadless area timber sales are some of the biggest money losers due to roadbuilding costs.

The primary cause of increasing fire intensity and severity is a century of aggressive firefighting, commercial logging, livestock grazing, and road building. Analysis of the 2000 fire season revealed that the majority of burned acres were located in logged and roaded forests, not in roadless or wilderness areas. In its report on last year's fires, the Congressional Research Service concluded,

"Timber harvesting removes the relatively large diameter wood that can be converted into wood products, but leaves behind the small material, especially twigs and needles. The concentration of these 'fine fuels' on the forest floor increases the rate of spread of wildfires."

In 1996 U.S. government scientists issued the Sierra Nevada Ecosystem Project (SNEP) report. The SNEP report found,

"Timber harvest, through its effects on forest structure, local microclimate and fuel accumulation, has increased fire severity more than any other human activity."

The scientists also determined that,

"Fire severity has generally increased and fire frequency has generally decreased over the last 200 years. The primary causative factors of fire regime changes are effective fire prevention and suppression strategies, selection and regeneration cutting, domestic livestock grazing, and the introduction of exotic plants." (Organization, Santa Fe, NM - #A22092.30100)

There will probably be less protection necessary, because roadless areas are by definition undeveloped; and because they haven't been logged, they will most likely have less slash and other fuels to carry a fire. Case in point: the Clear Creek Fire near Salmon, Idaho in the summer of 2000, burned hottest and with the most devastation in the Panther Creek drainage, an area that was heavily roaded and had been heavily logged over. That's a pretty typical scenario. So much for the popular fiction that roading and logging reduce fuels and the hazard of fire.

Besides, the Clinton Roadless Initiative took this very unlikely scenario into consideration and made generous allowances for such an eventuality, with loopholes big enough for an unscrupulous forest

supervisor to drive a dozen log trucks abreast though. This “issue” is a straw dog. (Individual, Leadore, ID - #A28841.30000)

### **1511. Public Concern: The Forest Service should consider other factors which may increase fuel loads and fire hazards.**

#### **WIND**

June 2001. 40 acres of my timber in forest crop program was flattened by tornado winds. Now I have a helluva job to clean this mess you and I can see what a terrible fire hazard it is. (Individual, Turtle Lake, WI - #A6075.30400)

The July 4th blowdown of approximately 50% of the BWCAW’s forest should have been a more than adequate warning that un-managed forests can be devastated at a much greater percentage than managed forests, and that designated roadless areas that experience this type of devastation are forest fire catastrophes waiting to happen. (Elected Official, Two Harbors, MN - #A15552.30100)

In exceptional cases where insects and fuels do become a hazard, an environmental impact statement for proposed action can be prepared. This was done in the Boundary Waters Canoe Area Wilderness after a 1999 storm left ten times the normal fuel buildup. (Organization, Minneapolis, MN - #A22652.30600)

#### **WEATHER**

Severe wildfires burn catastrophically according to the fire weather, not the absence of roads. Roads can create vectors for flammable exotic plants that increase damage to native plants and animals during fire events. Roads encourage the misuse of DFPX construction and backburn fire suppression attempts. I am currently commenting on a fire salvage operation that is being conducted on land burned by fire suppression attempts (backburning off of a road) that never even connected with the main body of the wildfire. Forests that have not been pierced by roads tend to have more old growth (fire resilient) stands. Forests have evolved for millions of years with fires and without roads. The increase in catastrophic fires is due primarily to timber harvest and its effect on forest structure (SNEP). (Organization, Chico, CA - #A25114.30300)

#### **SLASH PILES**

Slash piles on lands where trees are gone contribute to fires. (Individual, Spokane, WA - #A13986.30550)

As for “the buildup of hazardous fuels”, in the Intermountain and Great Basin West, and probably in much of the rest of the country, it’s too cold and dry for logging and thinning slash to be left on the forest floor and expected to decompose. Slash and other logging / thinning debris will just lay there and contribute to an even bigger fire hazard unless it’s chipped and scattered on site or completely removed from the forest - neither of which, are very economically viable propositions. (Individual, Dillon, MT - #A28767.30550)

In terms of forest protection, I fail to see how building more roads protects the forest. From experience, the forests on both private and public lands that have an infrastructure of roads are no less resistant to insect attacks, disease or wildfire. These roads only serve the purpose of allowing “pre-salvage operations” - allowing healthy trees to be harvested on the grounds that they would likely die anyway. Cutting out damaged stands (i.e. bug spots) does not necessarily halt the spread - sometimes it creates a larger threat - the presence of fresh slash. Additionally, humans serve as vectors of disease and wildfire-increasing human presence in these areas via roads may actually increase the threat of damage from insects, disease and wildfire. (Individual, Nickelsville, VA - #A30521.30100)

#### **SOME TREE SPECIES HAVE A NATURALLY SEVERE FIRE REGIME**

Forests were protecting themselves long before the FS showed up. Protecting the Forests for human values is what we are really talking about. I am suspect of plans that want to save forests from severe

wildfires. Some forest types (lodgepole pine, subalpine fir) only burn severely under natural conditions. That is what they do. Douglas fir/Ponderosa pine forests, at least here in Washington are overstocked with dog-hair stands, and are prone to “unnaturally” severe fires. But, these low elevation forests are already roaded and have been for decades. What is left in the roadless area is the hard to get stuff. If it was easy to build a road there it would have been done 30 years ago. Those roadless areas that are in need of thinning to get back to a low intensity fire regime should be helicopter, or horse logged. Yes, really. (Individual, Carlton, WA - #A30322.30100)

In forest systems that are naturally characterized by infrequent high intensity fires (e.g. Rocky Mountain spruce/fir and lodgepole pine forests, Pacific Northwest Westside forests, higher elevation Sierra Nevada forests), fires should be left to burn naturally in roadless habitats. In these systems, stand replacing fires help to recycle nutrients, open seeds of some pine species, and increase habitat heterogeneity at the landscape scale (maintain a healthy mixture of forest and meadow habitats that support many important plant and wildlife species). (Individual, Davis, CA - #A30523.30310)

Roadless areas should be managed to be sustainable. I would also add that in some forest types such as Rocky Mountain lodgepole pine and sub-alpine fir-spruce periodic stand-replacement crown fire are ecologically appropriate. These ecosystems are adapted to stand-replacement fires every 50-150 years or so. Removing fires of this type in these ecosystems will reduce forest health. It is another matter when talking about ponderosa pine and mixed conifer forests. These ecosystems have been drastically altered by fire suppression, livestock grazing, and past harvesting. They are in dire need of restoration and the majority of these areas are already roaded. (Individual, Berkeley, CA - #A30558.30300)

## *Adequacy of Analysis – Management Strategies*

### **1512. Public Concern: The Forest Service should evaluate its firefighting practices.**

[From ATT 3]

#### **WILDLAND FIREFIGHTING PROBLEMS**

Is the Forest Service doing all that they can to suppress our large wildfires?

When wildland fires escape initial attack capabilities of our local crews, a team is called in to take over the fire. Some team managers do not believe in fighting fire at night, or in putting retardant on the fire before noon. Almost all firefighters would agree that fighting fires at night is most effective because, in general, temperatures are lower, humidity is higher, wind speed has lessened, and the level of fire activity has decreased.

Putting the fire crews on the line around mid morning, and waiting until afternoon for retardant drops when the fire has escaped and is crowning, are not conducive to trying to control the fire. These practices have increased the cost in money and resource loss considerably. Retardant in the early morning would cool down hot spots and aid in line building so that fire might not escape during the afternoon.

The same team members who delay retardant drops till afternoon use the excuse that fire fighting is more dangerous at night. I have yet to see any statistics that prove this. This excuse also fails to explain why they do not encourage retardant drops in the morning, before the fire is crowning and carboniferous cumulus clouds have obscured visibility.

The same team members that wait till mid morning to fight the fire also want to evacuate private property owners, leaving their homes and land possibly unprotected. Citizens are intimidated by federal, state and county law enforcement officers and leave, only to return to the new Black Forest and the charcoal remains of their structures.

The Forest Service has policies such as the Minimal Impact Suppression Tactics, which encourage firefighters to construct firelines much too narrow to stop a fire and do not permit bulldozers and other heavy equipment in certain areas. Under the Clinton Administration proposed Roadless Initiative, not only are new roads [not] permitted in vast areas, but firefighting equipment such as engines cannot

utilize existing roads that have been there for decades. Old time firefighters would turn over in their graves if they could be aware of what is happening today.

Environmentalists have succeeded in stopping logging on federal land, and are now at work trying to stop state and private harvest units. They mislead the public into believing that logging units enhance forest fires, when the fact is that they greatly reduce the probability that a fire will turn into an inferno. With the removal of ladder fuels and a great many mature trees left, these almost resemble picnic grounds, and they certainly deter the spread of fires. Older harvest units (clear cuts), which contain young trees with much higher fuel moisture, protect stands of timber uphill and down wind from them. Pictures on the website show how these 15 year old clear cut units in Magpie and Hellgate Gulches on the Cave Gulch Fire have helped efforts to control wildfires.

Some environmentalists do not want retardant dropped on fires to help control the spread of wildfires because the retardant contains chemicals. Retardant is a fertilizer, ammonium phosphate, which will increase regrowth in the years after the fire.

Environmentalists also say that because fires have been suppressed in the past, this has led to major fires now. The year 1910 is still the worst fire season on record, but no one says that this was the result of earlier fire suppression attempts. Anyone who would advocate letting a wildland fire burn during a drought fire season, risking loss of life and property, is not rational. (Individual, East Helena, MT - #A20422.30400)

### **1513. Public Concern: The Forest Service should fairly and fully consider the effects of fuel management.**

Concerns for fire suppression and potential have been raised from both outside and within the agency. Some claim that roading and logging of roadless areas is necessitated by these concerns. But it must be remembered that “uncertainty exists among fire researchers concerning whether the number of acres burned annually by wildfires is always reduced by timber harvest . . . whether timber harvesting also reduces the final size of large wildland fires is debatable. Timber harvesting ‘opens’ up a forest [so] . . . after a fire starts, it can sometimes spread faster and become bigger.” (DEIS 3-156; see also 3-106). As for roadless areas, “since the amount of land area at risk to large wildland fires is so large compared to the small amount of road that could be built into those same areas, the effects in the near future to the fire suppression program are expected to be negligible. . . . the effect of timber harvesting is insignificant, as is the combined effect of no timber harvesting with no road construction, to the overall fire suppression program. . . . The direct effect on the wildland urban interface [WUI] is minimal because there are few populated areas adjacent to inventoried roadless area boundaries” (id.). There are numerous problematic issues even if one assumes that building a road into an area would limit future wildfires (DEIS 3-158).

One fact is foremost regarding this issue of fires vis-a-vis roadless areas: “Areas that are more highly roaded actually have a higher potential for catastrophic wildfires than inventoried roadless areas.” (DEIS 3-157). “Building a road into a high risk from catastrophic fire forest would increase the incidence of human caused fires.” (DEIS 3-158).

In Virginia on the GWNF a mean average of only about 4 fires per year are attributed to lightning (SAA Report 5 page 96). On the JNF approximately 90% of the fires will be human caused (1996 Analysis of the Management Situation page 2-48). Keeping all this in mind, it is unreasonable for the agency to conclude that air quality would be diminished by an increased risk of catastrophic wildland fires resulting from a prohibition on road construction and timber harvest (DEIS 3-46).

Because of the amount of acres the FS claims is at moderate or high risk from catastrophic fires (DEIS 3-101) coupled with the small amount of acreage in roadless areas that could potentially be treated for fuel management objectives (DEIS 3-104-106), it is entirely unreasonable for the agency to find that a prohibition of logging and roading “would seriously hamper the Forest Service’s goal of reducing the threat from catastrophic forest fires.” (DEIS 3-107). And it must be remembered that the potential risk for fires is much less in the generally much moister Eastern National Forests. The final EIS needs to substantiate that hundreds of thousands of acres are at moderate to high risk in the Southern and Northeastern NFs; the figures given appear to be greatly overestimated, particularly for Virginia and West Virginia (DEIS 3-103).

In addition, a fundamental tool for reducing fire hazard is the reduction or disposal of the small diameter and fine fuels (DEIS 3-100). Yet this is often not the on-the-ground reality. Logging predicated on reducing fire potential usually removes the fuels that least facilitate a fire's intensity and rate of spread (the large diameter boles) while the more hazardous small fuels remain on site. A perfect example of this in Virginia was the recent Hagan Hall emergency salvage sale on the Clinch Ranger District of the JNF. The affects of fuel management are not fully and fairly considered in the DEIS. (Individual, Staunton, VA - #A29325.30400)

#### **BEFORE A FINAL DECISION ON MANAGING AREAS AS ROADLESS IS MADE**

As stated above, roadless areas adjacent to Mammoth Lakes have been subject to decades of fire suppression, allowing fuel loading to increase to dangerous levels. A detailed assessment of fuels management should be completed before a final decision on managing as roadless is made. The Rainbow Fire of 1992 demonstrated how vulnerable the community is to wildfire beginning in roadless/wilderness areas. (Manager, Town of Mammoth Lakes, CA - #A19393.30110)

### **1514. Public Concern: The Forest Service should adequately analyze the appropriateness and need for prescribed fire.**

#### **IN THE UNIQUE SETTINGS OF THE ROADLESS AREAS**

The limited extent of fire suppression and management activities in roadless areas may render prescribed burning unnecessary. The EA fails to adequately analyze the appropriateness and need for prescribed fire in the unique settings of the roadless areas. Rather, the EA analyzes the vegetation conditions over the entire project area. Frost (199) addresses the lesser alteration of the vegetation conditions in roadless areas:

An analysis of scientific literature on the relationship between fire and forest management reveals that forests in roadless areas are the least altered from historic conditions and present a lower fire hazard than forests in managed areas, because they have: 1) not been subject to timber management activities that often create increased fuel loads and reduce resilience to fire, 2) have been less influenced by the effects of fire suppression than previously managed lands, and 3) the lowest risk of human-caused ignitions. (Organization, Missoula, MT - #A613.30300)

### **1515. Public Concern: The Forest Service should fully analyze restoration projects designed to address catastrophic wildfires.**

Restoration projects that are designed to address catastrophic wildfire risks must be analyzed fully within the context of the Roadless Rule, and such projects must ensure that adequate safeguards are taken to preserve the roadless and Wilderness qualities of the IRAs, including restrictions on types and sizes of tress to be thinned, limitations on sizes of openings, use of prescribed burns, total rehabilitation of forwarder or skid trails and general attention to site specific analyses that do not gloss over the biological differences exhibited between roaded and unroaded lands. (Organization, Denver, CO - #A8824.31100)

#### **TO ENSURE ADEQUATE SAFEGUARDS ARE TAKEN TO PRESERVE ROADLESS AND WILDERNESS QUALITIES OF INVENTORIED ROADLESS AREAS**

Restoration projects that are designated to address catastrophic wildfire risks must be analyzed fully within the context of the Roadless Rule, and such projects must ensure that adequate safeguards are taken to preserve the roadless and Wilderness qualities of the IRAs. (Organization, Littleton, CO - #A8829.30400)

### **1516. Public Concern: The Forest Service should address the cumulative impacts of the fire suppression program on national forests, and how it has impacted roadless areas.**

Should the Forest Service still deem it necessary to re-open discussion of the Roadless Rule, the following issues and concerns [should] be addressed along with the 10 questions in the ANPR.

The cumulative impacts of the fire suppression program on National Forests, and how it has impacted roadless areas must be addressed. (Business, Spokane, WA - #A22047.30100)

**1517. Public Concern: The Forest Service should reassess vegetation management on the national grasslands.**

**BECAUSE INCREASING VEGETATION HEIGHT AND SHRUB STRUCTURE ON THE UPLANDS AFFECTS FIRE CONTROL AND SUPPRESSION**

While the 2000 fire season forced the Forest Service to rethink its forest management strategy, there has been no comparable reassessment of vegetation management on the National Grasslands. The HAND comments addressed the concern about increasing vegetation height and shrub structure on the uplands would affect fire control and suppression. The transportation, OHV, and roadless policies all directly interfere with fire suppression and control by restricting access and prohibiting cross-country access. The catastrophic fire in 1999 on the Little Missouri National Grassland proves that the risk is real. However, the Forest Service has declined to change the proposed upland vegetation objectives, which will increase fuel loading, and reduce grazing, which would otherwise control fuel loading. Again, the Forest Service needs to comprehensively address this issue and to date it has failed to do so in North Dakota. (Organization, Denver, CO - #A21358.30100)

**1518. Public Concern: The Forest Service should evaluate the impacts of no management versus the impacts of roading or other management activities.**

It is essential that roadless areas be accurately mapped, including those areas at risk of wildfire and insects and disease so that management options can be accurately assessed. In our opinion, the draft and final environmental impact statements for the previous rule did not adequately address wildfire risk. It is imperative that the Forest Service requires that the risks and impacts of “doing nothing” be documented as well as an analysis of the risks or impact of roading or other management activities. In the final decision, the standards for no management on federal forest lands should be as stringent as any standard for management activities. (Association, Rockville, MD - #A13306.30100)

**1519. Public Concern: The Forest Service should conduct ecological assessments.**

**FOR ALL FUEL REDUCTION PROJECTS**

Conduct ecological assessments for all fuel reduction projects. The Forest Service should identify restoration priorities before any fuels reduction activities commence. This assessment should involve the public and provide an array of alternatives—not just commercial thinning — to address needs. For many areas, removing roads, invasive species, and cows, combined with prescribed burning, would be the best prescription for ecological restoration. (Organization, Missoula, MT - #A17234.30920)

**1520. Public Concern: The Forest Service should categorize inventoried roadless areas in accordance with fire regime, condition class, vegetation, and risk of disease.**

**AREAS AT GREATER RISK OF ECOSYSTEM DAMAGE FROM CATASTROPHIC FIRES SHOULD BE PRIORITIZED FOR APPROPRIATE TREATMENT**

Inventoried Roadless Areas (IRAs) should be categorized in accordance with fire regime and condition class and risk of disease, using the best available information. IRAs at greater risk of ecosystem damage through catastrophic fires should be prioritized for appropriate treatment, including commodity harvest if no other management tool appears feasible. IRA management guidelines should also include provisions for allowing temporary roaded entry into roadless areas in the event of catastrophic wildfires or tree-killing insect and disease outbreaks, so that commodity values can be captured and rehabilitation work performed at a reasonable cost. (Governor, State of Idaho - #A20141.30100)

**THEN CREATE A MANAGEMENT PLAN TO OBTAIN AND MAINTAIN DESIRED FUTURE CONDITIONS**

[Q10] I believe they all need to be inventoried and classified by the types of vegetation and fire regimes. Those that are adapted to low frequency, stand replacement regimes need to be differentiated from those that once experienced frequent, low-moderate intensity fire regimes. Once this is done then a management plan can be created to obtain and maintain desired future conditions. I think Wildland Fire Use (old prescribed natural fire) will be very important in these areas. There [would] certainly be constraints by managing wildland fire in many areas [that] would be appropriate. [In] other areas that once had high frequency, low-moderate intensity fire regimes, some mechanical treatments may be appropriate before re-introducing fire. We presently have millions of acres of roaded national forests with fuel hazard problems, I believe we should start to work in these areas. This work alone will take decades. I believe that active management is needed in all forested areas of the US. Some areas may use mechanical methods more, others such as many roadless areas should manage wildland fire to obtain the desired future conditions. Developing more partnerships with state, local, and public groups is good but it will not provide a fast solution to this problem. (Individual, Berkeley, CA - #A30558.30400)

**1521. Public Concern: The Forest Service should consider that thinning has not been shown to systematically reduce the intensity of wildfires.**

Assertion: roadless area decisions should protect forests from wildfire, insect, and disease impacts (p. 4). In fact, road building is associated with increased fire starts and the spread of harmful invasive species and pathogens. Roadless areas are among the lands least in need of remedial management. And the silvicultural management restricted by the Roadless Rule, thinning, has not ever been shown systematically to reduce the intensity of subsequent fires. (Organization, Olympia, WA - #A20145.30100)

**1522. Public Concern: The Forest Service should allow public review of the Wildland Fire Management Policy.**

The Wildland Fire Management Policy must be publicly reviewed and cleansed of all the Clinton-Gore-Babbitt holistic forest agenda. The idea of allowing natural or manmade wildland fires to burn for the reduction of hazardous surface, litter and canopy fuels is insanity. We have 35,000,000 in this state and utilization of fire for the reduction of fuel is out. (Professional Society, Chico, CA - #A29719.30410)

**Funding****1523. Public Concern: The Forest Service should evaluate costs and funding associated with fire management.****FIRE SUPPRESSION COSTS**

Suppressing fires and cutting trees ostensibly to save forests also burn the taxpayer. A new report published by taxpayers for Common Sense finds that mismanagement of National Forests made the 2000 fire season the most expensive fire year in history. The government spent a record \$1.6 billion fighting the worst wildfires our nation has seen in decades. According to the taxpayer group, federal policies “encourage spending unlimited amounts of money attempting to put out every fire. This increases firefighting costs and jeopardizes firefighters’ lives by subjecting them to unnecessary risks.” The report also criticizes Congress for having made little effort to control firefighting costs, which has increased by 50 percent over the last two decades. Congress gives federal agencies bottomless emergency budgets for firefighting, with little auditing to examine how they spend money. In reality, Congressional funding priorities have exacerbated the wildfire situation by impeding natural fire regimes and subsidizing commercial logging on public forests. The Forest Service’s funding has become a vicious cycle. Taxpayer money is used to log the National Forests to benefit timber companies, which contribute to the escalating risk of catastrophic wildfire. Then, huge additional sums of taxpayer money are spent trying to put the fires out. (Oppenheimer 2000) (Organization, Nevada City, CA - #A4941.30900)

As noted above, logging roads are typically high risk/high hazard areas since they are sites of frequent human ignitions and dense flammable fuels. However, it is acknowledged that roads can, at times, help fire suppression efforts because they provide the cheapest, safest means of transporting large numbers of firefighters (although traffic accidents are a major source of serious injuries and fatalities on wildfires). Roads also provide access for heavy equipment such as bulldozers, water trucks, and fire engines. Roads also provide a ready-made fireline for backfire/burnout operations which, ironically, can increase the total amount of burned acreage. Indirect attack strategies automatically sacrifice acreage to the wildfire, especially if large backfires are ignited; thus, another paradox: wildfires often increase in size in the act of trying to contain and control them.

The USFS created standing crews of smokejumpers, hotshots, helitacks, and helirappellers for the purpose of initial and extended attack fire suppression in roadless areas. The speed, mobility, and versatility of aerial-based fire suppression forces are making them more attractive to fire managers. While it can cost thousands of tax dollars to purchase and maintain a fire engine, it can only be used efficiently by a small crew (approximately 3-5 workers) and its use is largely restricted to a single District on a single Forest. The same amount of money invested in aircraft and associated crews and equipment can be mobilized to protect whole Regions or can be dispatched nationally or internationally depending on the need, and can be more easily shared among other federal, state, and local fire protection agencies. Consequently, given modern technology and the huge number of helicopters and fixed-wing aircraft available for fire suppression duty, roads are not necessary in order to suppress fires. (Organization, Eugene, OR - #A21798.30200)

#### **FIRE SUPPRESSION COSTS AND CONTROLLED BURN FUNDING**

The American taxpayer simply cannot continue to afford the high prices of controlling wildfires through aggressive suppression efforts. This is because years of suppression has built up fuel loads beyond where they can be safely burned, even under controlled conditions. The best way to bring this fuel loading back into balance with historical conditions is with controlled burning, because logging and thinning do not address the standing log volume that represents much of the risk. However the Okanogan National Forest states that their requested Congressional budget for controlled burns is 90% short of what they requested as necessary. (Organization, Winthrop, WA - #A20338.30420)

#### **FUNDING FOR FIREFIGHTING**

Laverty should know that pre-settlement fires, wilderness fires, the Bitterroot fires on logged-over lands, and even controlled fires have all burned so hot that "some places will take centuries to recover." In the post-firescape of the Scapegoat Wilderness, stark, with nearly all snags still standing since 1988, some reproduction grows as thick as grass while other areas show little or no generation of any flora. But his excessive caveat, "devastating," gets not only outlays for smokejumping, hot-shot crews, air-tanker support, and large standing armies of firefighters, but now, rural-urban fire protection and forest-wide controlled burning.

Fire is money. The fire suppression problem your agency moans about was created mainly by funding for fire suppression, now a bigger money maker than logging. Now the agency claims that bio-mass loading threatens the old-growth communities that it prefers to destroy by overcutting.

The National Fire Plan is primarily a logging plan. Sixty percent of its funding, according to Laverty, will pay for fire protection in the rural-urban interface, another big FS money-maker. This funding would be more equitably spent buying interface lands for parks and recreation spaces that would be turned over to counties for fire protection. (Individual, Corvallis, MT - #A5960.30400)

It is also obvious to me that making some decisions will mean that large wildfires may inevitable. That also must be a factor in the decision process and not an excuse to get Congress to buy a bigger fire engine and crew. The place of fire as an ecological perturbation and the phenomenon's about it must be accepted in the western US, but the money thrown at it in the name of control must be re-evaluated. (Individual, Cambridge, ID - #A11714.30300)

**THE USE OF FUNDS APPROPRIATED FOR FUELS REDUCTION PROJECTS IN THE WILD-URBAN INTERFACE ZONE**

Last year Congress appropriated an additional \$120 million for fuels reduction projects in the urban-wildland interface zone. Instead of directing resources to protect communities, however, the Forest Service is using emergency monies for large-scale commercial timber sales in the nation's most pristine forestlands, including roadless areas, old growth forests, and habitat critical to imperiled species—areas far from homes and businesses and at least risk of catastrophic wildfire. In testimony before congress, the agency admitted that only 25 percent of the acres treated were in urban-wildland interface areas. (Organization, Nevada City, CA - #A4941.30900)

**CONSIDER THAT REDUCED ACCESS INCREASES FIREFIGHTING EXPENSES**

Idaho was hit extremely hard during the summer of 2000 by forest fires; the roadless areas hampered access to the areas for fire suppression. The control of the fires could have been faster and more effective had the fire crews been able to reach the areas effected. The cost to the state and the federal government would have been much lower with more adequate access to the fires. Reducing road access, by implementing the "roadless" policy, would make fire fighting even more difficult and expensive in the future. (Elected Official, Council, ID - #A20732.30200)

On the Rogue River NF (RRNF), there are areas mapped in the Applegate Valley and down into the Ashland (Bear Creek) drainage. There are areas identified in the Plans which do not allow road construction; they therefore do not need to be considered here. They should be reconsidered in the next round of forest plans for the RRNF. There are far more areas shown as allowing road construction that are "inventoried". These should have NO additional restrictions placed on them.

On Aug 9, 2001 a dry lightning storm ignited the Quartz fire in this area. It quickly grew to 5000 acres on USFS, BLM and private lands, and destroyed 2 homes. The single greatest impediment to effectively fighting this fire was access; the roads (especially on USFS) were not adequate. This \$10+ million fire probably cost twice as much to control due to sustained use of air attack as it would have with adequate roads. The area burned is not an inventoried area but was burning towards one. With the weather conditions we had, if it had burned east and into the Wagner Butte roadless area, there would be no stopping it until it burned down to the city of Ashland. There was unbroken fuel and no roads to gain access. Fortunately this did not happen as the weather moderated.

Much of the area you show in light gray on the maps in the Applegate have this same fuel type, and they will indeed burn in the future. Is restricting access responsible management? I don't think so. Who will benefit? Not any local residents. Is this how I want my public lands managed? Absolutely not. (Individual, Medford, OR - #A27917.30200)

**CONSIDER THAT THE MAJORITY OF FIREFIGHTING FUNDS ARE SPENT ON PROTECTING STRUCTURES IN DEVELOPED AREAS**

The Forest Service spends the vast majority of its firefighting budget on protecting homes and other structures in developed areas, not in fighting fires in roadless areas. (Individual, Dutton, MT - #A17073.17100)

**1524. Public Concern: The Forest Service should not use tax dollars to fund firefighters and their equipment.****BROUGHT IN FROM DISTANT PLACES RATHER THAN THE LOCAL AREA**

I am asking a study be originated showing the forest service fire expense for transportation of individual labor from distant places such as California, Australia and equipment from the Midwest and East while refusing to hire individuals and equipment who have made a lifetime livelihood locally for themselves and their families from our timberlands. People who have the vested interests in protecting the forest from fire destruction. My personal opinion is that the Forest Service action to eliminate qualified local firefighters and their equipment from the fire line is criminal and the tax payers should not be required to fund any such irresponsible actions. (Individual, Kalispell, MT - #A8758.30910)

### USE THE MONEY FOR OTHER PURPOSES

Economically, I am concerned that limited taxpayer dollars be put to better use than fire suppression in roadless areas. There are certainly many highly constructive (e.g., cancer fighting, land protecting, education supporting, etc.) programs in vital need of these funds, which are currently wasted on fire suppression that results in unhealthy forests and the use of toxic chemicals to combat fire. Furthermore the equipment that is used in such fire suppression operations results in noxious weed invasions and the need for expensive measures to control them. Fire suppression in roadless areas is just as bad economically as it is ecologically. (Individual, Davis, CA - #A30523.30910)

### 1525. Public Concern: The Forest Service should not use tax dollars for fire suppression and timber removal.

#### IN ROADLESS AREAS LOCATED FAR FROM RESIDENTS

Fire plays a vital role in western forest and rangeland ecosystems. As a natural disturbance agent responsible for recycling nutrients, regenerating plants, and sustaining diverse wildlife habitats, fire is necessary for the continued productivity of these ecosystems. Certainly, efforts should be made to protect communities in the urban/wildland interface zone, defined as the area "where combustible homes meet combustible vegetation." But pouring taxpayer dollars into suppressing fires and logging in roadless forests located far from residents makes little sense. (Individual, Oklahoma City, OK - #A17236.30300)

### 1526. Public Concern: The Forest Service should contract with an independent organization to analyze expenses associated with fire management if roads are destroyed.

As lifetime resident of an area relying on the timber I have been vitally concerned with the proposal for the treatment of Federal roadless areas. My purpose in this letter is to ask and if necessary demand that the USDA Forest Service immediately enter into a contract with a qualified, independent, impartial organization capable of providing the following information:

The expense of destroying forest roadways created by logging contractors added to the cost of creating fire lines through the timber lands versus rights-of-way through timber regrowth involving old roads . . . always in place not requiring a great deal of forest destruction. It seems to me that it is far less expensive to utilize an unmaintained road right-of-way as a fire line when needed as opposed to creating an entire new fire line often destroying much of the timber in its path not yet on fire. Added to the cost of destroying roads, creating new fire lines should be destruction of culverts in place. (Individual, Kalispell, MT - #A8758.30200)

### 1527. Public Concern: The Forest Service should consider that as fuel loads increase in roadless areas, firefighting costs also increase.

New roadless areas will experience an increase in the forest fuel load. This will mean an increase in fire fighting costs for the Forest Service and the Minnesota DNR. Areas experiencing forest fires can only be accessed from the air. (Elected Official, Two Harbors, MN - #A15552.30100)

### 1528. Public Concern: The Forest Service should provide funding to conduct controlled burns and non-commercial thinning.

#### TO REDUCE WILDFIRE

Provide them with funding to conduct controlled burns and non-commercial thinning if you really want to reduce wildfire. (Individual, No Address - #A29646.30100)

Fire plan funding to treat fuels is a great program and needs to be continued. (Organization, Wenatchee, WA - #A22628.30410)

**1529. Public Concern: The Forest Service should take into account the effects of a national roadless rule on the costs of fire management.****NEGATIVE EFFECTS**

Fires cause the loss of many of our natural resources for use, which in turn lose us dollars, extreme amount of dollars are used for fire control and management—and an undetermined cost occurs in the costly price of lives lost. (Individual, Lloyd, MT - #A27949.75600)

In reality, Congressional funding priorities have exacerbated the wildfire situation by impeding natural fire regimes and subsidizing commercial logging on public forests. The Forest Service's funding has become a vicious cycle. Taxpayer money is used to log the National Forests to benefit timber companies, which contribute to the escalating risk of catastrophic wildlife. Then, huge additional sums of taxpayer money are spent trying to put the fires out. (Individual, Washington, DC - #A30150.75610)

**1530. Public Concern: The Forest Service should ensure that emergency funds are spent in areas where wildfire truly threatens communities.**

Ensure emergency funds are spent in areas where wildfire truly threatens communities and mandate environmental safeguards for fuels reduction projects. (Organization, Nevada City, CA - #A4941.30900)

**1531. Public Concern: The Forest Service should continue its current fire plan funding to treat fuels in the wild-urban interface.**

Assistance for addressing the current wildfire risk in the wildland-urban interface is essential. The public benefits from reduced suppression costs and losses far outweigh the cost of this assistance. The current fire plan funding to treat fuels is a great program and needs to be continued. (Organization, Wenatchee, WA - #A22628.30410)

**1532. Public Concern: The Forest Service should take legal action against organizations which have blocked fuel load removal.****TO RECOVER COSTS FOR FIRES THAT HAVE RESULTED FROM SUCH LACK OF ACTION**

It's my perception that the Wilderness advocates are unrelenting, they have no inclination to compromise, and they have the finances to sue to get their way. How does any individual or organization work with that type of attitude? I believe the Forest Service must work with those who will, and adapt a tougher stance against those who won't come to the table and compromise. I'd like to see the Forest Service sue the organizations that have stymied fuel load removal for the cost of the fires that have ultimately occurred for lack of action in this regard. (Individual, Centerfield, UT - #A25652.15000)

**Education****1533. Public Concern: The Forest Service should educate the public.****ABOUT FIRE SAFETY**

Since so many forest fires are started by campfires, all those entering should have a fire safety lesson. (Organization, Cookeville, TN - #A5451.30610)

**ABOUT THE REASONS FOR CONTROLLED BURNING**

Adequate knowledge of local conditions together with scheduled controlled burns should be implemented. Due to the over suppression of forest fires in the past, there is the possibility of controlled burns getting out of control but this should not stop the practice. The public should be better educated on the reasons for controlled burns. (Individual, Tucson, AZ - #A4938.30420)

### ABOUT THE ROLE OF FIRE AND DISTURBANCE IN FORESTS

The Forest Service clearly needs to help educate the public as to the role of fire and disturbance in our forests. (Individual, Missoula, MT - #A6143.30310)

As far as wildfire and disease outbreak, any ecologist worth his/her salt knows that fire is a natural forest event, and that fire is one of the ways that nature cleanses herself of disease and rebuilds herself. I believe that forest education about fire and some other measures to protect humans should be taken. We can not stop forest fire. It is impossible. And we saw in Florida a couple years back that if we abandon controlled burning and other forest management practices, the buildup of fuel will cause catastrophic fires. We are trying to make nature stop doing what it has been doing for millions of years; we will not win that war, no matter what politicians say. (Individual, Baton Rouge LA - #A30621.30300)

### ABOUT WHAT IS NEEDED TO SUPPORT FIREFIGHTING EFFORTS

I do not know exactly what would be needed to support firefighting efforts and would appreciate being educated about that matter. (Individual, No Address - #A26070.30610)

## Active Management

### 1534. Public Concern: The Forest Service should use various techniques for fire prevention.

#### IF REQUIRED BY MANAGEMENT OBJECTIVES

As far as wildfire is concerned it has been a part of the natural forest regime as far back as we can find evidence in the charred remains of preexisting forest on the Olympic Peninsula. Henderson et al, did studies of old fire occurrences as part of their basic work for the preparation of the Forest Plant Associations of the Olympic National Forest R6-ECOL-TP 001-88 1989, and found that there were very few fires of appreciable size in the east side of the Forest 480, 680 and 750 years ago, while much of this area had burned several times in the past 700 years. If management objectives for the area identify prevention of severe wildfires as an objective then a regime of preventive measures can be prescribed. Many techniques are available. Most of these were identified in the Regional Forest Fire Planning effort in Region 6 in the mid 1970s which was never completed. It is possible that written copies of the plans and atlases that were prepared then are still in existence in some archive somewhere.

With the current interest in wildfire suppression and the recent deaths of the 4 firefighters on the Okanogan-Wenatchee Forest there will probably be a one, possibly two year, spurt of interest in wildfire and prevention, but as has happened previously it'll probably pass away until we have to relearn the lesson again in 5-10 years. (Individual, Olympia, WA - #A278.30610)

#### MONITORING

If enough monitoring is set up, wildfires can be detected early and hopefully controlled away from populated areas. (Individual, Rego Park, NY - #A5996.15161)

#### GRAZING

On the National Grasslands, the Forest Service plan for roadless areas needs to include provisions to manage coulees, etc. so that wildfires can be effectively controlled quickly. The only way to effectively manage for healthy grasslands is with livestock grazing. (Association, Watford City, ND - #A29131.30500)

The catastrophic fire in 1999 on the Little Missouri National Grasslands proves that the fire risk is real. However, the Forest Service has refused to change the proposed upland vegetation objectives, which will increase fuel loading, while reducing grazing. Reasonable, efficient livestock grazing is a proven method of controlling fuel load and should be maintained. At the same time, sound scientific data has also demonstrated that livestock grazing adds to the healthy plant growth of rangeland.

The HAND group comments earlier addressed these concerns about increasing vegetative height and shrub structure on the uplands and the impact on fire management. However, it was ignored.

The roadless policies all severely restrict fire suppression and control by restricting access.

Those same policies and regulations also hamper grazing associations' efforts to control and eradicate noxious weeds, which can be a problem on the National Grasslands if not properly managed. (Association, Bismarck, ND - #A30187.30560)

Several actions are available for management of healthy forests: prescribed burning, limited grazing (proper charges should be levied against ranchers for this to help offset Forestry Service Costs) and even logging of diseased or dead trees can be used for this purpose. These actions must be balanced based on the health of the land, not the pocketbook of the interested parties. (Individual, Boulder, CO - #A5288.30100)

We believe the rules must be flexible enough to allow road building in areas so excess vegetation can be mechanically treated or to manage fires once they start. In addition, the agency has failed to consider the use of livestock as a means to control vegetation. Livestock have proven effective in controlling vegetation. Any new rules for roadless area should consider how we compensate our ranching families who can help protect this tremendous resources, (Association, Sacramento, CA - #A23478.30500)

Grazing cattle on the forest cuts down on the risk of forest fires. The cattle get rid of the dead grass and overgrowth that could be fuel for fires. (Individual, Manti, UT - #A20336.30560)

The lands need to be managed with excellent data on long term affect and renewal of these lands, wildlife and present use. We have already seen to many pendulum swings from one group to another. The Idea that all fires are bad is an example. Fire is part of a healthy forest and forest renewal. We get horrible fires because they have been prevented them for so long and limited grazing thus allowing deadfall and dead grass to build up. These could be avoided by responsible grazing, controlled burns and wildlife management. It is well known that hoof action on meadows and grazing renews meadows and keeps them alive. Without animals the meadow dies. Ranches are not the enemy. Most realize this and do not allow their range to be over-grazed. (Individual, Oak City, UT - #A40530.30100)

### **1535. Public Concern: The Forest Service should control fire size and frequency on public lands to approximately that of pre-settlement conditions.**

#### **BY REDUCING FUEL LOADS THROUGH THINNING, GRAZING, AND PRESCRIBED BURNING, AND BY MAINTAINING NATURAL AND ENGINEERED FIREBREAKS**

The overall goal is to reduce the cost and requirements of federal fire suppression activities on all public lands, including roadless areas, while also reducing the risk of suffering a catastrophic fire. With this goal in mind and with the exception of urban interface lands, land management agencies should be required to control fire size and frequency on public lands to approximately that of pre-settlement conditions. This goal can be accomplished by reducing fuel loads through thinning, grazing and prescribed burning, and by maintaining natural and engineered firebreaks. Considering how this might apply to roadless areas in Nevada, resources might be focused on managing invasive weeds (i.e., cheat grass), reducing the density of invasive juniper stands, reducing the density of dry forage, and identifying and improving the quality of natural fire breaks. (Elected Official, Eureka County, NV - #A20741.30500)

### **1536. Public Concern: The Forest Service should reduce fire hazards.**

#### **BY EMPLOYING YOUNG PEOPLE**

This need for fuel unloading where fire has previously been suppressed, offers a wonderful opportunity to provide lots of jobs for our young people that will help them to develop and maintain discipline and strong healthy bodies. So much hard work on the hazardous fuel loading that has resulted where fire was

suppressed needs to be done making the forest ready for the natural reintroduction of the fire regimes of the various areas. No roads or heavy equipment are needed for this, and the huge amount of money fighting fires could be used instead more and more for this as catastrophic wildfires consequently would diminish. This would be a much better bargain in terms of dollars spent, the health of the forest, and of the people participating.

The California Conservation Corps is a good example of such a cadre. When allowed to remain in, or once returned to their wild stage, fire and insects will no longer pose such large and grave dangers. This was recently born out by a huge fire nearby in a Wilderness which was a 'good burn' and only in areas which were back-burned was the fire hot and destructive. (Individual, Saint Paul, MN - #A19042.30410)

#### **BY ACTIVELY MANAGING TO REDUCE FIRE HAZARDS**

We should continue to be involved in the management so we do not have a forest that looks like Yellowstone. That is beautiful country and it is a shame that the timber that was lost by fire is not used for fire wood or a milling process that could produce lumber and clean up which will help the new growth and bring that forest back quicker then to let the wood turn into dirt. Bottom line is that the forest will change we need to manage it to provide the best output for the forest and again benefit the economy and put people to work. (Individual, Elko, NV - #A4853.30300)

With regard to federally-owned forests, 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 reduce the amount of fuel in the forests so that fires could be localized. It would help revitalize the economy in areas depressed by government prohibitions on lumbering, and would further restore woodlands where fallen trees are infested by insects. Overgrown forests fed the devastating fires at Los Alamos and throughout the West that may cost over \$500 million. (Individual, Peachtree City, GA - #A402.30410)

What they are not doing well is keeping the federal lands in these areas clear of hazard fuels. I have often asked why they do not. One answer has been that it is the fault of the environmentalists-that the fallen dead trees must remain to provide habitat. The other answer I have heard (from a FS employee, management), unique to our area, is that because there is a proposal to build a ski resort here, the FS cannot clean up the forests in the area because that forest activity would add to the cumulative effects which might prevent the development of the resort. Thus, our lives and properties are at risk for the sake of a resort which might or might not be built and which many locals do not want. We need action, not excuses. (Individual, Klamath Falls, OR - #A5118.30510)

#### **BY DEVELOPING A FIRE MANAGEMENT PLAN**

Green forests where fires have been suppressed for long periods do provide more fuel for future blazes. Yet a "let it burn" policy isn't practical in a nation where the deepest point of wilderness is no more than 30 miles from a road. Growth within and surrounding our national forests requires maintaining a wise fire control policy that takes into consideration forest health, climate patterns (both long and short term), forest type (i.e., dry lodgepole vs. wet cedar), best containment, and after-the-fact management. (Individual, West Yellowstone, MT - #A1045.30400)

Direct the Forest Service to create fire management plans for National forests. Fuels reduction monies should be used for fire planning and preparedness. Fire management plans would enable land managers to allow certain remote wildland areas to burn under carefully prescribed conditions to maximize ecological benefits. Such plans would encourage the agency to manage fires at a reasonable cost, while prioritizing firefighter safety and protection of natural resources. (Individual, Davis, CA - #A6615.30410)

#### **BY ALLOWING THE CLEARING OF UNDERBRUSH DURING THE INTERIM**

It stalls a process that is absolutely necessary if we are to save our forests, the wildlife within it, and the millions of Americans who depend on well managed forests to ensure their properties are not destroyed, and cannot afford delay in clearing out the underbrush to reduce fires. This work could be done RIGHT

NOW since the existing rule fully allows for such clearing. The rule was finalized after extensive input from experts on wildfire, who explained that “roading” and “clearcut” logging actually increase the likelihood and severity of these events. (Individual, Olympia, WA - #A5377.30100)

#### **BY ALLOWING MANY SMALL BURNS**

The most catastrophic fires are not natural events but are caused by people, especially large-scale logging and tree plantations that screw up the age distribution, so reducing conventional logging and plantations is the first priority. Learn from the Indians and Nature, who did lots of small burns, resulting in a mosaic with low brush loads that is highly resistant to catastrophic fires. The more relevant unasked question is, how should communities be protected from unnatural events such as landslides, erosion, sedimentation, water quality degradation, habitat damage, poisons, and loss of fishing livelihoods, all caused by conventional logging and mining? (Individual, Oakland, CA - #A28134.30100)

#### **BY CLEARING FUEL IN AREAS 40-100 METERS SURROUNDING COMMUNITIES**

The current proposed Roadless policy allows roads to be built in roadless areas to protect life or property. All the current research points to the areas within the first 40-100 meters surrounding a community as the place where clearing to prevent fires should be concentrated. (Individual, Davis, CA - #A11711.30400)

#### **IN ALREADY ROADED AND ACCESSIBLE AREAS ADJACENT TO ROADLESS AREAS**

The fire occurrence data in DEIS, Vol I, 3-157, states that larger and more frequent fires occur outside roadless areas. In fact, it states that a human-ignited wildland fire is nearly four times as likely to occur outside of a roadless area. Given this information, I would suggest that roadless areas would best be protected by implementing husbandry prescriptions and fuel load reduction treatments deemed appropriate by the Forest and District on already roaded and accessible areas adjacent to roadless areas. The FS would use its already existing fire prevention and suppression plan as well. (Individual, Klamath Falls, OR - #A4970.30500)

#### **BECAUSE FIRES OFTEN DO MORE HARM THAN GOOD**

FIRES: Yellowstone Park after the 1988 fire! They said it was good for it to burn, but it is good only for just a few years. The new trees will get tall, shade the grass and the grass will die. The dead trees will fall down and it will be hard for the animal to get through, leaving lots of fuel close to the ground. When the next fire goes through, it will get the ground so hot, it will sterilize it. Then trees may not grow back for years. If it takes a long time to grow back, erosion will take place. (Individual, Bonner, MT - #A958.30300)

### **1537. Public Concern: The Forest Service should use prescribed burning techniques as a tool to reduce fire danger.**

Given the limited logging, roadbuilding, fire suppression, and other management that has occurred within roadless areas, the fire regimes within roadless areas are still largely within natural patterns. Hence, little fuel reduction should be necessary. As small diameter fuels (less than 3 inches in diameter) are the primary vector of fire spread, these fuels can be effectively treated with prescribed fire if deemed necessary. As prescribed fire may differ markedly from natural fire, the impacts of prescribed fire should be thoroughly considered (Tiedemann et al 2000). (Organization, Missoula, MT - #A613.3420)

This lesser alteration in IRAs often results in lesser fire intensity, According to the Interior Columbia Basin Assessment:

Frost (1999) outlines the characteristics of roadless areas that may result in prescribed burning being appropriate:

Nevertheless, there are numerous roadless areas in various parts of the country that could legitimately benefit from proactive fire/fuels management using prescribed fire. What is needed are: 1) a standardized set of guidelines for identifying and prioritizing roadless areas based on their fire hazard and risk at the national or regional level, and 2) a subsequent step down process for planning fire

treatments at the local level that allow fire to play a much more important role while at the same time minimizing risks to ecological values.

Development of a comprehensive set of criteria for prioritizing roadless areas for prescribed fire treatments is largely beyond the scope of this paper. However, the following list of roadless area attributes provides an initial starting point:

- majority of area covered by dry forest types that historically were characterized by low intensity/high frequency fire regimes.
- high levels of horizontal and vertical continuity of fuels across large, contiguous areas (e.g. high stand densities and/or highly flammable fuel loads).
- long interval since last major fire (e.g. missed more than two severe natural fire cycles).
- topographic and elevational homogeneity (e.g. gentle terrain), where fire fighting efforts have more likely influenced fire behavior and also allow for relatively low-risk fire treatments.
- absence of significant natural barriers to the spread of fire (e.g. rocky terrain, non-forested vegetation, waterways, etc.)
- close proximity to the wildland-rural interface, major population centers, transportation routes, residential developments and other infrastructure (where fire risk is high) absence or low density of threatened (Organization, Missoula, MT - #A613.30420)

#### **IN AREAS OUTSIDE OF WILDERNESS OR ROADLESS AREAS**

We already have a let burn policy for wilderness areas - may we not extend that to roadless areas, where conditions permit? In other areas, why not implement burn programs, guided by foresters and scientists to achieve a desired future condition? Where necessary (feasible) firebreak swathes (not roads) could provide suppression opportunities. (Individual, Craig, AK - #A778.30400)

#### **IN LATE FALL**

I strongly support prescribed burns done in very late fall, the huge fire in New Mexico proved that timing is essential in doing the burns without destroying a forest. (Individual, Boise, ID - #A64.30420)

Prescribed fire to reduce fuel loads is the only practical answer. I first experienced the results of "let burn" and "loose herding" in 1979 on the Galligher Peak and Mortar Creek fires. Both became expensive disasters. Since then I have seen several similar situations including Yellowstone in 1988. My best recommendation is prescribed fire in the fall when winter has a chance of preventing a catastrophe and be prepared to face the consequences when it does not work as planned. (Individual, Moscow, ID - #A5380.30420)

#### **IN FORESTS WHICH BORDER COMMUNITIES**

Forestland bordering communities and subdivisions should offer periodic prescribed (controlled) burns, emphasize local education to encourage ground cleaning and brushing around homes. (Individual, Bayfield, CO - #A13395.30400)

#### **EVERY FOUR TO FIVE YEARS**

I believe that small burns should be performed every 4 to 5 years to keep the forests healthy and the fuels low. Now that many of the large fuel supplies were burnt, the time is right to keep up with the prescribed burning practice. (Individual, Boise, ID - #A209.30420)

#### **AT LOW-RISK TIMES OF THE YEAR**

The best way to maintain healthy wild forests is to keep them roadless, which allows natural processes to proceed. A century of aggressive fire suppression has resulted in a serious build-up of fuel in many parts of the West. But cutting down all the trees is like cutting off the nose to spite the face. Prescribed burns at low-risk periods of the year would help to reduce the build-up of fuels without destroying the forests that the curative methods are supposed to protect. The Forest Service's own figures show that less than 2% of the inventoried roadless areas are at risk for insects, disease or fire. Recent studies have also demonstrated that most of the fires start in developed areas, not in the roadless areas. (Individual, Seattle, WA - #A17841.30100)

**WITH GUIDELINES ESTABLISHED IN THE FOREST PLANNING PROCESS**

Prescribed fire for forest health, fuel reduction and wildlife should be allowed. Guidelines should be decided at the forest plan level. (State Agency, Social Circle, GA - #A22054.30420)

**ONLY AFTER PREVENTATIVE STEPS TO REDUCE FUEL LOADS ARE TAKEN, SUCH AS HARVESTING, THINNING, AND GRAZING**

Forests should be harvested, grazed, and thinned to keep the fuel load in check. Prescribed burning can be done ONLY after those fire-preventative steps are taken. Site-specific clearcutting should be used to prevent the spread of insect infestation or disease. "Inventoried" roadless areas should be "opened" to access to take those necessary steps. In many areas that I am familiar with, logging companies must "close" their roads after a timber sale, which includes cutting water-bars and seeding grasses to prevent erosion. (Organization, Three Rivers, CA - #A28739.30200)

**TO REDUCE THE ECOLOGICAL IMPACTS OF FIRES AND FIREFIGHTING**

For the prevention of insect and disease outbreaks, to minimize the impact of these outbreaks, and to reduce the potential for large-scale wildfires, the best option is prescribed burning. Rather than spending money building roads so that privately owned timber companies can profit off of national timber, use the money to hire ground crews to burn the forest bit by bit. The only way to limit fuel buildup is to burn periodically. Simply removing the smaller trees won't work because brush will still accumulate without them. Burning will also keep both endemic and epidemic pest and disease outbreaks to a minimum. You don't need roads and fire breaks to prevent fires. You need people setting many small-scale, prescribed fires under appropriate weather conditions. Fires are inevitable. Preventing fires is no justification to fragment millions of acres of habitat unnecessarily with superfluous roads.

Another reason to implement the proposed roadless rule is that fighting fires also causes ecological disturbances. Bulldozed firebreaks can lead to erosions, invasive foreign weeds can take hold there, wetlands are destroyed, and fire retardant dropped from airplanes can harm frogs and other amphibians. So, fighting the fires doesn't work, and suppressing the fires doesn't work, so prevent the fires by designing a prescribed burning scheme, hire adequate, experienced staff to carry it out, and implement it. That will result in significantly fewer large-scale wildfires and the taxpayers will probably save money in the long-run from the decrease in the exorbitant costs associated with fighting fires.

It is important to note that as of August 30, 2001, only 1/7 (14%) of all lands burned this spring and summer were part of the National Forest System. Therefore, the Forest Service should have fought only 14% of all fires this year. This compares with the figures for the last 5 years that less than 1/5 (20%) of all land burned in the Western United States was in National Forests. Being that such a small percentage of the fires actually occur on federal property, fire is clearly not the widespread problem that the media is making it out to be. With an adequate prescribed burning regime in place and staff to carry it out, the fire issue should be relatively minor, rendering the notion that we have to cut the forests to prevent fires and pest outbreaks moot, as it ought to be. (Individual, No Address - #A29243.30100)

**USE TECHNIQUES THAT ADHERE TO LOCAL FIRE MANAGEMENT PLANS AND THAT CONTAIN MONITORING PROVISIONS TO ASSESS THE USEFULNESS OF THE BURNS**

We support active management of roadless areas in the form of carefully designed prescribed burns that adhere to local fire management plans, and that contain monitoring provisions to assess the usefulness of the burns. (Organization, Seattle, WA - #A21694.30100)

**1538. Public Concern: The Forest Service should carry out controlled burns.****TO MANAGE FOREST HEALTH**

Insect outbreaks are part of a natural cycle in many forest systems. In systems where natural fire regimes are still operating, low to moderate intensity fire can itself help prevent or lessen the impact of insect outbreaks. By reducing the number of younger trees, thereby decreasing drought stress, some forest communities can both reduce catastrophic fires and the frequency and severity of insect infestations. Using controlled fire and developing appropriate let-burn policies for roadless areas should be the preferred ways to manage for forest health. (Individual, Seattle, WA - #A11805.31200)

**IN STRIPS OF FOREST THAT HAVE PREVIOUSLY BEEN HARVESTED, SIMILAR TO A CROP ROTATION MANAGEMENT ACTIVITY**

During this summer's season of wildfires, there is talk of controlled burns to burn up years' worth of accumulated brush and wood fuels which make massive wildfires more likely. Given that fighting these massive wildfires is very expensive, why not compromise with controlled burns in strips that have first been logged, giving the loggers the job of gathering unwanted fuels in piles to burn in lieu of buying the timber. These strips then become firebreaks against future wildfires. As these strips regenerate, other strips can be similarly harvested, etc. such that over time a healthy forest results somewhat like the beneficial effects of crop rotation on a farm. This is just one idea. There must be many sensible formulas such that man, with roads, can save the forests. Man can best protect the forest environment through involvement, not deliberate neglect. (Individual, Leamington, UT - #A8030.30531)

**IN AREAS WHERE FIRES HAVE BEEN ARTIFICIALLY SUPPRESSED**

Protecting forests means allowing fire to work its natural role. Controlled burns should be planned where fires have been artificially suppressed. (Individual, Seattle, WA - #A17999.30310)

**IN AREAS WHERE THE RISK FOR EXTREME TEMPERATURES AND INTENSIVE VOLUMES OF SMOKE HAVE BEEN ADDRESSED**

In the case of forests, we have been waging a divisive discussion for many years between philosophies of fighting fire [or "lighting fire"]. Reduction of fuels is a must. Start with the least invasive tools first, and proceed to controlled burning when the risk for extreme temperatures and intensive volumes of smoke have been addressed. (Individual, Elko, NV - #A23651.30500)

**WHERE POSSIBLE, OTHERWISE THIN TIMBER WITHOUT BUILDING NEW ROADS**

As [is] pretty generally known, most forest areas in the western USA (some coastal forests being a partial exception) have naturally coexisted with low-intensity fire for millennia. Fire has controlled fuel buildup, moderated insect and disease problems, etc. Fire control over the last century has created fuel buildups, and encouraged insect and disease problems. Where possible, the obvious solution is the use of intelligent "controlled burning". Where this is, for whatever reason (such as proximity to roadless area borders) not possible, mechanical thinning should only be considered if it can be done without the building of roads, and in a way which replicates as nearly as possible the effect of low intensity fire (e.g., preserving larger trees, recycling nutrients). I believe the rules under suspension are quite consistent with these principles. (Individual, Seattle, WA - #A17261.30400)

Protecting Forests: Controlled burns and other management approaches can be executed without the building of new roads into existing roadless areas. (Individual, No Address - #A26689.30100)

**1539. Public Concern: The Forest Service should construct firebreaks.**

Adequate "Fire Breaks" should be established to ensure the fires can be contained in a reasonable area. (Individual, Tucson, AZ - #A4540.30400)

**ONLY IF REALLY NECESSARY**

I support a roadless policy that allows for fire lanes to be dug *if necessary only* - that is, if winds and drought/weather conditions suggest that fire left uncontrolled will spread to populated or popular recreational regions. The Forest Service should determine necessity realistically - will throwing out a shovel brigade really stop this blaze, or is the act one of futility? (Individual, West Yellowstone, MT - #A1045.30600)

**BY USING ROADS AS FIREBREAKS**

Roads are important fire breaks. They allow fires to burn out rather than consume an area. They allow us to fight the fire if called for. (Individual, No Address - #A6738.30540)

**BY DECOMMISSIONING SOME ROADS AND MANAGING THE REMAINING AS A DEFENSIBLE PERIMETER AGAINST WILDLAND FIRE**

The existing road system is expensive and unsustainable. The process should consider which roads can be decommissioned, and how to manage the remaining roads as a defensible perimeter against wildland fire. Pulpwood thinning of the settled areas near remaining roaded areas is the best way to restore ecological processes which naturally limit fire hazard. (Individual, No Address - #A4777.30500)

**BY CLEARING DEAD TIMBER AND THINNING STANDS NEXT TO PRIVATE PROPERTY TO AN APPROPRIATE WIDTH**

I have a suggestion only on the problem of wildfires and fires started outside the National Forest. I grew up right after WW II in a small village in the Black Forest of Germany. When I was 5, my mother took me into the forest and we made bundles of branches for kindling. We were not alone. Everybody did it. The forest floor was clean, no dead wood, like the immediate surroundings of a popular camping place in the woods here in this country. My suggestion is to clear dead wood and thin the stand of forest next to communities and private property to a depth that will constitute an effective fire break. You should employ for that task the many unemployed loggers and others that typically are found around the Klamath National Forest. (Individual, No Address - #A5286.30500)

**BY CREATING A BOUNDARY AROUND ROADLESS AREAS WITH MULTIPLE USE, MOTORIZED TRAILS**

Inventoried roadless areas are subject to the greatest threat of wildfires and insect and disease outbreaks due to their limited accessibility. I would suggest that all such areas are boundaryed by multiple use, motorized trails. This would create a firebreak immediately, and also allow for easier access to keep an eye on the health of the forest. As far as the buildup of hazardous fuels, allow citizens to collect firewood from these established border trails to further promote the cleanup of the fuels and help to maintain the firebreaks. (Organization, No Address - #A26800.30100)

**BY MAINTAINING FIRE LANES BUT CLOSING THEM TO ALL BUT FOOT TRAFFIC**

I believe fire lanes must be available and maintained but closed to all but foot traffic. (Individual, Stewartstown, PA - #A7563.90110)

**BY ENCOURAGING VOLUNTEERS TO ASSIST WITH FIRE BREAK MAINTENANCE**

Not the least of these effects is that wildfires are fought with much lowered effectiveness without proper access for fire crews. Clearly, the Forest Service does not have the resources to maintain millions of miles of firebreaks if the support of recreational users is denied. Roads SAVE wilderness!! (Individual, Ypsilanti, MI - #A9112.30200)

**OUTSIDE OF ROADLESS AREAS**

If firebreaks are required, they should be constructed outside the roadless areas. (Individual, No Address - #A30493.30540)

**1540. Public Concern: The Forest Service should allow ski areas located on the fringes of roadless areas to help provide defense zones.**

**WHICH ALLOW FOR DEVELOPMENT WHILE DECREASING FUEL LOADS**

It is the local Forest supervisor who is in charge of protecting the particular forest. Activities and planning actions must therefore occur at the local level. There are several management practices that would provide for healthy forests, especially related to the buildup of hazardous fuels and the occurrence of severe wildfires. One such technique is to allow the ski areas located on the fringes of roadless areas to help provide defense zones that allow for development while decreasing the fuel loads. The vegetative treatments in the ski areas have created a defendable space resulting in interruption of fire spread and reduction of fire intensity. (Permit Holder, Mammoth Lakes, CA - #A21901.12125)

**1541. Public Concern: The Forest Service should maintain existing fire trails.****IN THE SHAWNEE NATIONAL FOREST**

In Illinois in Shawnee National Forest please maintain existing fire trails also. (Individual, Decatur, IL - #A11052.30200)

**1542. Public Concern: The Forest Service should suppress forest fires.**

Protecting Forests is something you know nothing about, or the LET BURN POLICY IN YELLOWSTONE would never have been followed. First put fires out as soon as possible before they get out of control. (Individual, Ogden, UT - #A280.30320)

Forests and communities should be protected from fire by adequate access to control the fires before they reach uncontrollable size. Go back to the Smokey Bear days when all fires were controlled at the shortest possible time and small size. (Individual, Payette, ID - #A1049.30400)

We are now suffering a bad wildfire in our own back yard due to careless campers and are told by the "enviro" part-timer in our neighborhood . . . "just let it burn" . . . why, for pete sakes? What good does it do to lose thousands of dollars worth of inventory (lumber) and food for animals (deer, bear, and whatever and even mice!) and maybe giving our neighbor, Canada, the world's biggest forest fire? How many lost head of livestock and human lives do you "work into your 'let it burn' agenda before you see reality?" People pay fees to graze livestock and that is lost revenue, also. (Individual, Mazama, WA - #A757.30430)

Obviously "roadless areas" prevent any detection or possible abatement of fuel buildup, insect or disease outbreaks and severe wildfires. Wildfires should not be considered a "natural" remedy for any of the above. The temperatures at which they burn sterilize huge amounts of otherwise productive and scenic land to say nothing of the absorption of carbon monoxide and production of oxygen. Once these lands are destroyed by fire, the very necessity of human life is extinguished with the fire. (Individual, Three Forks, MT - #A697.30200)

**BECAUSE LETTING FORESTS BURN IS NOT RESPONSIBLE LAND MANAGEMENT**

Allowing millions of acres to burn is not "responsible" environmentalism because:

1. The smoke pollutes the air
2. With winter snow and rain, streams become polluted because of soil erosion
3. Wildlife is displaced or killed
4. Much timber is ruined even for salvage logging. (Individual, Rocklin, CA - #A6215.30100)

**BY USING CHEMICALS TO EXTINGUISH FIRES**

Carbon dioxide as in the case of Nevada and other states can even cause fires. Lightning storms, especially dry lightning can tear a forest up real quick. Yet in many areas we're prevented from utilizing chemicals to extinguish fires, as if the smoke the fire creates is more environmentally friendly. (Individual, Jefferson, OR - #A775.30400)

**BY ALLOWING FIRES TO BURN TO A CERTAIN LANDSCAPE FEATURE BEFORE SUPPRESSING THEM**

A century of fire suppression has made roadless (and other) forests unhealthy. Enormous fuels have accumulated. The Forest Service should consider procedures used in some national parks of fire management that allows fires up to a certain point - a drainage, to a ridge, etc., before suppression. Fire plans in roadless areas should be designed to reintroduce a natural mosaic of different stand age classes across the landscape as the prime objective, rather than mere suppression. (Individual, Lolo, MT - #A111.30400)

**BY ENLISTING MILITARY AIRCRAFT CONVERTED INTO WATER TANKERS AS A SUPPRESSION TOOL**

To help minimize the destruction of State and Federal Forests due to wildfires, I propose the following solution. Re-activate a wing of the now decommissioned B-52s, converting them into water tankers that would be strategically stationed in airstrips across the United States. These planes and their water would be available to any State or Federal forest fire in the country on a moment's notice. The United States Armed Forces or each individual State's National Guard could man the planes. The "bombing runs" or water drops would simulate combat conditions for the pilots. Minimizing the loss of grasslands and forests and giving our military personnel much needed experience, under less than ideal conditions. (Individual, Kamiah, ID - #A5419.30400)

How many cargo planes does the US armed services have? Many. What if a water tank were made for 9,000 of them? Some could even take on water by skimming the great lakes, oceans, etc. What if 9,000 cargo planes, 1 mile apart, dumped oceans of water on a wildfire, first light until dark, dark until first light. Non stop. Non stop. I say the blasted fire would be put out!!! Then they could put out the other one and all of them fast. (Individual, Jackson, MI - #A7273.30400)

**1543. Public Concern: The Forest Service should concentrate firefighting efforts in urban-forest interface areas.****BECAUSE THESE AREAS ARE ALREADY ROADED AND POSE THE GREATEST THREAT TO LIFE AND PERSONAL PROPERTY**

Wild fires are much more likely to start in areas with roads, due to increased public access. The highest risk of wildfires is in the urban interface, where homes and private property run a high-risk of destruction. Incidentally, in the state of Washington, a spark from a vehicle engine in a roaded, logging induced, fuel-heavy forest, caused one of the two most devastating fires in recent times. The Forest Service should concentrate its fire fighting efforts in those areas, which are already well supplied with roads and pose the greatest threat to life and personal property. (Organization, Seattle, WA - #A21702.30200)

The agency should make clear that access to roadless areas to prevent or address forest fires, fuels buildup, insect or disease outbreaks or other urgent priorities will require management flexibility and that exceptions to a roadbuilding ban are needed for such access. More intensive forest fire prevention activities should be allowed in roadless areas near or adjacent to urban interfaces, private lands or other public lands, such as ski areas, where there has been extensive investment of private capital in improvements that could be threatened by severe wildfires. Any national directives on roadless area management should contain an explicit exemption for activities in roadless areas needed to prevent or address forest fires, fuels buildup, insect or disease outbreaks, or other safety issues. (Permit Holder, Denver, CO - #A15385.30200)

**1544. Public Concern: The Forest Service should enlist prisoners to clean up dead and dying timber and brush and to construct and maintain trails.****MATERIALS COLLECTED COULD BE USED TO OPERATE A CO-GENERATION POWER PLANT**

We expect our military personnel to live in whatever kind of conditions that the situation requires. Yet, we let our national criminals live in better conditions and with more benefits than our military and most of the civilian population of the United States. With that in mind, why couldn't we take the majority of our able-bodied State and Federal nonviolent offenders and place them in a so called "CCC" camp. Whose responsibility it would be to go through, literally picking and cleaning up all of the dead and dying combustible material, from all of our State and Federal lands. However, this "CCC" camp would also include the responsibilities of building and maintaining the forest trails for everyone's enjoyment. They would live in conditions that were no worse than those that we expect our military men and women to live in without complaint.

This combustible material could then be used as fuel in a Co-Generation power plant. This would help to alleviate the present and future energy shortages of the United States of America. With the available

technology, the emissions of the Co-Generation power plant would be minimal, eliminating any environmental concerns. (Individual, Kamiah, ID - #A5419.30500)

I think that prisoners from state pens should be utilized to clean out underbrush, so that the forest fires would be less. (Individual, Harrisonburg, OR - #A19453.30600)

**1545. Public Concern: The Forest Service should specify the criteria under which the Roadless Area Conservation Rule exceptions would apply.**

**FOR MANAGEMENT ACTIVITIES TO REDUCE THE THREAT OF WILDFIRE**

The Forest Service should make clear that under some circumstances healthy forests might be subject to wildfires, even severe ones, and build up of fuel loads. This would be an appropriate discussion in regional assessments or Analysis of Management Situation conducted as part of a Forest plan revision. The current roadless area conservation rule allows for management activities to reduce threats from wildfires. The language in the current rule allows for:

(1) The cutting, sale, or removal of generally small diameter timber is needed for one of the following purposes and will maintain or improve one or more of the roadless area characteristics as defined in #A294.11.ii. To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period.

We suggest that it is the role of Forest Plan revision to specify, to the extent possible, in which roadless areas this exception would apply and the thresholds that would trigger these management activities. It would be expected that these thresholds would be different for various units identified via GIS analysis. (Individual, Asheville, NC - #A22623.30410)

The prior Roadless Rule policy allowed for some road construction and some logging in roadless areas when faced with an imminent threat to public and health and safety, and allows hazardous fuels treatments within roadless areas. The Commission supports the reservation of this level of active management for the occasions presenting a true hazard to life or property, or risk of *catastrophic* fire. We are concerned, however, that this exception will be taken advantage of and used to allow logging and road construction for ulterior motives where risks are only slight. For this reason, exceptions must be stated narrowly and explicitly. (Executive Director, Inter-Tribal Fish Commission, Portland, OR - #A20331.30400)

***Ecosystem/Restoration Management***

**1546. Public Concern: The Forest Service should acknowledge that wildfire is a component of a healthy forest.**

Regarding the management of inventoried roadless areas to provide for healthy forests, the Forest Service should make clear that under some circumstances healthy forests might be subject to wildfires - even severe - and build up of fuel loads. This would be an appropriate discussion in regional assessments or analysis of management situation conducted as part of a Forest plan revision. (Civic Group, Roanoke, VA - #A1713.30300)

The Forest Service should try to get over its aversion to fire. It's not a disaster—it's a natural process; fire enhances habitat for deer, elk, and other wildlife recycles nutrients, etc. Many Forest Service employees know this, but the agency can't seem to avoid a knee-jerk anti-fire position. (Individual, Missoula, MT - #A90.30300)

Fire plays a vital role in western forest and rangeland ecosystems. As a natural disturbance agent responsible for recycling nutrients, regenerating plants, and sustaining diverse wildlife habitats, fire is necessary for the continued productivity of these ecosystems. Certainly, efforts should be made to

protect communities in the urban/wildland interface zone, defined as the area “where combustible homes meet combustible vegetation.” But pouring taxpayer dollars into suppressing fires and logging in roadless forests located far from residents makes little sense. (Organization, Nevada City, CA - #A4941.30300)

## **1547. Public Concern: The Forest Service should not suppress forest fires.**

### **BECAUSE NATURAL FIRE MAINTAINS DIVERSE FORESTS AND WILDLIFE HABITAT**

Five years ago, I published several studies of fire ecology of a roadless area. My findings from the Northern Rockies indicated that large roadless areas can be important for facilitating fire as a natural and important process in maintaining diverse forests and wildlife habitats. By limiting human-caused ignitions, structures and other developments, fire management can actually be less challenging in these areas. There are many other virtues of large roadless areas such as water quality, solitude, wildlife refugia, and so on. The Forest Service’s Interior Columbia Basin Assessment further stresses the ecological integrity and value of these areas. (Individual, Portland, OR - #A3912.30300)

We believe that the long-term management strategy for both fire prevention and forest health needs to incorporate a natural fire element. (Organization, Seattle, WA - #A21904.30430)

### **BECAUSE FIRE REJUVENATES ECOSYSTEMS**

Current threats to the health of our nation’s forests can almost without exception be traced to poor past management practices. The decades long effort to suppress forest fires has led directly to the “tinder box” we now face. There is however a clear and timely demonstration of the best response to naturally occurring forest fires - let them burn. The fires in Yellowstone in 1988 have led to a widespread rejuvenation of that Park’s ecosystem. (Individual, Green Valley, AZ - #A5089.30300)

### **BECAUSE NATURAL FIRE REGIMES SHOULD BE RESTORED**

Fire hazards are invariably more severe where selective logging and fire suppression have led to the buildup of a brushy understory of fire-prone species like white fir. The Forest Service should move further in the direction of restoring natural fire regimes, with less aerial suppression of fires in roadless areas, and a greater concentration on prophylactic measures within a perimeter defined by a reduced road system. (Individual, No Address - #A4777.30310)

Wildfire suppression should be similar to that already followed on wildlands in Alaska. Naturally occurring fires should be left to burn unless threatening towns. Wildfires are not a big issue in much of coastal Alaska’s forests. (Individual, Seldovia, AK - #A8803.30400)

### **BECAUSE FIREFIGHTING IS A WASTE OF MONEY, DANGEROUS, AND HARMS THE ENVIRONMENT**

Roadless areas and other designated wildernesses should be left to burn under natural conditions. Fighting fires in remote areas is a waste of money, is too dangerous, and does more harm than good to the environment. (Individual, Lehi, UT - #A568.30400)

### **BECAUSE DEAD TIMBER IS A CRITICAL PART OF THE FOREST ECOSYSTEM**

Management should be left to natural processes whenever possible. Fire management should only be done near inhabited areas, if at all. Deadwood is a critical part of the forest ecosystem, and should be allowed to exist. (Individual, Winthrop, WA - #A19642.30310)

### **EXCEPT IN THE EVENT OF INSECT OR DISEASE INFESTATION THAT IS UNCONTROLLABLE BY NATURAL MEANS**

Fire suppression should stop completely, except in the event of insect or disease infestation that is uncontrollable by natural means. (Individual, New Haven, CT - #A8987.30910)

### **EXCEPT IN THE EVENT IT IS NOT POSSIBLE TO CONTROL THE FIRE, THEN RELY ON MORE AIR-POWER**

Keep them roadless, thus avoiding some of the problems (such as fire) that are intensified by roads. Fires have been controlled in these areas in the past, and can continue to be controlled. (Most roadless-area fires should be left to burn. Where that is not possible, much heavier reliance on massive air-power than

has been practiced would greatly improve fire control.) Insect and disease outbreaks are part of the natural forest cycle and should be left alone in roadless areas. (Individual, Santa Fe, NM - #A11703.30100)

#### **EXCEPT IN THE EVENT THE FIRE IS HUMAN INDUCED**

As for fire concerns, let natural fires burn, fight human started ones. We may have some huge fires due to the history of forest mismanagement in the short run, but after awhile the forests' natural fire responsibilities will resume. (Individual, No Address - #A21323.30310)

#### **IN REMOTE AREAS**

The FS needs to develop fire plans right away for roadless areas which will allow most wildfires to burn when not threatening human lives or property. Suppressing wildfires in remote areas is ridiculous, expensive, and counter productive. (Individual, Idaho Falls, ID - #A27528.30400)

The vast majority of roadless areas are in inaccessible areas, mostly at higher elevations. These forests do not need to be protected from wildfire. Higher elevation forests usually have stand-replacement fire regimes. These are typified by "severe" wildfires that occur every century or more. Fire suppression has not been occurring for long enough to result in any kind of "unnatural" fuel buildup in these forests. There is no reason to be fighting fires in these areas, and there is no evidence that either roads or silvicultural thinning would help us fight fires there if we wanted to do so. Nor do forests need to be protected from insect outbreaks, as these are also natural occurrences. The best way to protect forest health in roadless areas is to prevent the construction of roads. Roads have profound negative impacts on wild lands. They fragment habitats, cause erosion, and rapidly promote the spread of invasive weeds. (Professional Society, Missoula, MT - #A29308.30100)

The Roadless Rule already provides exceptions that allow road building and logging when needed to address wildfire concerns. Because roadless areas are typically located far from communities and residences, wildfires in roadless areas pose relatively little risk. This is especially true in Alaska's two national forests. (Organization, Sitka, AK - #A30486.30100)

The greatest fuel loading and fire hazard areas and areas closest to homes should get highest priority. Roadless areas are often the furthest from residences (since there are no roads in these areas). There is already a Forest Service program to let fire burn in wilderness when private property and commercial timber outside of those areas is not threatened, since it is part of the natural ecological process. Since larger trees in areas of frequent fire are often fire resistant and will survive, since these areas are furthest from civilization, they are at higher elevations, they have colder temperatures and higher humidity, fuels are not so dry, fires often do not get so large and burn themselves out more quickly, and smoke is not such a public health concern in these locations. It is more difficult and expensive to fight fire in roadless areas (no roads, further from towns, supplies, etc.). (Individual, Olympia, WA - #A20849.30400)

#### **IN WILDERNESS AREAS**

Wilderness (and not merely wilderness already contained in designated wilderness areas), however, should be allowed to burn naturally as much as possible. (Individual, Seattle, WA - #A26276.30310)

#### **PROHIBIT FIREBREAKS AND RETARDANT DUMPING**

National fires need to be allowed in Roadless wilderness without damaging fire breaks bulldozed and retardant dumping. (Individual, Talent, OR - #A23553.30300)

### **1548. Public Concern: The Forest Service should reintroduce fire into forest ecosystems.**

The most effective fuels treatment that would both protect roadless areas from future severe fires, insect and disease outbreaks while at the same time it restores areas altered by past fire exclusion would be a program of prescribed burning and wildland fire use. Fire reintroduction has been the longstanding call among scientists, ecologists, and conservationists. It is the most ecologically beneficial and least

economically costly management treatment to manage roadless areas. It is fully in accordance with the letter and spirit of the National Fire Plan, the USFS Cohesive Strategy, the 1995 Federal Wildland Fire Management Policy, and the 2001 Review and Update of the Federal Wildland Fire Management Policy. In most cases on most roadless areas, careful fire management planning can devise the prescriptions necessary to apply both prescribed and wildland fire use for all needed fuels treatments. In contrast to road-dependent mechanical thinning treatments, roads are unnecessary for prescribed burning or wildland fire use. The economics of fire-based fuels management would thus be even more attractive since the costs of constructing and maintaining roads are moot. To burn or not to burn is really not an issue dependent on more research or policy reform—it is mainly a matter of Forest Service managers harnessing the will to make the right decisions regarding wildland fire use and prescribed burning. (Organization, Eugene, OR - #A21798.30200)

Some Roadless Wilderness areas need to have fire reintroduced gradually if the past fire suppression has created inferno type conditions, low intensity burns could be encouraged. All with proper study of the growing field of fire ecology. (Individual, Talent, OR - #A23553.30300)

Rely Principally on the Reintroduction of Fire. What has been missing from these systems is fire. Fire should be introduced through liberal application of controlled burns, and with a reduction in the suppression of natural fires. Even at that, it will take years to catch up with the backlog of built-up fuels. Meanwhile, catastrophic fires will occur. Well, let's face it. Some areas have always burned catastrophically. For the next few decades, until the built-up extra fuels are reduced, more areas than usual will burn catastrophically. In the end, this is a natural cure for an unnatural situation. Except for fires that threaten to consume a disproportionate amount of the available forest (see below), even catastrophic fires should be allowed to burn without fire suppression. In the end we will get a natural system again - free from the residue of past mismanagement. What this approach requires, of course, is humility and patience - two attributes rarely demonstrated in our national character. (Individual, Pendleton, OR - #A30482.30300)

### **1549. Public Concern: The Forest Service should manage fire in roadless areas following wilderness fire management policies.**

#### **BY EXTENDING THE "LET BURN" POLICY TO ROADLESS AREAS**

The idea that areas established for the purpose of maintaining them in a natural condition need to be managed to protect them from natural disturbance is, with a few exceptions, misguided and unjustifiable. Protection of roadless areas is not expected to increase either the number of large fires or the acreage burned over the next 20 years. The majority of lightning-caused fires, and the great majority of human-caused fires, occur outside of wilderness and roadless areas (FEIS, table 3-20, 3-21), and the median size of large fires is not appreciably different between inventoried roadless and roaded areas (FEIS, Table 3-22). Where feasible, fire management in roadless areas should follow wilderness fire management policies. Where "let-burn" policies are in place they should be extended to roadless areas. Aggressive fire suppression (including use of ground-based mechanized equipment) should be undertaken only when fires threaten life or property outside of roadless area boundaries.

Prescribed burning to simulate natural fire regimes (including low-impact actions to reduce fuel loading) should be allowed in roadless areas. Use of mechanized equipment for fuel suppression requiring the construction of temporary roads for access should not be allowed. More intensive proactive steps to reduce fuel loading and fire risk (including mechanized or commercial thinning) should focus on areas where there is the highest threat to human settlements and property (the wildland-urban interface). Most of these areas will be well outside inventoried roadless areas (FEIS, pg. 3-87), and their treatment is likely to occupy forest managers for several decades. Where roadless areas are in close proximity to settled areas exceptions may be made that allow more active fire risk reduction steps in roadless areas.

No actions should be taken in roadless areas to suppress natural insects, diseases or other pests. Exceptions may be made to control outbreaks of exotic pests that are not well-established in the region, and where treatment may reasonably be expected to limit the establishment of these pests. However, these instances are likely to be relatively rare. (Organization, Boston, MA - #A23083.30100)

**1550. Public Concern: The Forest Service should ban the use of fire in roadless areas.**

Protecting forests from fire is not totally possible, bans on fire use in these roadless forest is one way to go. Anyone caught building a fire is to be fined excessively. (Individual, Boulder, CO - #A3478.30400)

**1551. Public Concern: The Forest Service should avoid artificial fires, backburning, and prescribed burning.**

We should use hand clearing and avoid artificial fires and backburning which has repeatedly gotten out of control and done more damage than good. Dead and diseased trees should be removed when necessary and non invasive methods such as horse logging should be employed when possible. (Individual, Marion, NC - #A4691.30400)

Most of the forested area that burned in 2000 was managed timberland - areas that have been logged or thinned in the past - not pristine old growth or roadless wildlands! Fight fires, end prescribed burns! (Individual, Bozeman, MT - #A8444.30100)

The forest health problem cannot be ignored. Prescribed fire to reduce fuel is not a feasible program for portions of the forest which are accessible by roads; and it certainly is even less feasible in roadless areas. In the first place, prescribed fire fails to accomplish significant fuel reduction most of the time. In the second place, the federal agencies have a miserable record in controlling prescribed fire. And in the third place prescribed fire is unacceptable because of its unreasonable cost when weighed against benefit. These problems plume the smoke and its disastrous affect on human health and air quality make massive prescribed fire programs unacceptable. (Individual, Townsend, MT - #A20588.30420)

Protecting forests the same protection or even more should be provided roadless areas for they are middle ground on the forest system; highest being wilderness; second being roadless and third being open access. Whatever actions needed to protect the areas should be taken; even if it seems to violate the rules for roadless areas; ex: if a road on fire break needs to be bulldozed to fight a fire or provide for spraying or harvest of diseased tress; it should be done, better to destroy a few than let the whole area be decimated. I am totally against LET BURN and CONTROLLED-BURN policies. (Individual, Ogden, UT - #A2288.30100)

**BECAUSE FORESTS IN THE SOUTHEASTERN UNITED STATES DO NOT HAVE A FUEL LOAD**

The Forest Service needs to move beyond the idea that fires are bad and evil. Yes, fires are bad when they endanger lives and communities. But some fires should be allowed to burn and some forest ecosystems depend on fire to regenerate. On the other hand, the cove forests in the southeastern United States are moist forests and have a very low risk for fire. The southeastern forests don't have a "fuel load"; we have leaf litter and the leaf litter helps keep the soil moist. The moisture in our forests is what makes them so diverse. I am very discouraged to see the Forest Service doing prescription burns in the Pisgah and Cherokee National Forests. These forests are not dependant on fire. The only reason the Forest Service is burning is to reduce competition of hardwood understory trees, like non-commercial value Dogwoods. We need to spend tax-dollars to reduce the threat of wildfire in and around homes, not miles away from communities in roadless areas. (Individual, Asheville, NC - #A30306.30300)

**1552. Public Concern: The Forest Service should protect roadless and roaded areas.**

**BY DESIGNING RESTORATION PROJECTS TO MANAGE POTENTIAL CATASTROPHIC WILDFIRES**

On the Pike and San Isabel, several areas which have fire-suppressed forests in the wild-urban interface are being considered for restoration projects which would specifically deal with potential catastrophic wildfire. These projects can be designed to protect roadless and roaded areas alike within the parameters of the Rule. (Organization, Denver, CO - #A8824.30100)

### **1553. Public Concern: The Forest Service should allow a categorical exemption for restoring burned areas.**

#### **INCLUDING NEEDED ROAD BUILDING, SALVAGE LOGGING, SOIL PREPARATION, SEEDING, PLANTING, RIPARIAN RESTORATION, AND FOLLOW UP WORK TO HELP THE SURVIVAL OF SEEDLINGS**

With fires burning in the West, and hundreds of thousands of acres needing restoration in the aftermath, one could hope for a change of public sentiment to allow for: A categorical exemption from legal challenges to needed restoration of burned over areas, including but not limited to needed road building, salvage logging, soil preparation, seeding, planting, riparian restoration, and follow up work to help the survival of seedlings. (Individual, Yreka, CA - #A17133.31100)

### *Other*

### **1554. Public Concern: The Forest Service should utilize burned timber as biomass energy.**

Burned timber must be utilized as Biomass energy rather than laying waste other than set aside amount of downed trees for habitat. (Individual, Jefferson, OR - #A775.31100)

## **Insects, Disease, and Noxious Plants**

### **Summary**

**General Comments** – A number of respondents comment about insects, disease, and noxious plants. One individual urges the Forest Service not to weaken the Roadless Area Conservation Rule because the Rule, this person states, will aid federal, state, and local efforts to combat the spread of noxious weeds. Likewise an organization states that “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.” One business suggests that the Forest Service should implement standards for insect and disease control “so that an outbreak is controlled and potential usable losses are utilized before they become unsuitable;” and an association requests that the Forest Service recognize that roadless area transportation regulations and policies interfere with local grazing associations’ work in controlling noxious plants.

**Adequacy of Analysis** – Some respondents suggest that the Forest Service should evaluate the role of insects and disease in a forest ecosystem. Others recommend insect and disease outbreaks be examined—on foot, on horseback, with the use of aircraft, with regular surveys, by enlisting aid from the public, or by establishing an entomological collection station. Several respondents suggest that the Forest Service evaluate all sources that contribute to the noxious plant problem, including roads, people, equestrians, wildlife, and natural processes. A county agency asks that the Forest Service reevaluate insect and disease risk. This agency states, “We suggest that this issue be reevaluated and specific direction be incorporated as to insect and disease response within the unroaded and roadless areas.” Additionally, one individual suggests the Forest Service expand its studies of ecosystem interactions because few places are in danger of insect and disease epidemics.

**Funding** – Several people suggest that funding be directed to the management of insects, disease, and noxious plants. One individual states, “Funding should increase for research and development of biological means of preventing and controlling insects and disease.” Another person recommends that the Forest Service reallocate money earmarked for timber removal in order to hire a staff large enough to recognize forest health problems early on. Finally, an

organization asks the Agency to acknowledge the financial contributions made by off-road vehicle users to noxious plant abatement programs.

**Management** – A number of respondents assert that the Forest Service should actively manage resources to control insects, diseases, and noxious plants. Suggestions include reintroducing fire, prohibiting monocultures, using chemicals and other solutions, using aerial applications, and implementing and enforcing U.S. Department of Agriculture recommended initiatives. A federal agency suggests the Forest Service concentrate its efforts in roaded areas identified as suitable for logging.

Other people urge the Forest Service to acknowledge that insects and disease are a component of a healthy ecosystem and that they play a vital role in biodiversity and nutrient recycling. Some suggest the Forest Service should control insects, disease, and noxious plants with natural remedies like species diversity and natural predators. Others state that wildfires should be allowed to destroy insects and disease. Several individuals recommend that pesticides and herbicides should not be used.

A number of respondents urge the Forest Service to only control exotic or non-native insects and diseases. According to one person, “Disease and insect outbreaks of natural origin should be allowed to run their course. More active management may be needed if the pathogens or insects are exotic species brought in by man.” Additionally, several people say that the Forest Service should not use forest health as an excuse to harvest timber because it is not needed to prevent insects and disease and because insects and disease rarely rise to epidemic levels.

### *Insects, Disease, and Noxious Plants General*

#### **1555. Public Concern: The Forest Service should not weaken the Roadless Area Conservation Rule.**

##### **BECAUSE THE RULE WILL AID FEDERAL, STATE, AND LOCAL EFFORTS TO COMBAT THE SPREAD OF NOXIOUS WEEDS**

In forest ecosystems, most noxious weeds are restricted to sites near roads, logging operations and other disturbed sites such as power line corridors. It is clear that weakening the Roadless Area policy will directly counter Federal, state, and local efforts to combat the spread of noxious weeds. This will not only threaten and damage native biodiversity and ecosystem processes, but will also result in the need for expensive and controversial weed eradication measures in areas that do not currently contain roads and logging activity. Thus the consequences of weakening the Roadless policy from its current version will be both environmentally and economically harmful to our public lands and the taxpayers who support their proper stewardship. (Individual, Davis, CA - #A5401.31300)

#### **1556. Public Concern: The Forest Service should ensure that its policies support rather than hinder the campaign to minimize damage caused by invasive exotic plants.**

Current efforts are not adequate to control these invaders [exotic and invasive plants]. The Forest Service spends approximately \$5 million annually on invasive plant control, yet this funds control efforts on only 100,000 of the more than 6 million acres invaded by exotic plants. It is hardly surprising that noxious weeds continue to spread across our western public lands at a rate estimated at 4,600 acres per day—that is, they cover a new area the size of Delaware every year. Again, this figure is surely an underestimate because it doesn't include many of the species invading our forests and grasslands.

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 that 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, all terrain vehicle (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.

Finally, weeds are spread from centers of infection by wildlife, wind, and water. These centers are often established by 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*. (Organization, Missoula, MT - #A17234.31320)

**1557. Public Concern: The Forest Service should implement standards for insect and disease control.**

**AS PART OF THE FOREST PLANNING PROCESS**

Standards for insect and disease control should be a part of forest planning so that an outbreak is controlled and potential usable losses are utilized before they become unsuitable. (Business, Eureka, MT - #A17220.31220)

**1558. Public Concern: The Forest Service should consider that roadless area and transportation regulations and policies interfere with local grazing associations’ work in controlling noxious weeds.**

**WHICH ARE A PERSISTENT PROBLEM ON THE NATIONAL GRASSLANDS**

The roadless and transportation regulations and policies also interfere with local grazing associations’ work in controlling noxious weeds, which are a persistent problem on the National Grasslands. The transportation and OHV policies will directly prohibit cross-country access for this work, again more evidence that the Forest Service has failed to assess the cumulative impacts on other programs. (Organization, Denver, CO - #A21358.31300)

**1559. Public Concern: The Forest Service should not require horses to be diapered.**

**BECAUSE DEER AND ELK ALSO SPREAD SEEDS IN THE FOREST**

Diapering horses is a really stupid idea as they do no more spreading seeds than deer or elk that eat hay out of the farmer’s field and transport seeds back to the forest. Generally the seeds in the farmer’s field are far less troublesome than the ones already on the forest. (Individual, Oak City, UT - #A40530.31313)

*Adequacy of Analysis*

**1560. Public Concern: The Forest Service should evaluate the role of insects and disease in a forest ecosystem.**

*How should inventoried roadless areas be managed to provide for healthy forests, including protection from severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreaks?*

The role of insects and diseases in a forest ecosystem should [be] included [as] an assessment conducted in the early stages of plan revision or included as part of the Analysis of Management Situation of a revised plan. (Civic Group, Roanoke, VA - #A1713.31210)

## **1561. Public Concern: The Forest Service should examine insect and disease outbreaks.**

### **BY ENLISTING THE AID OF HIKERS/VOLUNTEERS TO MONITOR AND REPORT OUTBREAKS**

As part of a philosophy to encourage Americans to exercise and see their magnificent country, could we not support a modicum of trail building and enlist the aid of hikers/volunteers to monitor and report insect/disease outbreaks? (Individual, Craig, AK - #A778.31220)

It is my belief that the management of the "12 Mile Canyon" habitat has been an example of great management of federal lands. The roadless areas here are grazed by the deer, elk, and cattle of the local herds. Build up of hazardous fuel levels is rare due to this grazing.

The use of horse back rangers, herders, and local people well educated to the needs of the forest could detect early infestations and bring the need for management changes to the local board's attention. Under these conditions the need for controlled burns would be minimized and the proper utilization of the land to maintain herds of wild animals, and summer feed for the local cattle optimized.

In the past unilateral decisions made by government employees to limit the grazing of local cattle whose owners have purchased very expensive permits for that grazing, and then been denied the use of those permits, has been a very bad area of contention and frustration among local citizens. This is especially true when the deer and Elk herds are allowed to multiply to the point of overrunning the ability of the hunters and the predators to keep the herds in balance. (Individual, Gunnison, UT - #A25755.30560)

The detection and prevention of insect and disease outbreaks can be discovered by scouting parties. Me along with many of my fellow colleagues would love to work as a scout for the summer. This would be a great way for college kids to get experience in the field as ecologists or biologists.

Once an infestation is found the use of controlled burns or pesticides could be applied. Controlled burns could be used by scouts and pesticides could be applied by plane or helicopter. Both possibilities do not need roads to be carried out. (Individual, No Address - #A17702.31200)

### **BY EXAMINING OUTBREAKS ON FOOT, HORSEBACK, OR WITH THE USE OF AIRCRAFT**

Walking is an essential part of a Forest Service ranger's duties. Examination of deadwood and underbrush accumulation, and detection of "insect and disease outbreaks" can be done on foot. Controlled burning, where deemed necessary, could be given approval under emergency protocols and accomplished by pedestrian personnel. Infestations could be controlled by crop dusting airplanes, and all activities outside areas under Wilderness designation could be supported by helicopter. (Individual, No Address - #A117.30600)

Disease detection and prevention might also be undertaken on foot or horseback and with the use of airplanes and helicopters. (Individual, Klamath Falls, OR - #A5118.30100)

In the case of detecting insect and disease outbreaks, I suggest the forest service continue its current preferred practice of aerial observation. (Individual, Clayton, GA - #A15320.30100)

Dead and diseased timber must be removed to prevent the buildup of potentially deadly fuel. The best way to discover insect-infested and diseased timber is to send Forest Service rangers into the field to look for insect-infested and diseased timber. This use of personnel can also help with enforcement issues and increase visitor contacts. (Individual, Fort Collins, CO - #A20609.30550)

**BY ESTABLISHING AN ENTOMOLOGICAL COLLECTION STATION AT THE BORDERS OF NATIONAL FOREST SYSTEM LANDS**

Entomological collection stations should be established at the borders of FS lands to detect in-flux of harmful insect vectors, or other forest disease transmission vehicles. Reduction of “natural event” fires should be limited to certain wilderness areas which directly impact populated areas and should be restricted to techniques which do not require construction of roads. Impact analysis of development of such areas should be included in all environmental assessments for new projects. Natural “burns” are part of the natural cycles of events. If forests are allowed to fully develop and mature, natural fires will be largely limited to the forest understory and will be self limiting. (Individual, Stone Mountain, GA - #A19230.30100)

**WITH REGULAR SURVEYS**

Of course regular surveys to detect insect and disease are a must. But I think this is being done now. The problem is that there has not been prompt action when outbreaks occur. This is generally due to obstructionists’ actions and lawsuits. (Individual, Portland, OR - #A28106.30100)

**AND THEN ACT ACCORDINGLY**

Regarding insects and disease outbreaks, carefully study the cause and then act appropriately such as removing climax tree species, planting/encouraging seral tree species and perhaps planting resistant tree species. (Individual, Coeur d’Alene, ID - #A4798.31220)

**1562. Public Concern: The Forest Service should fairly evaluate all sources that contribute to the noxious plant problem.****INCLUDING HIKERS, MOUNTAIN BIKERS, EQUESTRIANS, WILDLIFE, AND NATURAL PROCESSES**

Motorized recreation is not the only contributor to the noxious weed problem. In fact, the mechanisms for transport of noxious weeds is greater for other visitors including hikers, equestrians, and visitors with llamas than it is for motorized recreationists. These transport mechanisms include hair, fur, manure, shoes, and fabrics. The smooth metal and plastic surfaces on motorized machinery do not have a surface texture that will pick up and hold noxious weed seeds. Additionally, motorized recreationists practice the “Wash your Steeds” policy. However, restrictions for concerns associated with noxious weeds are only placed on motorized recreationists.

The document must make a fair evaluation of all sources that contribute to the noxious weed problem including hikers, mountain bikers, and equestrians. The document must also fairly evaluate how natural processes and wildlife spread noxious weeds. The environmental document must include a balanced discussion of the noxious weed problem. The discussions, decisions and measures used to mitigate noxious weeds should be applied impartially to all visitors. (Organization, Helena, MT - #A13226.31313)

Weeds are spread from centers of infection by wildlife, wind, and water. These centers are often established by 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, road building is directly linked to damaging infestations; the most prominent example is Port-Orford-cedar root disease, caused by *Phytophthora lateralis*. (Organization, Portland, OR - #A12004.30100)

**INCLUDING ROADS**

Roads are also the vector for noxious weeds to invade wildlands. Roads act in two ways to encourage the spread of invasive species. One way is simply easy movement of seeds into intact systems via cars and people. The road itself is a disturbance to the system which facilitates the germination of several weed species. Finally, since roads are impenetrable to water, it tends to run off to the side of the road creating a gradient of water availability from the road. Invasive species which normally would not survive in various conditions are able to thrive along roadsides due to the increase in water. These invasive species may also contribute to the fuel load, increasing the threat of wildfires in roaded areas. (Individual, San Francisco, CA - #A7044.31310)

**1563. Public Concern: The Forest Service should reevaluate insect and disease risk.**

**AND INCORPORATE SPECIFIC DIRECTION FOR INSECT AND DISEASE RESPONSE WITHIN THE UNROADED AND ROADLESS AREAS**

As with the increased risk of fire, the DEIS (3-12) acknowledges that insect infestation and disease will continue to be a problem on the roadless and unroaded areas. While the DEIS indicates this risk is particularly high on 7 Million acres of inventoried roadless areas, based on our knowledge of the local roadless and unroaded areas it is our opinion that this value is significantly understated. We suggest that this issue be reevaluated and specific direction be incorporated as to insect and disease response within the unroaded and roadless areas. (County Attorney, Grant County, OR - #A17667.30100)

**1564. Public Concern: The Forest Service should expand its studies of ecosystem interactions.**

**BECAUSE FEW AREAS ARE IN DANGER FROM INSECTS AND DISEASE**

In addition, few roadless areas are under serious danger from insects and disease. Many insects and disease are a natural part of the forest ecosystem. The forest service should continue and expand its studies of ecosystem interactions. (Individual, Greensboro, FL - #A18256.30100)

*Funding*

**1565. Public Concern: The Forest Service should direct its funding to the management of disease, insects, and noxious plants.**

Management of roadless areas should be done in concert with the natural order—natural wildfires, for instance, burn off much of the “hazardous fuels” (i.e., forest detritus), and should be monitored, but otherwise left alone. Most of the department’s funding should go towards the management of diseases, which are often not so “natural” in regards to their origins in relation to the forest. Also, climate changes are shifting advantages to various blights not seen before, as well as influencing insect populations. These must be controlled. (Individual, Anchorage, AK - #A518.30100)

Current efforts are not adequate to control these invaders. The Forest Service spends approximately \$5 million annually on invasive plant control, yet this funds control efforts on only 100,000 of the more than 6 million acres invaded by exotic plants. It is hardly surprising that noxious weeds continue to spread across our western public lands at a rate estimated at 4,600 acres per day -- that is, they cover a new area the size of Delaware every year. Again, this figure is surely an underestimate because it doesn’t include many of the species invading our forests and grasslands. (Organization, Portland, OR - #A12004.31320)

**INSECTS AND DISEASES OF LIVESTOCK AND MAMMALS**

Also, additional funding is needed to allow for the study of infestations by insects and diseases of livestock and other mammals. (Individual, Colorado Springs, CO - #A22203.30100)

**1566. Public Concern: The Forest Service should increase funding for research and development of biological means of preventing and controlling insect and disease.**

Funding should increase for research and development of biological means of preventing and controlling insect and disease. (Individual, Gallatin Gateway, MT - #A19100.31220)

**1567. Public Concern: The Forest Service should reallocate money earmarked for timber removal to hiring a staff large enough, and capable enough, of recognizing forest health problems early on.**

Insects and disease outbreaks can be detrimental to forests and their ecosystems. However, if they are caught early enough they can be treated on a smaller level. The threat is easily neutralized this way.

This is why local officials should reallocate resources currently earmarked for logging, and roadbuilding. This currently amounts to over 200 million dollars annually. The funds should be reallocated toward hiring a staff large enough, and capable enough of recognizing these problems early on.

Roads are not needed to combat these problems, they can be treated chemically, if necessary, from the air. They are also best identified by hiking through the woods, and not from the steel cage, and air-conditioned comforts of an automobile. (Individual, Walla Walla, WA - #A17698.31220)

**1568. Public Concern: The Forest Service should acknowledge the financial contribution made by off-road vehicle users to noxious plant abatement programs.**

In Montana, OHV owners as part of their vehicle registration contribute \$1.50 to a noxious weed abatement program. Non-motorized visitors do not contribute to any weed abatement program. The environmental document does not have a balanced discussion of the noxious weed problem. The discussions, decisions and measures used to mitigate noxious weeds should recognize the minor impact that OHVs have on the noxious weed problem and also credit OHV visitors for contributing to a program to control noxious weeds. (Organization, Helena, MT - #A13226.31320)

**Active Management****1569. Public Concern: The Forest Service should control insects, disease, and noxious plants.****TO REDUCE FIRE HAZARDS**

Large stands of trees all over the Black Hills are being killed by the beetles. Before we have another major fire this needs to be controlled. (Individual, Custer, SD - #A4729.30100)

**TO SAVE GAME RANGE**

The other major oversight the Kootenai and all of region 9 has been guilty of is the ignoring of knapweed for so many years. There is absolutely no justification for having hundreds of thousands of acres of game range destroyed by this and other pests. (Individual, Libby, MT - #A8286.31300)

**BY PRESCRIBING AND IMPLEMENTING TREATMENTS THROUGH THE FOREST PLANNING PROCESS**

Disease and Insect Infestation: The preferred alternative for stewardship of roadless areas. Specific treatments would be prescribed and implemented through local forest planning. (Individual, Klamath Falls, OR - #A4970.31220)

**BY REINTRODUCING FIRE TO ROADLESS AREAS**

I believe the Forest Service has made significant progress in allowing fire to return to "inventoried" roadless areas and other unroaded areas such as designated wilderness areas. The fire plan for the existing Selway Bitterroot Wilderness area is an excellent example of such a plan. I see no reason why similar approaches cannot be taken for the inventoried roadless areas. The final rule allows for prescribed burning and even some logging to protect ecological integrity.

As far as insect and disease outbreaks go, I think that reintroducing fire into roadless areas will help to reduce the potential threat of insect and disease outbreaks. As I am sure you are aware, insects and disease are important factors in maintaining ecological health of the system. Many wildlife species, for example, are dependent on insect and disease outbreaks for their very survival. A healthy forest is not necessarily insect and disease free. As you will recall the findings of the Interior Columbia River Basin

study suggest that inventoried roadless areas contain some of the most ecologically intact areas in the entire basin. I am sure this is true in other roadless areas across the country.

Passing the roadless rule is not going to change the natural processes that have been ongoing in these areas for thousands of years. The existing roadless areas are the areas where we have the best chance of maintaining the beneficial effects of natural ecological processes such as fire, disease and insects. Yes, we can never return completely to historical conditions due to significant alterations that we humans have already made across the landscape. However, within the roadless areas we have our best chance to come close and maintaining these processes without threatening human development. (Individual, Moscow, ID - #A4871.30100)

#### **BY IMPLEMENTING REASONABLE FIRE POLICIES IN ROADLESS AREAS**

In the 1980s the Forest Service spent millions of dollars in studies of the Douglas-fir tussock moth and the spruce budworm. Research showed that the predominant characteristic of stands with outbreaks was that the trees were on poor site classes and would probably not have been significant stand components if fire regimes had been maintained. Thus, disease was a function of fire management policies and poor silvicultural decisions. If reasonable fire policies were implemented on roadless areas, disease outbreaks would probably be reduced dramatically. (Individual, Bozeman, MT - #A17508.30400)

#### **BY PROHIBITING SINGLE-SPECIES REPLANTING**

Stop single-species replanting if you really want to reduce insect/disease outbreaks. (Individual, No Address - #A29646.30100)

Managing for prevention of insect outbreaks can be handled by planting a greater diversity of trees. (Elected Official, Bozeman, MT - #A27736.30200)

Pristine areas like the "Roadless Areas" are resilient, and they can and have withstood these insect invasions, for thousands of years, long before humans arrived on the continent. Insects usually attack trees that are stressed by climate changes (e.g. droughts) that are perfectly normal. There are two unusual insect infestations: those caused by exotic, introduced species for which there are no natural enemies, and in monocultures such as tree plantations where only one species is planted. Insect outbreaks affect a single species. Monoculture can lead to the loss of an entire forest. Needless to add that "Roadless Areas" are complex ecosystems comprising of varying age class (not a sterile monocultural well logged even aged tree farm), that can naturally withstand insect infestations. It is habitat fragmentation that jeopardizes forest health. The primary reason for that would be roads, followed by logging or other forms of material extraction. Thus a weakened ecosystem would be susceptible to insect and disease invasions. (Individual, Seattle, WA - #A26287.30100)

#### **WITH PROPER FOREST MANAGEMENT AND PROTECTION PRACTICES TO PREVENT THE SPREAD TO ADJOINING PRIVATE LANDS**

We recommend that considerations be given to adjoining landowners when insect or disease infestations occur on National Forest lands. The Forest should be allowed to apply the proper forest management and protection practices to control these infestations and prevent their spread to adjoining private lands. (Association, Jackson, MS - #A4824.31220)

The Department is of the opinion that the Forest Service must preserve management options in roadless areas. Neither fire, insects or disease stop at property boundaries. The Forest service should not employ national roadless policy that limits forest land managers from making timely decisions on these issues. Protection efforts must focus on the specific needs of each roadless area. A minimal network of unimproved, unclassified roads to provide access for protection purposes may be needed in some roadless areas while not in others. As stewards of public land we have an obligation to prevent the spread of insects, disease and fire onto private property. Living next to a National Forest should not be a potential liability. (State Agency, Madison, WI - #A28775.30100)

There are options that place more focus on how the areas surrounding unroaded areas are managed. For example, if fuel buildup, dangerous wildfire conditions or insect/disease outbreaks are a problem within an unroaded area, efforts could be intensified on adjacent land ownerships to lower their risks (e.g., fuel reduction, structure protection measures, management increase resistance to insects/diseases of concern). Evacuation and communication systems and plans in adjacent areas may also be appropriate if fuel buildup within roadless areas is a problem. (State Agency, Saint Paul, MN - #A30025.30100)

It is a joint responsibility of the Forest Service and communities and landowners to keep trees and brush in a narrow strip, on both sides of the roadless areas boundary, thinned to the point where fires can be controlled. (Individual, San Simon, AZ - #A30339.30400)

Management plans and activities of the national forests should include recognition of risks, such as wild fire, insects, and diseases, to adjacent private lands and communities, the input of national forest neighbors should be considered in the development of those plans. (Individual, Rocky Mount, NC - #A30042.30200)

#### **WITH ADVICE FROM PROFESSIONALS**

Insect pests and disease need to be treated, if at all, on the advice of qualified biologists, those not employed by paper or pulp industries. (Organization, Cookeville, TN #A5451.31220)

I am not a professional forester, so detection and prevention of insect and disease outbreaks is out of my scope. However, within parameters established by budgets and cost benefit analysis, perhaps scheduled field studies by silviculturists, entomologists, and/or aerial surveys would suffice. (Individual, Vista, CA - #A4838.30310)

The best way to manage roadless areas is as follows:

In consultation with disinterested (i.e. not working for industry or the Forest Service) biologists, work to eradicate damaging invasive species such as tamarisk and cheatgrass. (Individual, Dallas, TX - #A18002.30200)

#### **WITH THE IMPLEMENTATION AND ENFORCEMENT OF U.S. DEPARTMENT OF AGRICULTURE RECOMMENDED INITIATIVES**

Implement and enforce USDA recommended initiatives to prevent the spread of introduced diseases. ROADS and logging disturbance are one of the best ways to spread invasive species, another reason to keep roadless areas roadless. Disease outbreaks will have to run their course, experience shows that logging is not a solution. (Individual, Woods Hole, MA - #A12805.31210)

#### **WITH MULTIPLE METHODS**

Weed control/using multiple methods that are integrated should receive priority also. (Individual, No Address - #A101.31300)

You have requested comments on how roadless forest areas should be managed to protect them from severe wildfires or insect outbreaks. We submit that Nature has its own built-in protections if allowed to work and, thus, the Forest Service should try to replicate them as nearly as possible. For example, fire is a natural component of natural forests. In many instances, you can allow wildfires to burn themselves out, and that way the build-up of hazardous fuels is avoided. The same is true of most insect and disease outbreaks. We now, in the southeast, have outbreaks of the Southern Pine Beetle and have noted plots in the national forests that have been completely killed by them. However, those were artificial plots where the trees were planted within a yard of each other. They were, consequently, stressed when not thinned (and they were not) and so became obvious dessert for the beetles. The answer is to provide for natural revegetation and not artificial stands that are subject to insect outbreaks. [Footnote 2: There are certain infestations, however, that require attention because they are the result of impacts from outside sources. One is the Gypsy Moth, and a lot of research has gone into what types of protection are the best. It

appears that use of the virus known as Gypcheck and a fungicide (*Entomophaga maimaiga*) are preferable because they are target-specific to the Gypsy Moth. Other preferable treatments are biological controls such as mating disruptions and sterile insect releases. Use of broad-spectrum insecticides like Diflubenzuron are not desired because they affect many beneficial moths and butterflies, including even the Monarch butterfly. A similar problem is noted with *Bacillus thuringensis* since it is also not target-specific to the Gypsy Moth. Thus, some treatment may be necessary on natural areas because of invasions by this non-native insect pest.] (Organization, Birmingham, AL - #A21582.30100)

#### **WITH CHEMICALS AND OTHER SOLUTIONS**

Insect and disease breakouts should be fought with chemical or other solutions when they are caused by alien species or when they arise as an effect of environmental damage (e.g., we should fight insect species that become immune to natural defenses as a result of their exposure to genetically engineered organisms). (Individual, Norwalk, CT - #A884.31220)

A problem: Our pine trees are being slaughtered by beetles. In some areas around Dale Hollow Lake (East of Celina) are dying in large patches and other areas . . . . Is there some way to spray to stop these beetles? (Individual, Celina, TN - #A11902.31210)

#### **WITH AERIAL APPLICATIONS**

Insect and disease control can be accomplished by spraying from airplanes not sitting at desks. (Individual, Ogden, UT - #A280.31220)

During the 1950s when the FS hired temporary employees in the summer to go into the forest to spray for pine beetles and insects and they walked into the forests. Horses can also be used. Couldn't this be done again? Why do we need roads every where? (Individual, Ogden, UT - #A1166.31221)

#### **IN ROADED AREAS IDENTIFIED AS SUITABLE FOR LOGGING**

Concerning insect and disease outbreaks, the Forest Service might consider a strategy that focuses its workforce on detecting and preventing outbreaks in roaded areas that are identified as suitable for timber production. Focusing on these areas rather than spreading limited resources over both roaded and unroaded areas would be a better use of limited resources. We believe that concentrating resources in these areas and gaining the economies of scale would provide better protection in roaded areas. (Federal Agency, Washington, DC - #A28843.31200)

#### **OUTSIDE OF ROADLESS AREAS**

The roadless areas should be left alone as much as possible, to provide a natural environment for the benefit of wildlife and protection of water, soil and air resources. Insect and disease outbreaks should be fought OUTSIDE of the roadless areas. (Individual, No Address - #A30493.30100)

#### **EXCEPT IN LARGE-SCALE TRACTS OF LAND**

Forests need to be big enough to sustain the heavy loss of big beetle kills, so that subsequent big fires can kill beetle larvae, or the root rot, and burn in a mosaic that encourages self seeding. It is simply not possible to recreate such natural forces through harvest. Period. Certainly in areas of human habitation, beetle kill and root rot, etc. needs to be contained, but not in large-scale tracts. These dynamic pestulances have occurred for millennia, and result in more genetically resilient ecosystems. We shouldn't have to protect forests from beetle infestations and fires—forests have been taking care of themselves just fine, until we reduce their size to unhealthy proportions. (Individual, No Address - #A30491.30100)

#### **AT THE LOCAL LEVEL**

The second example in NW Montana involves the Douglas Fir beetle, which is becoming epidemic in selected locations. How do our Forest Managers confront this challenge when some parcels are considered off limits? Is it acceptable to not have a forest protection plan for the whole forest? Can we allow an epidemic to start in a roadless area, only to spread to adjacent lands (both public and private)?

Again, the place to address these issues is at the Forest and District level, not by National Rule making. (Permit Holder, Whitefish, MT - #A20669.31200)

**1570. Public Concern: The Forest Service should allow even age management only in areas experiencing an onslaught of pests.**

A practical solution is a timber harvest program such as the one used by the Mescalero Apache Tribe. This is a European type of sustained yield silvaculture. Clear cuts are seldom employed except in areas where almost all the trees are experiencing an onslaught of pests. (Individual, Ruidoso, NM - #A17775.65230)

## *Ecosystem/Restoration Management*

**1571. Public Concern: The Forest Service should acknowledge that native insects and diseases are part of a healthy ecosystem.**

**BECAUSE THEY ARE VITAL TO ECOLOGICAL SUSTAINABILITY AND BIODIVERSITY**

Besides wilderness lands, roadless areas represent the most ecologically intact and healthy forests managed by the agency. They do not require protection from insects are an integral part of what makes them functions and serve as habitat for a biologically diverse array . . . of native species. There is simply no ecological or scientific need for hands on insects or disease management in roadless areas. The agency obsession with protecting individual trees or stands of trees is antithetical to ecosystem sustainability and detrimental to the conservation of biodiversity on public lands. (Organization, Missoula, MT - #A17234.31210)

Insect infestation and disease should be left untreated. (Individual, Bozeman, MT - #A6250.31220)

The answer to this question is known to all professional biologists like myself; the best management is **no** management. Insect and disease outbreaks are natural and necessary occurrences that contribute to the diversity of forest habitats and form the basis for many important forest cycles. The fact that they interfere with timber production is not a forest health issue, it is a corporate profits issue. Healthy, functioning forests require fire, insect and disease outbreaks, and blowdowns to function as ecosystems, and the public interest lies in protecting these ecosystems, not maximizing the profits of a few private, special-interest groups. (Individual, Laramie, WY - #A10590.30100)

The SPB is not a pest on Federal Land but a beneficial insect needed to provide food and habitat for other wildlife. The SPB is only a pest to timber growers which should not be the primary purpose of our public lands as it has in the past. (Individual, Augusta, GA - #A4688.31210)

**BY EXPLAINING THE ROLE INSECTS PLAY IN FOREST NUTRIENT CYCLING AND RENEWAL**

The rule should address the essential role that insects play in forest nutrient cycling and renewal. Emphasizing individual tree health subverts the goal of ecosystem management integrity and long-term sustainability of forests and their myriad biotic components of a healthy forest. Decaying and dead trees are essential components of a healthy forest. (McClelland and McClelland 1999). Further:

Pathogens help decompose and release elements sequestered within trees, facilitate succession, and maintain genetic, species and age diversity. Intensive control measures, such as thinning, salvage, selective logging, and buffer clearcuts around affected trees remove crucial structural features. Such activities also remove commercially valuable, disease-resistant trees, thereby contributing to reduced genetic vigor of populations (Castello et al. 1995). (Organization, Missoula, MT - #A613.31210)

**BY NOT ASSUMING ROADLESS AREAS ARE IN AN UNHEALTHY STATE**

[Question 3] This is an embarrassing question because it presupposes roadless areas are in an unhealthy state and that only Forest Service managers via its entourage of loggers, cattle and sheep men can bring these sick and ailing roadless areas back to health. That whole concept verges on ecological illiteracy

and it is troubling to see the “new” Forest Service head back in that direction. It is preposterous to suggest roadless areas as a class of landscapes suffer from such ailments—maybe some do, not all!

More to the point, the question isn’t how we intervene in roadless areas, but the importance of not intervening in roadless areas to assure old and dying trees are part of the system and to assure fires burn the way integral forests “intended” fires to burn—the same with pathogens. These are as normal as the sun and moon and the sky.

Given that, where intervention is necessary, and we believe it is in some cases, but not uniformly and across the board as this question suggests, the NRAC rule defined exception after exception, most built on sound ecological principles and underpinned by meaningful policy and policy making. (Organization, Hyrum, UT - #A13496.30100)

## **1572. Public Concern: The Forest Service should control insects, disease, and noxious plants.**

### **WITH NATURAL REMEDIES**

Insect and disease outbreaks should be controlled as much as possible with natural remedies, and any non-natural solutions should be weighed against long-term effects. For example, we shouldn’t wipe out a noxious weed at the expense of other plants and animals in the area. (Individual, Shawnee Mission, KS - #A96.50300)

### **WITH SPECIES DIVERSITY AND MULTI-AGE STANDS**

Species diversity and multi-age stands of trees are two ways that the impacts of disease and insect infestations can be decreased. Epidemic size outbreaks might be better treated with some of the savings from decreased fire control. (Individual, No Address - #A405.31220)

### **BY PROHIBITING ROAD CONSTRUCTION IN ROADLESS AREAS**

Protecting roadless areas is one of the most effective strategies for curtailing invasions by exotic or alien species of plants—also called invasive weeds. The Forest Service estimates that 6 million acres are already infested. (The invasion is actually probably much more extensive, since these data do not include cheatgrass or many of the shrubs and vines invading eastern forests.)

While little data are available on weed infestations in National Forests in the east, they are clearly extensive. Forest Service monitoring data show that just one of the probably 100 exotic plant species invasive in these forests, Japanese honeysuckle (*Lonicera japonica*), is found on 16 million acres of public and private forest in just six states of the southeast. Privet (*Ligustrum* spp.) occupies 2.4 million acres of these forests. Purple loosestrife is a pervasive problem in ditches and wetlands of the northwoods.

These weeds have severe ecological impacts. 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 that 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, all terrain vehicle (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. (Organization, Plymouth, MN - #A7116.30100)

**BY ENCOURAGING A PROLIFERATION OF SONGBIRDS AND OTHER NATURAL PREDATORS THAT FEED ON INSECTS**

While there may be limited justification for harvesting trees in order to serve stewardship purposes, the first line of defense in forest health should be the use of natural elements. A forest that has a mosaic of composition and structure is less likely to have severe disturbances than one that is or resembles a plantation. Also, a proliferation of songbirds, and other species that feed on insects, needs to be encouraged. Removing dead trees from a forest removes the habitat essential for cavity nesters that feed on insects (e.g., woodpeckers). (Organization, Anchorage, AK - #A17358.30100)

How should inventoried roadless areas be managed to provide for healthy forests, including protection from severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreaks? . . . Natural predators for insects. (Individual, Ellijay, GA - #A8020.30100)

**BY CLOSING ROADS**

A root rot fungus is wiping out the rare and valuable Port Orford cedars in this area; the die-off is most intensive along roads, where vehicles carry the fungus spores from infected areas to healthy ones. Local Forest Service officials need to close many of these roads, but local pressure from motorcycle and other vehicle groups is apparently more than they can stand up to; wet-season restrictions are posted, but the roads are still there and the trees are still dying at a shocking rate. (Individual, Medford, OR - #A12075.90310)

**1573. Public Concern: The Forest Service should allow wildfires to destroy insects and disease.****RATHER THAN USING TIMBER REMOVAL TO DESTROY THEM**

The best (and least expensive) way to kill destructive insects and diseases is to allow wildfires to destroy them. Logging slash, in fact, serves as nurseries for diseases and insects such as bark beetles. (Individual, Fairbanks, AK - #A13293.31320)

**1574. Public Concern: The Forest Service should not use pesticides and herbicides.**

Pesticides and herbicides should never be used as they pollute the environment and poison both humans and wildlife. (Individual, Marion, NC - #A4691.31220)

Pesticide use should be banned in inventoried and non-inventoried roadless areas. (Individual, New Haven, CT - #A8987.31220)

As far as pest prevention is concerned - spraying a forest with herbicides may be more detrimental to the forest ecosystem as a whole versus letting nature take its course. (Association, No Address - #A17699.31321)

**1575. Public Concern: The Forest Service should control only exotic or non-native insects and diseases.**

Regarding the management of inventoried roadless areas to provide for the detection and prevention of insect and disease outbreaks, the Forest Service should make clear that insects and diseases are part of a healthy forest. We note the exception of exotic or non-native species such as the gypsy moth and believe that provisions can be made for the well-justified control of these invaders. There are also periodic epidemics of native insects and diseases that may warrant control measures. (Civic Group, Roanoke, VA - #A1713.31210)

Disease and insect outbreaks of natural origin should be allowed to run their course. More active management may be needed if the pathogens or insects are exotic species brought in by man. (Individual, Painted Post, NY - #A357.31220)

Forest Service managers should let nature take its course concerning native disease and past outbreaks.

Forest Service managers should make every effort to prevent and/or counter any non-native disease or pest outbreak. Such efforts should include determination and introduction or enhancement of naturally occurring resources, including safe and controllable non-native resources, to counter non-native disease and pestilence. (Individual, Saint Louis, MO - #A629.31220)

We submit that Nature has its own built-in protections if allowed to work and, thus, the Forest Service should try to replicate them as nearly as possible. For example, fire is a natural component of natural forests. In many instances, you can allow wildfires to burn themselves out, and that way the build-up of hazardous fuels is avoided. The same is true of most insect and disease outbreaks. We now, in the southeast, have outbreaks of the Southern Pine Beetle and have noted plots in the national forests that have been completely killed by them. However, those were artificial plots where the trees were planted within a yard of each other. They were, consequently, stressed when not thinned (and they were not) and so became obvious dessert for the beetles. The answer is to provide for natural revegetation and not artificial stands that are subject to insect outbreaks. [Footnote 2: There are certain infestations, however, that require attention because they are the result of impacts from outside sources. One is the Gypsy Moth, and a lot of research has gone into what types of protection are the best. It appears that use of the virus known as Gypcheck and a fungicide (ntomophaga maimaiga) are preferable because they are target-specific to the Gypsy Moth. Other preferable treatments are biological controls such as mating disruptions and sterile insect releases. Use of broad-spectrum insecticides like Diflubenzuron are not desired because they affect many beneficial moths and butterflies, including even the Monarch Butterfly. A similar problem is noted with *Bacillus thuringensis* since it is also not target-specific to the Gypsy Moth. Thus, some treatment may be necessary on natural areas because of invasions by this non-native insect pest.] (Organization, Birmingham, AL - #A21582.30100)

## **1576. Public Concern: The Forest Service should protect roadless areas.**

### **TO CURTAIL INVASIONS BY EXOTIC OR ALIEN SPECIES OF PLANTS**

Protecting roadless areas is one of the most effective strategies for curtailing invasions by exotic or alien species of plants—also called invasive weeds. The Forest Service estimates that 6 million acres are already infested. (The invasion is actually probably much more extensive, since these data do not include cheatgrass or many of the shrubs and vines invading eastern forests.) The grasslands and meadows of the northern Interior West suffer some of the most damaging exotic plant invasions of anywhere on Earth. About one-third of the Intermountain Region is infested by cheatgrass (*Bromus tectorum*). Yellow starthistle (*Centaurea solstitialis*) covers more than 12 million acres in ten states and two Canadian provinces. Spotted knapweed covers 7.2 million acres in nine states and two provinces, including 4.7 million acres in Montana (Beck 1993).

These weeds have severe ecological impacts. Cheatgrass is one of the weeds considered to be an “ecosystem changer.” Wildfires fueled by cheat have virtually eliminated native sagebrush and rabbitbrush depended on by wildlife, including mule deer, antelope, raptors, songbirds, rabbits, and native lizards. Among the more than 1,000 exotic plant species in 5 states in the Pacific Northwest and northern Interior West, some are even less useful for wildlife than is cheatgrass. Knapweed invasions have severely damaged the value of foothill grasslands in western Montana’s Missoula and Bitterroot Valleys for winter elk range, for example. While research on the impacts of the vines and shrubs in the eastern forests has so far been limited, it has shown that Japanese honeysuckle impedes regeneration of both managed and natural forests. Research in Ohio found that robins and wood thrushes raised fewer young in nests placed in certain exotic shrubs than in those located in native shrubs. Others have shown reduced numbers of soil invertebrates beneath exotic shrubs. (Organization, Nevada City, CA - #A4941.31310)

Current efforts are not adequate to control these invaders [exotic and invasive plants]. The Forest Service spends approximately \$5 million annually on invasive plant control, yet this funds control efforts on only 100,000 of the more than 6 million acres invaded by exotic plants. It is hardly surprising that noxious weeds continue to spread across our western public lands at a rate estimated at 4,600 acres per day—that is, they cover a new area the size of Delaware every year. Again, this figure is surely an underestimate because it doesn't include many of the species invading our forests and grasslands.

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 that 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 open 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, all terrain vehicle (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.

Finally, weeds are spread from centers of infection by wildlife, wind, and water. These centers are often established by 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*. (Organization, Nevada City, CA - #A4941.31320)

### **1577. Public Concern: The Forest Service should not use forest health as an excuse to harvest timber.**

#### **DO NOT CLAIM HARVESTING IS NEEDED TO PREVENT INSECTS AND DISEASE**

Diseases and pests cannot all be prevented, nor should they be, and they are likely to be worse in areas that have been heavily cut, where new young trees are stressed by overcrowding and poorer soil because of erosion. For example, one argument for clearcutting is that it prevents the spread of dwarf mistletoe. Many mature forests have an occasional tree infested with mistletoe, but this does not kill them, and the majority of trees remain healthy. One forest service official admitted to me that the only reason that dwarf mistletoe needs to be controlled is to enhance timber production. So without timber harvest, forest health is not impaired by mistletoe. Even where trees do die of diseases and infestations, the dead trees have important functions in replenishing the soil and providing wildlife habitat. (Individual, Laramie, WY - #A30702.30000)

#### **BECAUSE INSECTS AND DISEASE RARELY RISE TO EPIDEMIC LEVELS**

The correct answer here, except in a very few rare and narrowly defined situations, is to let nature take its course. Contrary to popular opinion, nature does know best. I fear that alleged insect and disease outbreaks and fire hazard reduction will continue to be just the excuses the Forestry Circus, local economic interest, and their political toadies want and need to go in and continue to “manage” the forests.

A single bark beetle or tussock moth does not an epidemic make! Insect and disease levels rarely rise above endemic levels, contrary to the preachings of the timber industry, its wholly-owned politicians, and Forestry Circus pre-sale foresters, silviculturalists and others with vested interests in trying to make us believe otherwise. As for “the buildup of hazardous fuels”, in the Intermountain and Great Basin West, and probably in much of the rest of the country, it's too cold and dry for logging and thinning slash to be left on the forest floor and expected to decompose. Slash and other logging/thinning debris will just lay there and contribute to an even bigger fire hazard unless it's chipped and scattered on site or

completely removed from the forest—neither of which, are very economically viable propositions.  
(Individual, Leadore, ID - #A20898.30100)

## Protecting Communities (Question 4)

### **Question 4: Protecting Communities, Homes, and Property. How should communities and private property near inventoried roadless areas be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal lands?**

This section includes two subsections: Private Property Protection and Responsibility for Protecting Private Property.

### **Private Property Protection**

#### **Summary**

**General Comments** – Several respondents question the need to focus attention on private property protection. One organization states that there is no need to revise the Roadless Area Conservation Rule with respect to private property protection because “few concentrated populations of either individuals or communities occur near inventoried roadless areas. Due to these population densities, a fire spreading from an inventoried roadless area would have little opportunity to endanger human life or property.” Similarly, a group says that in some regions there is no need to protect communities from forest fires as they may be dominated by “fire resistant” ecosystems.

Other general comments include the recommendation that the Forest Service provide accurate maps depicting the location of “private lands within and adjacent to high-risk roadless areas,” and the suggestion that the Forest Service formulate a limited management plan to address fuels reduction in stands of trees close to towns.

**Adequacy of Analysis** – Several respondents question the adequacy of analysis relative to private property protection. One association requests that the Forest Service “conduct a formal, localized risk assessment of the consequences of prohibiting active management within these areas.” One individual suggests that “commercial logging is not necessary in our roadless areas to reduce fire risks,” and “management of the surrounding public lands to reduce fire risks should only happen after a complete inventory is made of communities at risk.”

**Management** – Respondents’ comments regarding implementation of the Roadless Area Conservation Rule are reflected in their management suggestions for protecting private property. Some people assert that “private property should be protected in accordance with the existing roadless rule,” as it already “allows for activities that would reduce the threat to lands . . . from catastrophic fire, insect or disease on nearby roadless areas.” Others suggest further that the Forest Service use the basic “fire fighting policies it has in place now . . . but it should not include building roads into roadless areas.” Similarly, some recommend not allowing commercial timber removal in roadless areas, maintaining that the Forest Service should not allow timber removal in the name of fire prevention for private property. Furthermore, another individual encourages the Forest Service to reconsider its policy to temporarily suspend

wilderness standards regarding wildfire suppression when communities adjacent to National Forest System lands are threatened.

Other respondents assert that local decisionmaking will lead to more effective protection of private property. One county elected official requests that “areas that are to be protected but not recommended as Wilderness should be allocated to a recognized land use category that allows for a locally specific complement of land management activities.” An association concurs, and requests that the Forest Service “retract policies that interfere with local fire suppression and control.” Several individuals state that the Forest Service should allow management activities in general which “reduce the risks of catastrophic wildfires and insect and disease infestation.” Another person suggests there be a different management policy for whole functioning communities on or near National Forest System lands.

In the context of management related to private property protection, several respondents question the integrity of the Forest Service. One respondent asserts that the Forest Service is not being open about its policies: “We have had to expend considerable effort to attempt to pry information from Forest personnel about roads and other topics relating to our properties.” One organization states that the Forest Service should “confine their interests to National Forests within their boundaries and not extend their power to private lands.” Additionally, an association questions the Forest Service’s intentions when it establishes a “roadless area” near private land holdings, and requests that “the appropriateness of such a designation” be carefully scrutinized.

A further management suggestion is that the Forest Service should balance private development with “the need for wide open spaces” and the need to protect “critical winter wildlife habitat.” Finally, a few respondents ask the Forest Service not to “risk anyone’s life to preserve property” and “not [to] take heroic measures to protect houses with wooden shingles.

**Land Use Ordinances/Building Codes** – The commenting public makes several suggestions to the Forest Service about how to discourage residential development near public land, how to revise building codes, and how to work with the homebuilding industry and with private property owners to reduce fire related damages to private property. A number of individuals who comment on the subject of development near public land state that “residential development” should be kept “away from public lands.” One person recommends strongly discouraging new settlement “in areas that carry risk of natural disasters such as forest fires.” This can be done by discouraging “developers from building in areas that are prone to recurring natural disasters,” or by making “such developments less qualifiable for recovery insurance.” Another suggestion for protecting private property from fire is to revise building codes to set construction standards that minimize likelihood of fire damage “not unlike that which has taken place in states where hurricanes and floods occur.” One organization suggests that the Forest Service “work with the homebuilding industry to ban roofs that put people at high risk from fires.” Finally, one individual suggests that the Forest Service secure conservation easements from private property owners located near roadless areas “which will put the interests of protection and preservation of natural forest values first.”

**Urban-Forest Interface** – Many of the comments relating to the urban-forest interface state that the buffer zones and firebreaks should be created and maintained. The first step, according to one group, would be to identify urban-forest interface areas and develop appropriate prescriptions for the management of these areas. One individual suggests that roadless areas should be “a buffer between Wilderness and the urban interface.”

Others request buffer zones or firebreaks between roadless areas and private property. For example, one individual states, “A buffer zone around such roadless areas should be established with incentives limiting the amount of future development in that area.” Another respondent suggests working “with local communities, and property owners to provide ‘fire breaks.’” The commenting public offers many suggestions for buffer zone requirements, such as a minimum width of 500 feet. Another individual suggests that “minimally urbanized areas should be maintained as buffer zones between roadless areas and human communities. Creation of carefully selected ‘unmanaged zones’—areas where disease prevention, fire suppression, and insect control are not practiced—should be implemented in conjunction with accompanying buffer zones where more standard management practices exist, thus allowing the buffer areas to serve as transition zones from roadless areas to more urbanized regions.” Finally, in cases where there may be “an unreasonable threat to private land,” the land should be purchased by the government and then used “as a buffer zone.” Some respondents assert that communities and private property owners should take the initiative for constructing their own buffer zones. One business owner suggests that “ski areas located adjacent to communities” may function as buffer zones against fire.

Some respondents question the advisability of creating buffer zones as a means of fire management. One individual asserts that buffer zones may not always be appropriate, stating that “this ‘buffer zone’ investment should only be employed where the adjacent private property values warrant.” This individual further states that in the case of low-value land, a land exchange may be more appropriate. Another individual remarks that “roadless areas must not be fragmented by road building or firebreak building.” Finally, one organization suggests that “wildland fuel reduction for reducing home losses may be inefficient and ineffective.” Instead buffer zones may “be a high priority for extensive vegetation management due to high aesthetic, watershed, erosion, or other values, but not for reducing potential home loss.”

**Urban-Forest Interface Funding** – One individual asserts that the Forest Service is improperly using funds earmarked for “fuels reduction projects in the urban-wildland interface zone. Instead of directing resources to protect communities, . . . the Forest Service is using emergency monies for large-scale commercial timber sales in the nation’s most pristine forestlands, including roadless areas, [and] old growth forests.”

**Public Collaboration** – The public offers many suggestions on how the Forest Service should work with local, state, and federal agencies to plan for and combat wildfire and other natural disasters near private property. Several respondents assert that the Forest Service should work “with local and federal agencies to plan for emergencies;” and in the event of a wildfire, “the Forest Service should cooperate with state and local agencies to bring the fire under control.” Another individual states that “the decision on whether to initiate aggressive fire management in non-roadless areas should be a component of the local fire management plan.” Several individuals encourage the Forest Service to develop an “educational plan that is given to every resident in these surrounding areas and work with these communities to get them involved with the care and protection of the forest and their own properties.” One business suggests that education take place in the form of “fire protection and prevention seminars.” Some individuals advise the Forest Service “to work with other federal agencies to implement better land use planning. Because local communities have failed so miserably at land use planning in this regard, federal guidelines are needed.” Others suggest that public collaboration include keeping a log of

nearby property owners in order to “send them a list of emergency phone numbers,” and that “private inholders should be seen as potential partners in forest and wildlife habitat stewardship.”

### *Private Property Protection General*

#### **1578. Public Concern: The Forest Service should consider that there are few concentrated populations of either individuals or communities near inventoried roadless areas.**

##### **DUE TO THESE LOW POPULATION DENSITIES, A FIRE SPREADING FROM AN INVENTORIED ROADLESS AREA WOULD HAVE LITTLE OPPORTUNITY TO ENDANGER HUMAN LIFE OR PROPERTY**

In Colorado, there are few roadless areas near the wildland/urban interface, where this issue becomes important. This is also true nationally:

few concentrated populations of either individuals or communities occur near inventoried roadless areas. Due to these population densities, a fire spreading from an inventoried roadless area would have little opportunity to endanger human life or property.

USDA Forest Service, 2000, p. 3-103.

Note also that of 112,722 fire starts on national Forest System lands from 1986-1996, only 16,611 of them began in roadless areas (USDA Forest Service, 2000, p. 3-104).

Note further that 43.5% of all national forest fire starts in this period were human-caused, but only 13.64% of human caused fires originated in roadless lands (ibid., calculations made from Tables 3-18 and 3-19, pp. 3-104, 105). This indicates that human-caused fires are far more likely to start outside roadless lands. Stated another way, roadless areas have fewer people and thus fewer fire starts. (Organization, Denver, CO - #A12008.30430)

#### **1579. Public Concern: The Forest Service should consider that the Roadless Area Conservation Rule will have no impact on protecting communities from forest fires.**

##### **NEAR THE SAN JUAN NATIONAL FOREST**

Large forest fires are rare in the San Juan National Forest. Most roadless areas on the San Juan are located at higher elevations and many are dominated by fire resistant spruce-fir ecosystems. The combination of deep winter snow pack, late snowmelt, and late summer monsoon storms makes for a wet forest ecosystem that is not very prone to large fires. Most large fires in our area have occurred on low elevation lands under private and tribal jurisdiction. The Roadless Rule will have no bearing on protecting communities from forest fires in our region. (Individual, Durango, CO - #A11655.30100)

#### **1580. Public Concern: The Forest Service should provide accurate maps depicting the location of private lands within roadless areas.**

The Forest Service must analyze potential impacts on communities and private property and must give these national forest neighbors meaningful opportunities to comment on decisions about roadless areas and the wildland/urban interface that might place them at increased risk. Therefore, it will be essential that the Forest Service produce accurate maps of the location of communities and private lands within and adjacent to high-risk roadless areas and the interface. We feel that the GIS database for the roadless areas did not have a complete inventory of private and state lands, so the public did not have an adequate opportunity to assess the proposed decisions. (Association, Augusta, ME - #A13312.35110)

**1581. Public Concern: The Forest Service should formulate a very limited management plan to address fuels reduction in stands of trees close to towns.**

There is a need to clear underbrush and the like from those stands close to towns and a limited (very limited) management plan to address those issues should be formulated. (Individual, Seattle, WA - #A26276.30310)

*Adequacy of Analysis***1582. Public Concern: The Forest Service should conduct a formal risk assessment of the consequences of prohibiting active management within roadless areas.**

The members of AFRC believe that the Forest Service must conduct a formal, localized risk assessment of the consequences of prohibiting active management within these areas. This was not done in the last assessment of the roadless areas. What are the risks of wildfires and insect and disease infestation, on these and adjoining lands if no active management is undertaken? Each roadless area is unique. Forest types, stand conditions, values at risk, management objectives and the context of the area in relation to the surrounding lands are among the factors that must be considered. This argues strongly for the use of the forestland management planning process. (Association, Portland, OR - #A19004.35210)

**1583. Public Concern: The Forest Service should complete an inventory of communities at risk.****WITH THE COOPERATION OF OTHER FIREFIGHTING ORGANIZATIONS**

Forest Service research has shown that the most effective fire protection plan for communities adjacent to both roadless and non-roadless areas is by managing the immediate vegetation within several hundred feet of structures. Management of the surrounding public lands to reduce fire risks should only happen after a complete inventory is made of communities at risk with the cooperation of other fire fighting organizations. Such management should focus on prescribed burns and proper removal of forest fuels. In the Forest Service's own National Fire Plan it was found that "the removal of large, merchantable trees from forests does not reduce fire risk, and may, in fact, increase such risk." In fact, U.S. Forest Service chief fire specialist Denny Truesdale has stated that the woody materials that need to be removed from our forests to prevent catastrophic fires are shrubs, twigs and saplings less than 3 inches in diameter—not mature trees. These Forest Service reports concur with the goals of the roadless rule as it stands. Commercial logging is not necessary in our roadless areas to reduce fire risks. (Individual, Bend, OR - #A27922.30200)

*Management***1584. Public Concern: The Forest Service should protect private property in accordance with the Roadless Area Conservation Rule.****BECAUSE IT ALLOWS ACTIVITIES TO PROTECT ADJACENT LANDS**

Communities and private property should be protected in accordance with the existing Roadless Rule. It allows for activities that would reduce the threat to lands owned by states, tribes, private companies, or individuals from catastrophic fire, insect or disease on nearby roadless areas. (Individual, Spruce Pine, NC - #A17504.20000)

**1585. Public Concern: The Forest Service should continue to use the same basic fire-fighting policies it has in place now for protecting communities and homes.**

**WITH THE EXCEPTION OF ROAD BUILDING**

The Forest Service can continue to use the same basic fire fighting policies it has in place now for protecting communities and homes but it should not include building roads into roadless areas to fight fires or to “salvage” timber in those areas. It is a well-known fact that fire is an essential part of the long-term health of a forest and nature must be allowed to take its course wherever possible. (Individual, Tenakee Springs, AK - #A5083.35210)

**1586. Public Concern: The Forest Service should not allow timber removal in the name of fire prevention for private property.**

People living immediately adjacent to roadless areas have made that choice to be near wilderness and thus should be responsible for their own plan for dealing with fires, etc., through such things as the creation of defensible space on their property. It is not the responsibility of federal agencies to have to create buffer zones between them and federal land. The argument for “thinning” of forests in roadless areas is nothing more than a ruse on the part of timbering interests to gain access to the timber for their own gain. (Individual, Missoula, MT - #A5325.35000)

Protecting Homes and Property: The construction of homes near forests should never be used as an excuse to approve more logging. The homes should be constructed in a defensible manner, and the owners should accept the risks just as people who choose to live in flood plains live with floods, people in California live with earthquakes, people on the Gulf Coast live with hurricanes, etc. (Individual, Reno, NV - #A5110.35230)

**1587. Public Concern: The Forest Service should reconsider its policy to temporarily suspend wilderness standards regarding wildfire suppression.**

**WHEN COMMUNITIES ARE THREATENED**

In the Eastern U.S., we have wilderness areas that adjoin private property and communities. Wilderness standards regarding wildfire suppression can be temporarily suspended by the regional forester when communities are threatened, however this can take valuable time and is certainly not the best situation if it can be avoided. The trade-offs between wilderness or backcountry management and efficient fire suppression must be carefully weighed through roadless area evaluations and face-to-face discussions with our communities of interest. Again, interests in Washington DC, whether they are the Wilderness Society, the Heritage Forest Campaign, the American Pulp and Paper Association, or the Forest Service Washington Office cannot, and should not answer this question. (Individual, No Address - #A5341.35000)

**1588. Public Concern: The Forest Service should assign a land use category to protected areas which allows locally specific management activities.**

**TO PROTECT COMMUNITIES IN THE URBAN-FOREST INTERFACE ZONE**

Management restrictions imposed on areas Congressionally-designated as wilderness present a tremendous challenge to rural communities located on the urban interface, where the threat of wildfire conflagrations is high and the ability to reduce or minimize those hazards is almost non-existent, given the prohibition to the use of mechanical treatment and other prescriptions not permitted in Wilderness areas. A perfect example of this is the Mokelumne Wilderness in Alpine County, where wilderness boundaries border residential and vacation homes in Shay Creek near Grover Hot Springs State Park in a boxed-in canyon. Insect infestation and tree mortality compounded by drought conditions in recent months makes this area highly susceptible to wildfire conflagration, threatening life, expanding these areas. Immediate attention should be given to reducing the threat of wildfire plan. Areas that are to be

protected but not recommended as Wilderness should be allocated to a recognized land use category that allows for a locally specific complement of land management activities. (Elected Official, Markleeville, CA - #A8597.25340)

**1589. Public Concern: The Forest Service should retract policies that interfere with local fire suppression and control.**

Unlike other states, North Dakota counties do not look to the Forest Service as the primary fire fighter, but the agency needs to retract policies that interfere with local fire suppression and control. (Organization, Denver, CO - #A21358.35120)

**1590. Public Concern: The Forest Service should allow management activities on national forests.**

**TO ENSURE THE PROTECTION OF PRIVATE LANDS**

Management of national forests, or lack of, should not pose additional risks to adjacent private lands or communities. Therefore, management activities should be accomplished that reduce risks of catastrophic wildfires and insect and disease infestation. The Forest Service must analyze potential impacts on communities and private property and must give these national forest neighbors meaningful opportunities to comment on decisions about federal lands that might place them at increased risk. (Individual, Longview, WA - #A6016.35000)

**1591. Public Concern: The Forest Service should establish different wildfire management policies for areas where there are whole functioning communities on or near national forests.**

In cases where whole functioning communities exist on or near National Forest land, wildfire management should be different. These local communities and the federal government (Forest Service) should collaborate to provide solutions for protection. This solution should be limited to actions that pose little to no ecological harm. (Individual, Akron, OH - #A17697.35220)

**1592. Public Concern: The Forest Service should be forthcoming with information regarding management of private property and surrounding areas.**

My family and I remain very concerned about how "Roadless" rules will affect our private properties, access to them, and potentially diminish their value. Also related to these serious concerns is our historical experience, in which we had difficulty in obtaining road information from the Forest Service. We feel that we have had to expend considerable effort to attempt to pry information from Forest personnel about roads and other topics relating to our properties and to the Inyo National Forest management of their immediate surroundings. We believe that our concerns and experiences may not be unique and may apply to other owners of inholdings within National Forests. (Individual, Lancaster, CA - #A18019.35000)

**1593. Public Concern: The Forest Service should not seek to manage private lands.**

We believe the government should manage our land fairly and confine their interests to National Forests within their boundaries and not extend their power to private lands. (Organization, Concord, CA - #A6998.12100)

**1594. Public Concern: The Forest Service should scrutinize the appropriateness of roadless designations near private property.**

Establishment of a "roadless area" near private land holdings should be severely scrutinized as to the appropriateness of such a designation under those site-specific conditions. (Association, Cody, WY - #A41559.40000)

**1595. Public Concern: The Forest Service should balance private development with open space and critical wildlife habitat.**

The need for wide open spaces has always been important. Allowing for private individuals to buy and build homes on property that is located on the forest and critical winter wildlife habitat grounds has exploded in recent years. There should be a way to accommodate both. We allow subdivisions to be built in the cities. Rules or laws should contain the amount of land that is improved upon in these critical areas. (Individual, Annabella, UT - #A30323.53100)

**1596. Public Concern: The Forest Service should not risk human life to save private property.**

Do not risk anyone's life to preserve property. Do not take heroic measures to protect houses with wooden shingles. (Individual, Dallas, TX - #A18002.35113)

*Land Use Ordinances/Building Codes*

**1597. Public Concern: The Forest Service should encourage development of land use ordinances which keep residential development away from public lands.**

As in the case of farms, protecting the forests from their neighbors will be a challenge, and will require the enactment of strong land use ordinances which keep residential development away from public lands. (Individual, Dallas, OR - #A3697.70110)

**1598. Public Concern: The Forest Service should discourage settlement in roadless areas due to natural disaster risks.**

We need, however, to strongly discourage new settlement in areas that carry risk of natural disasters such as forest fires. Every time such settlements happen, we have to compromise our wild areas a little more, in order to pick up the pieces for people who know better and are too irresponsible to care. (Individual, No Address - #A49.35000)

Protecting Communities: It is impossible to change the course of the power of nature, the best way to protect communities is to carefully plan and restrict proximity to the current roadless areas. (Individual, Aurora, CO - #A538.35000)

If people choose to move into those regions, there probably is no way to protect them. The best course is to discourage developers from building in areas that are prone to recurring natural disasters. (Individual, Gaithersburg, MD - #A5191.35130)

**BY MAKING PRIVATE DEVELOPMENTS LESS QUALIFIABLE FOR RECOVERY INSURANCE**

One suggestion is to make such developments less qualifiable for recovery insurance. (Individual, Astoria, OR - #A476.35000)

**1599. Public Concern: The Forest Service should revise building codes.**

**TO SET A STANDARD FOR CONSTRUCTION IN FIRE-PRONE AREAS**

Building codes should be revised so as to set a standard for construction in these areas considered as fire prone, not unlike that which has taken place in states where hurricanes and floods occur. The Federal Emergency Management Agency should also become engaged along with the private insurance industry. (Individual, Coulterville, IL - #A114.35000)

**TO PROHIBIT CEDAR SHINGLES FOR ROOFING**

Change building codes so people can't use cedar shingles for roofing in the wildland/urban interface. (Individual, No Address - #A26979.35220)

**1600. Public Concern: The Forest Service should work with the homebuilding industry to ban roofs that put people at risk from fires.**

The Forest Service should also work with the homebuilding industry to ban roofs that put people at high risk from fires. (Organization, Seattle, WA - #A19395.35210)

**1601. Public Concern: The Forest Service should alleviate fire danger to private property through integration of diverse biological systems into the building material's infrastructure.**

By protecting forests we will indirectly protect communities, homes and property through the stabilization of the atmosphere. Unstable atmospheric or ocean-atmospheric turbulence can devastate entire communities, homes and properties. The threat of bush fires on property is of trivial concern. Such concern may be alleviated through correct integration of diverse biological systems into the material infrastructure. (Individual, Curtain Act, Australia - #A29708.35000)

**1602. Public Concern: The Forest Service should require property owners to consent to a conservation easement on their property.****TO EMPHASIZE PROTECTION AND PRESERVATION OF NATURAL FORESTS**

Property ownership implies motivation for maximum economic benefit. With that in mind, property ownership is most often incompatible with the goals and values of Roadless Area Conservation, unless that ownership consents to an effective conservation easement in perpetuity, which will put the interests of protection and preservation of natural forest values first. (Individual, Goldendale, WA - #A21668.35300)

*Urban-Forest Interface***1603. Public Concern: The Forest Service should identify urban-forest interface areas and develop appropriate management prescriptions for them.****TO REDUCE THE RISK FROM WILDFIRE**

In the Forest Plan, urban-forest interface areas should be identified and appropriate prescriptions developed for the management of these areas. The Forest Service is developing fire management plans to reduce the risk from wildfire in many urban-forest interface areas. Roadless areas should be included as an integral part of the fire plan and updated annually and published in the Federal Register. However, fire plans should be consistent with Forest plan direction. If fire plan proposals go beyond plan direction, plan amendments should be considered. (Civic Group, Roanoke, VA - #A1713.30400)

**1604. Public Concern: The Forest Service should protect roadless areas as a buffer between wilderness and the urban-forest interface.**

The roadless forests are a wild wilderness I can't visit easily these days as back packing becomes more physically difficult. They are a buffer between Wilderness and the urban interface—they are easily accessible year round for recreation, whereas the higher Wilderness is in deep snow half the year. We go hiking, camping, backpacking, canoeing, bird watching, wildlife viewing. We go there to be in touch with Nature. My grandkids are growing up in these forests as my daughter did and I did. (Individual, Peshastin, WA - #A22973.45100)

**1605. Public Concern: The Forest Service should establish buffer zones between private property and roadless areas.**

Future developments in such areas: A buffer zone around such roadless areas should be established with incentives limiting the amount of future development in that area. (Individual, Astoria, OR - #A476.35000)

If you follow some ‘safe and sane’ logging practices, so called ‘breaks’ could be developed between ‘roadless’ areas, and private property. (Individual, No Address - #A834.35000)

Where feasible, fire roads could divide federal from private properties (not roads for transit, but to minimize fire spread). (Individual, Whitefish, MT - #A924.35000)

Work with local communities, and property owners to provide “fire breaks”, and educate them as to the dangers involved. (Individual, Tucson, AZ - #A936.35000)

Buffer zones near inhabited areas are appropriate in these areas. This may include areas of cutting/roads 1-3 miles around inhabited areas. **JUST DON’T DEVELOP THE BUFFERS** or they will not be effective and will have to be expanded. This is simple logic. It is our ever-expanding development that creates these problems, not the existence of undeveloped forest. (Individual, Arlington, MA - #A1152.35000)

#### **THAT ARE 500 FEET WIDE**

The IRA land adjacent to local communities and private property should be managed to provide vegetative transition zones, which are narrow “fireproof” buffers about 500 feet wide. These zones would be logged, thinned, and burned to remove and reduce the connective fuels that endanger the communities and/or private property. (Individual, Libby, MT - #A2301.35200)

#### **IN THE FORM OF A REVERSE GREENBELT**

Land use planning/zoning laws should be in place to prevent the concentration of developments adjacent to roadless areas. At a minimum, there should be some requirements for some buffers so that when wildfires do occur, the developments won’t be in such grave danger. Perhaps a “reverse greenbelt” between developments and roadless areas would be useful so essentially a fire line is maintained at all times. (Individual, Olympia, WA - #A26693.35110)

#### **BY MAINTAINING MINIMALLY URBANIZED AREAS AS BUFFER ZONES**

Roadless areas should be managed in such a way that does not “protect” forests from the very natural elements of fire, insects, and disease. Recognizing the full realization of such a plan would be extremely difficult, forests should begin to be managed from a “macro” perspective—understanding and managing external factors that contribute to the proliferation of potentially detrimental elements. Examples include the poorly conceived agricultural practices that stimulate the spread of plant disease and/or explosion of insect populations: as well as tradition of fire suppression that leads to dramatic fuel loading, such as that seen in the Tahoe Basin.

Typical roadless areas are already surrounded by regions that are largely rural, with minimal incursions. Such minimally urbanized areas should be maintained as buffer zones between roadless areas and human communities. Creation of carefully selected “unmanaged zones”—areas where disease prevention, fire suppression, and insect control are not practiced—should be implemented in conjunction with accompanying buffer zones—where more standard management practices exist—thus allowing the buffer areas to act as transition zones from roadless areas to more urbanized regions. This transition zone would provide a measure of protection to both human communities and to the roadless areas. (Individual, Reno, NV - #A27290.30100)

#### **BY PURCHASING INHOLDINGS**

If there is an unreasonable threat to private land then offers should be made by the federal government to buy this land up, acknowledging the risk run by holding the property and to employ it as a buffer zone. (Individual, Lexington, KY - #A1077.35200)

#### **IF THE ADJACENT PRIVATE PROPERTY VALUES WARRANT SUCH PROTECTION**

This “buffer zone” investment should only be employed where the adjacent private property values warrant, and there’s a mutual fuel-reduction effort done. If a low-value, small piece of private property is involved, then a land exchange proposal is more appropriate. (Individual, Libby, MT - #A2301.35200)

**1606. Public Concern: The Forest Service should allow private communities to construct buffer zones.****TO PROTECT PRIVATE PROPERTY**

Communities near roadless areas should build firebreak areas, clearing brush, planting lawns, etc. Private property owners should do the same. (Individual, No Address - #A23569.35230)

**1607. Public Concern: The Forest Service should consider ski areas located adjacent to communities as modifications supporting and complementing fire protection.****IN THE URBAN-FOREST INTERFACE**

The very nature of this category requires local jurisdiction. It is inconceivable that this issue could be properly handled, addressed, or otherwise considered at a national level. A more intensive vegetative management strategy surrounding communities is a necessity. Ski areas provide such an opportunity especially for those areas located adjacent to communities. Ski areas located adjacent to communities should be considered strategically placed modifications supporting or complementing fire protection measures in the Urban Wildland Intermix Zone. (Business, Mammoth Lakes, CA - #A30296.35000)

**1608. Public Concern: The Forest Service should not fragment roadless areas by constructing buffer zones.**

Roadless areas must not be fragmented by road building or firebreak building, but other firefighting techniques should be approved. (Individual, Port Angeles, WA - #A6179.35230)

**1609. Public Concern: The Forest Service should recognize that extensive vegetation management in forest-urban interface areas does not reduce potential home fire losses.**

Extensive wildland vegetation does not effectively change home ignitability. The evidence suggests that wildland fuel reduction for reducing home losses may be inefficient and ineffective. Inefficient because wildland fuel reduction for several hundred meters or more around homes is greater than necessary for reducing ignitions from flames, and ineffective because it does not sufficiently reduce firebrand ignitions.

To be effective, given no modification of home ignition characteristics, wildland vegetation management would have to significantly reduce firebrand production and potentially extend for several kilometers away from homes. To reliably map wildland-urban interface home fire loss potential, home ignitability must be the principal mapping characteristic.

The 1995 USDA Forest Service Strategic Assessment of Fire Management describes a costly, intensive and extensive wildland urban interface (WUI) hazard mapping and mitigation effort specifically for reducing home fire losses. As described, this approach is not necessary.

A WUI area could be a high priority for extensive vegetation management due to high aesthetic, watershed, erosion, or other values, but not for reducing potential home fire losses. (Organization, Spokane, WA - #A18013.35200)

**1610. Public Concern: The Forest Service should focus on other management activities besides urban-forest interface activities.****IN REGION 5**

Protection of home and property has been focused on urban interface in Region 5. In my opinion no protection for property and communities of rural nature has been provided for. They are being squeezed out by regulation and financial strangulation. I believe that many decisions that have been made in the recent past would not pass the test of being what a prudent man would do if [this] were his land. (Individual, Carson City, NV - #A21959.35130)

## *Urban-Forest Interface – Funding*

### **1611. Public Concern: The Forest Service should stop its misuse of the emergency fuels management funding earmarked for the urban-forest interface zone.**

#### ABUSE OF EMERGENCY FUNDS

Last year Congress appropriated an additional \$120 million for fuels reduction projects in the urban-wildland interface zone. Instead of directing resources to protect communities, however, the Forest Service is using emergency monies for large-scale commercial timber sales in the nation's most pristine forestlands, including roadless areas, old growth forests, and habitat critical to imperiled species—areas far from homes and businesses and at least risk of catastrophic wildfire. In testimony before Congress, the agency admitted that only 25 percent of the acres treated were in urban-wildland interface areas. (Individual, Washington, DC - #A30150.75610)

## *Public Collaboration*

### **1612. Public Concern: The Forest Service should work with local agencies to plan for and combat natural disasters near private property.**

How should communities and private property near inventoried roadless areas be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal lands? By working with local and federal agencies to plan for emergencies. (Individual, No Address - #A850.35000)

In the unlikely event that adjacent property is threatened by wildfire on Federal lands, the Forest Service should cooperate with state and local agencies to bring the fire under control. (Business, Palmer, AK - #A942.35200)

Communities and private property near roadless areas have a certain risk from wildfire — as they always have. We are not changing their risk level by NOT building more roads. Continued cooperation between the federal government and local entities should continue to reduce fire-loss risk. If fuel reduction is deemed necessary it should be done by aerial means. (Individual, Bozeman, MT - #A1134.35200)

#### **THROUGH LOCAL FIRE MANAGEMENT PLANS**

Private property is protected through the state forest fire protection program. The decision on whether to initiate aggressive fire management in non-roadless areas should be a component of the local fire management plan. (Individual, Lolo, MT - #A111.35200)

#### **THROUGH AN ESTABLISHED EDUCATIONAL PLAN**

The Forest Service should have an Educational Plan that is given to every resident in these surrounding areas and work with these communities to get them involved with the care and protection of the forest and their own properties. The Forest Service has done a superb job of protecting communities this year. (Individual, Lopez Island, WA - #A15240.35110)

#### **THROUGH FIRE PREVENTION SEMINARS**

The Forest Service should put on fire protection and prevention seminars with state, tribal and local leaders and fire personnel, involving homeowners and developers in risk areas. (Business, Mc Bain, MI - #A12006.30610)

#### **BY CONSULTING OFFICIALS IN NEW MEXICO AND MONTANA**

The Natural Resource Conservation Service employs an on-the-ground “work with” attitude that was once the norm within the Forest Service. The idea should be to cooperate with how local communities and/or states interact with healthy forests not after the fact of catastrophic natural events, but in

preparedness of such events. Areas in New Mexico such as Otero County and in Montana around the Bitterroot that have first hand experience with this point should be able to give the WO Forest Service employees real life scenarios on what property owners and the service can do in relation to forest management protocols. (Individual, Rock Springs, WY - #A15658.35210)

**1613. Public Concern: The Forest Service should work with other federal agencies to implement better land use planning.**

The US Forest Service needs to work with other federal agencies to implement better land use planning. Because local communities have failed so miserably at land use planning in this regard, federal guidelines are needed. (Individual, Victor, ID - #A20625.35210)

**1614. Public Concern: The Forest Service should keep a log of nearby property owners.**

**IN ORDER TO SEND THEM A LIST OF EMERGENCY CONTACTS**

It is their job to protect themselves really. They chose to live there. Give them what a lot of agencies have, keep their name and phone number on a permanent log that is updated every 2 years, send them a list of emergency phone numbers. (Individual, Yelm, WA - #A17978.35230)

**1615. Public Concern: The Forest Service should view private inholders as partners in forest stewardship.**

Private inholders should be seen as potential partners in forest and wildlife habitat stewardship. (Individual, Brimley, MI - #A3659.15111)

## **Responsibility for Protecting Private Property**

### **Summary**

**Responsibility of the Forest Service versus Private Property Owners** – Numerous respondents state that the Forest Service should take steps to protect private property from natural disasters. To that end, people suggest a number of actions the Forest Service could take—coordinating efforts with residential and rural firefighting teams; employing science-based management decisions; revising regulations and legal authority as necessary to secure timely measures; establishing quick response procedures; providing adequate maps of roadless areas; conducting an inventory of communities located near roadless areas; allowing forest management decisions to be made at the local level; enlisting the aid of the National Guard; enlisting the aid of Forest Service research stations; constructing roads for access; thinning dense stands near communities; carrying out prescribed burns; maintaining a ‘defensible space’ from the boundary of private property to the forest; prohibiting structures within 200 feet of private property boundaries; clearing hazardous materials near communities; creating jobs that enable people to remove fuelwood; and providing local water access for fire hoses.

A number of individuals also suggest the Forest Service should educate private property owners regarding the dangers that exist in roadless areas and the steps they should take to protect their property. One person suggests the Forest Service use *Living with Fire* as a guide in its education efforts, while another person suggests hiring displaced timber workers to train private property owners.

In addition to taking steps to protect private property and educating private property owners, one person suggests that forest managers should be held accountable for “decisions [regarding development in roadless areas] that create dangerous situations.”

Of those who specifically address the question of whether the Forest Service or private property owners should bear the responsibility for private property protection, most say it is private property owners that should bear the major responsibility. A typical comment is the following: “People should not build communities or buy property so near a national forest that they endanger their lives and property. If they do, they do so at their own risk.” Some suggested actions private property owners can take include clearing a safe area around their property, providing fire lookouts, establishing fire and rescue departments, and developing fire management plans and stricter building and zoning codes.

**Financial Responsibility** – Several respondents say the Forest Service should bear the financial responsibility for damages to private property. One individual states, “If the Forest Service acts irresponsibly and allows disease or insects to spread they should be ready to pay for the damage it does to the private property owner.” Another person concludes that the, “USFS must pay property owners full value for private property damaged by fire or other calamity originating in nearby National Forests, or if the property owner so requests, must rebuild damaged or destroyed property to original condition at USFS expense.” Still another respondent suggests that “the Forest Service should establish a trust fund to replace, in-kind, these property amenities.”

Some individuals suggest ways the Forest Service can help fund fire prevention efforts. One individual suggests that “the best way to protect people from wildfires is to develop a program where people are provided funding to clear out the fuels around their home.” Another individual recommends that “communities should get a royalty from the extractive industry to fund a safe community.” Finally one individual suggests that in the event of a natural disaster, federal funds should be used to “move people temporarily to safe areas . . . and to provide financial assistance in permanently relocating them to safer areas.” This individual states that it is more “cost effective . . . to adapt to nature” than to waste energy fighting it year after year.

Other respondents assert that private property owners, not taxpayers, should bear the financial responsibility for fire protection. According to one individual, “People who own private property near roadless areas should accept that fires are a risk of the location they have chosen.

Taxpayers’ dollars should not be spent to protect a handful of homes, or to stop a wildfire that is natural in occurrence.” Similarly, another individual states that “people who want to have a fire break between their house and an adjacent national forest should put one in their own land at their own expense, not go whining to the government to waste our tax dollars and our land to protect them from natural and predictable events.” To that end, one person suggests that “private property owners should be assessed an annual fee and a service charge when they call for assistance.” Another suggests that states raise property taxes for homes near forested areas to cover firefighting costs. According to others, private insurance companies should be encouraged to either increase rates or refuse coverage for homes built in locations at risk of wildfire, or offer reduced rates to those that meet fire danger reduction standards.

### *Responsibility of the Forest Service*

#### **1616. Public Concern: The Forest Service should protect private property from natural disasters.**

Homeowners who have built homes on private property and who pay taxes for fire protection should have their homes protected, regardless of location. Otherwise, they are being denied their rights. (Individual, Salt Lake City, UT - #A806.35000)

Because of the increased risk from wildfires caused by unmanaged fuel loads, the Forest Service has the obligation to fight both fires and epidemics near private property to assure they do not spread to private land. (Individual, Sandpoint, ID - #A5438.35210)

Communities private property near inventoried road areas should be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal land by, again, using helicopters. (Individual, No Address - #A536.35000)

#### **AFTER DETERMINING THE RISK INVOLVED**

Each situation is different and needs to be evaluated as such. What the risk involved is, needs to be determined before communities' private property are protected from wild fires. (Individual, Vancouver, WA - #A389.35000)

#### **THROUGH COORDINATION BETWEEN RESIDENTIAL AND RURAL FIRE-FIGHTING TEAMS**

Coordination between residential and rural firefighting teams is in order too. (Individual, Olympia, WA - #A20844.35000)

#### **THROUGH SCIENCE-BASED MANAGEMENT DECISIONS**

The Forest Service, at the local level, must make science-based management decisions that minimize the risk of catastrophic wildfires on neighboring forests, inholdings, and communities. Some of these decisions may require temporary roads. The January 2001 RACR could overly restrict science-based solutions to local problems. (Individual, Logan, UT - #A13482.35110)

#### **BY REVISING REGULATIONS AND LEGAL AUTHORITY AS NECESSARY TO SECURE TIMELY MEASURES TO PROTECT PRIVATE RESOURCES**

When it is necessary to respond to catastrophic events such as lethal, stand replacement fires, flash floods, water contamination, or others, time is of the essence. After a catastrophic event has occurred, is not the time to attempt resolution through arguments, appeals, and lawsuits. I believe that revision of regulations and modification of legal authority are necessary to secure timely measures to protect both private and public resources. (Individual, Colfax, WA - #A5421.35000)

#### **BY ESTABLISHING QUICK RESPONSE PROCEDURES**

I am an owner of land adjoining the Gallatin National Forest. In 1994 over half (about 1200 ac.) of my ranch was burned by fires sweeping from the Federal Land (The Black Butte Fire in Sweetgrass County, Montana). It was disappointing and disastrous that when the fire was just starting the local Big Timber Volunteer Fire Dept. was not able to drive to the fire and could have put it out, but were ordered not to, as it was on federal land and there was a liability issue. As a result, because of slow response by the federal government, and firefighters who did not know which township they were in, and abandonment of the initial fire with no safety net of a hand or machine line (all the crew left to save a barn.), the wind changed, and 11,000 acres burned, mostly private land.

The above explanation is to show that roads and quick response, even if it means deputizing local forest fighters could save private property. (Individual, Bozeman, MT - #A8826.30400)

#### **BY PROVIDING ADEQUATE MAPS OF ROADLESS AREAS**

Forest managers do have a responsibility to manage our national forests. But in carrying out those responsibilities, they must consider the impact those policies have on those living in close proximity to our national forests. Providing accurate mapping of roadless areas is a key ingredient to ensuring that communities and forests can coexist safely for all concerned. (Organization, Huntsville, AL - #A13542.35113)

#### **BY CONDUCTING AN INVENTORY OF COMMUNITIES LOCATED NEAR ROADLESS AREAS**

The Forest Service, working in concert with other fire fighting organizations, should first determine where such communities and property exist. Without such an inventory it is difficult to determine appropriate strategies and attendant costs. (Individual, No Address - #A12607.35200)

**BY ALLOWING FOREST MANAGEMENT DECISIONS TO BE MADE AT THE LOCAL LEVEL**

The USFS can best protect communities and private property near inventoried roadless areas by considering both economic and physical impacts of management decisions. Many communities and individuals depend on the sustainable use of these lands for their livelihood, and the USFS must give these national forest neighbors meaningful opportunities to comment on decisions about federal lands that may place them in economic or physical peril. Again, forest management decisions made on the local level are best suited to protecting adjacent rural communities, as they are more likely to have sufficient management flexibility to respond to emergencies and changed conditions. (Association, Sacramento, CA - #A3681.35110)

**BY ENLISTING THE AID OF THE NATIONAL GUARD**

*How should communities and private property be protected from wildfires on adjacent federal lands?*

Through trained Forest Service personnel, available army reserves and national guard, local fire service, police, etc. paid for with proceeds from the Emergency Management System, State and Federal reserves from sales of natural resources, insurance policies on projects that are casual, and use permits of resource lands. (Individual, Lacey, WA - #A17762.35000)

**BY ENLISTING THE AID OF FOREST SERVICE RESEARCH STATIONS**

The Forest Service Research Stations can play a role in reducing problems in the interface between roadless areas and neighboring state, tribal, community or private developments by conducting scientific research in ways to reduce risks. (Individual, Asheville, NC - #A22623.35210)

**BY ALLOCATING RESOURCES**

Fire fighting resources should be allocated heavily in favor of protecting forests close to towns and private property. Most of these areas are roaded and not covered under this plan. (Individual, Lehi, UT - #A568.35000)

**BY MANAGEMENT ACTIVITIES**

I believe that some thinning of areas near private property is prudent along with controlled burns to reduce the fuel load. (Individual, Missoula, MT - #A113.35000)

Protecting property, communities and homes are important. The underbrush and small trees should be thinned to reduce possibility of the ladder effect that causes crown fires that are almost impossible to control. (Individual, Coulterville, IL - #A114.35000)

Communities and private property near roadless areas are the areas most in need of fire protection work such as thinning, etc. (Individual, Coram, MT - #A539.35000)

Management of national forests should not pose risks, if possible, to adjacent private lands or communities. Therefore, management activities should be accomplished that reduce risks of catastrophic wildfires and insect and disease infestations. The Forest Service must analyze potential impacts on communities and private property and these communities and private owners must be provided opportunities to comment on decisions about federal lands that might place them at increased risk. (Individual, Thousand Oaks, CA - #A891.35000)

**BY CONSTRUCTING ROADS FOR ACCESS**

The Roadless Area Conservation Rule already provides exceptions that allow road building and logging when needed to address concerns of wildfires and forest health. Roads can be built to protect public health and safety from imminent wildfire threats and other emergencies. (Individual, Logan, UT - #A939.35000)

In instances where human life and property is threatened by keeping an area roadless, build roads. (Individual, Fayetteville, AR - #A1015.35000)

Roads can still be built to protect life or property. (Individual, Duluth, GA - #A3724.35000)

I understand how difficult it is to balance this issue, however, I also understand that the protection of communities and other private property should be but one factor in determining the way an event is dealt with. If this is at the expense of an area remaining roadless, so be it, an adequate number of temporary roads should be constructed to fight the fire, or insect infestation, or whatever. These roads can then be decommissioned and restored to their natural state at a later date or utilized as recreational infrastructure. We should be clever enough to remain somewhat fluid in how all our public lands are utilized, if a particular tract is no longer suitable for so-called "roadless" status perhaps it should be allowed to be used for other purposes. (Individual, El Dorado, KS - #A5117.35000)

#### **BY CONSTRUCTING TEMPORARY ROADS FOR ACCESS**

National Forests should be managed to be assets to the community, not liabilities. Protection of communities and other private property should be the primary factor in determining the way a fire is fought. If required to accomplish such protection, a minimum number of temporary roads should be constructed to fight the fire. These roads can be decommissioned and restored to their natural state later. Then, mitigation measures that address flash flood, mudflows and water contamination should be implemented quickly following wild fires. (Individual, Edgewood, NM - #A5638.35000)

#### **BY THINNING DENSE STANDS NEAR COMMUNITIES**

How should communities and private property near inventoried roadless areas be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal lands?

Thin unnaturally dense stands near communities, but do not remove old-growth timber, only underbrush and small trees. (Individual, Dallas, TX - #A18002.30530)

#### **BY REINTRODUCING FIRE**

Owners of land adjacent to the national forest assume some risks as well as receiving a great deal of benefit. In many cases these landowners purchase this land just for the fact that it does lie adjacent to the national forest. Roding the existing roadless areas would not necessarily protect these lands and in many cases would actually detract from the values that the adjacent landowners have sought out. Roadless lands actually offer us our best opportunity for emulating natural fire processes without the threats to human habitation and other costly human development. By allowing the reintroduction of fire into these systems we can protect nearby landowners to a reasonable level. (Individual, Moscow, ID - #A4871.35100)

#### **BY PRESCRIBED BURNS**

To protect homes from the unlikely event of a forest fire near roadless areas, perhaps the Forest Service can create a program for prescribed burns in those areas where excess fuel loads appear to be a problem. This may also maintain forest health. (Individual, Colorado Springs, CO - #A17259.35000)

#### **BY MAINTAINING A 'DEFENSIBLE SPACE' FROM THE BOUNDARY OF PRIVATE PROPERTY TO THE FOREST**

The Forest Service should maintain a "defensible space" on the public lands from the boundary of the private land back into the forest.

They should consistently encourage private landowners to maintain their own defensible space around their structures. (Association, Cody, WY - #A41559.35100)

#### **BY ZONING AND PROHIBITION OF STRUCTURES WITHIN 200 FEET OF PRIVATE PROPERTY BOUNDARIES**

Pre-emptive measures should be taken to prevent damage on private properties. Some examples are, through zoning, and no structures should be erected within 200 feet of property boundary. (Individual, No Address - #A5395.35000)

Protection of adjacent lands can be achieved through intelligent planning and zoning of private and public lands. (Individual, Missoula, MT - #A6193.35000)

**BY CLEARING HAZARDOUS MATERIALS 200 METERS FROM COMMUNITIES**

Forest treatment beyond the immediate area surrounding houses has little effect on community protection from wildfire. However, an intensive zone 200 meters (660 feet or one-eighth of a mile) around communities can provide a defensible space and a potential fire line for firefighters. Treatment of the buffer areas should include the removal of ladder fuels (primarily smaller trees) and general fuels reduction. A light treatment for up to a .5-mile from urbanized areas may be appropriate. Larger trees, especially those in the ponderosa pine forests, have shown resistance to fire. (Organization, Chico, CA - #A25114.35200)

**BY CLEARING HAZARDOUS MATERIALS 40-100 METERS FROM COMMUNITIES**

The current proposed Roadless policy allows roads to be built in roadless areas to protect life or property. All the current research points to the areas WITHIN the first 40-100 meters surrounding a community as the place where clearing to prevent fires should be concentrated. (Individual, Nevada City, CA - #A11787.35000)

**BY CREATING JOBS THAT ENABLE PEOPLE TO REMOVE FUELWOOD**

If necessary, in roadless areas close to habitations, jobs could be created by sending people in without roads to remove fuel-wood. (Individual, Sitka, AK - #A15506.35200)

**BY PROVIDING LOCAL WATER ACCESS FOR FIRE HOSES**

I believe that building regulations would address this problem. For instance, homes in these areas would benefit from not having wooden roofs. There should be a perimeter of non-dense forest around the home, but not necessarily a clear-cut. There should be local water access for fire-hoses. (Individual, Klamath Falls, OR - #A6931.35200)

**FOR HOMES THAT EXISTED PRIOR TO INCLUSION IN THE NATIONAL FOREST SYSTEM**

In cases where communities or individual homes existed prior to their neighboring lands being included in the National Forest system, reasonable efforts should be taken to assist in maintaining buffer zones to inhibit the spread of fires into inhabited territory. (Individual, New Haven, CT - #A616.35000)

**ON THE LITTLE MISSOURI NATIONAL GRASSLANDS**

We live adjacent to the Little Missouri National Grasslands and expect the Forest Service to be a good neighbor and manage it properly so it does not jeopardize our personal property and personal safety. A response plan should be implemented to effectively deal with the potential for wildfires, disease, etc. (Association, Watford City, ND - #A29131.35000)

**AT THE BRUNDAGE MOUNTAIN SKI RESORT**

The forest planning process may need to provide exceptions to roadless area prescriptions in order to provide for circumstances of this nature. In many cases, such as ours, ski resorts are private improvements located on federal lands that need fire protection. Indeed, the Forest Service has historically provided fire suppression in the event of natural fires within and adjacent to Brundage Mountain and we would like to see this practice continues. (Permit Holder, McCall, ID - #A15317.35210)

**1617. Public Concern: The Forest Service should educate private property owners regarding the dangers that exist in roadless areas.**

Communities must protect themselves economically, the only thing the forest service can do is to educate the public about various perils. (Individual, Fruita, CO - #A1680.35113)

**AND THE STEPS THEY SHOULD TAKE TO PROTECT THEIR PROPERTY**

People in these areas should be educated about how to protect the area they live in, how to minimize the risk of dangerous fires and what to do and who to call if a fire should break out. (Individual, Shawnee Mission, KS - #A96.35113)

Ideally people should be supplied with a notice warning them about the increased risk of fire due to their choice of location before they buy a home. All property owners should receive documentation on how to best protect their property such as using fire resistant roofing materials, type and closeness of vegetation near their homes, etc. Determine levels of protection depending on density of population. An isolated home, regardless of value, should not be given the same level of protection as a densely packed community. The bottom line is always risk vs. reward. (Individual, Tucson, AZ - #A4938.35113)

I also have to ask the question of what communities and homeowners can do to protect themselves from the ravages of fire. They should treat their community and private properties by thinning and removing small trees and all underbrush from their properties at a minimum of at least 500 feet or more. Roofs and gutters should be free of flammable material such as leaves and pine needles. Nothing flammable should be close to a structure. (Individual, Coulterville, IL - #A114.35000)

Remind homeowners that they are responsible to harden their properties against wild fires. They must: a) use metal or tile shingles, b) use metal or concrete containing siding, c) keep brush away from their homes, d) keep trees away from homes, e) keep water on-hand to fight fires. (Individual, Olympia, WA - #A441.35000)

A landowner who purchases or acquires property anywhere near federal forests and grasslands should know the risks and take measures to reduce wildfire damage to their property. USFS research by fire physicist Jack Cohen shows clearly that structures can be most effectively and efficiently protected from fire by working within the structure's defensible space zone. This is within 25 meters from the house. (Individual, Grangeville, ID - #A830.35000)

The Forest Service should also have an aggressive program to work with local home owners on ways to protect their homes, like removing dead and dying trees, maintaining a "green area" within 30-50 feet of the home, and having a metal roof. (Elected Official, Fremont County, ID - #A4942.35200)

#### **BY USING LIVING WITH FIRE AS A GUIDE**

According to the Forest Service, protection from wildfire is best achieved by managing the vegetation immediately surrounding structures. The Forest Service could therefore provide education to nearby property owners on ways to protect themselves with roof sprinklers, and defensible space. In Minnesota, wildland firefighting agencies developed a guide for homeowners called Living With Fire. The guide describes the forces that determine wildfire behavior and lists specific steps to creating an effective defensible space around homes. (Individual, Grand Marais, MN - #A15355.35113)

#### **BY HIRING DISPLACED TIMBER WORKERS TO TRAIN LANDOWNERS**

Hire displaced timber workers to train folks living in the wildland/urban interface how to reduce fire hazards around their homes. (Individual, No Address - #A26979.35220)

### **1618. Public Concern: The Forest Service should protect federal property with private improvements from natural disasters.**

#### **SKI RESORTS**

Federal property with private improvements, like those at ski areas need protection from risks associated with natural events just as private property owners do. The agency should have the flexibility to prevent and control fires in adjacent areas and should consider a less rigorous ban on road building in roadless areas adjacent to private property and communities. (Permit Holder, Denver, CO - #A15385.35210)

### **1619. Public Concern: The Forest Service should hold forest managers accountable for decisions that create dangerous situations.**

Forest Service managers are not thinking coherently about development and fires. For example, the Targhee National Forest is attempting to create a private inholding at Grand Targhee resort through a

federal land exchange. This private inholding would be completely surrounded by forests, 7 miles within the forest boundary by road and many more miles from county fire-fighting equipment. When others and I raised the issue of risk to this new development from wildfire, the Targhee simply dismissed our concerns both during the EIS process and in our appeal of the decision to privatize Grand Targhee. Forest managers lack accountability for decisions that create dangerous situations. Regional foresters just close their eyes to the problem. (Individual, Victor, ID - #A20625.35210)

## *Responsibility of Private Property Owners*

### **1620. Public Concern: Private property owners should be responsible for protecting their property from natural disasters.**

People should not build communities or buy property so near a national forest that they endanger their lives and property. If they do, they do so at their own risk. National forests were not created to accommodate communities or private property owners. They were created to preserve the national interest by providing unspoiled, undeveloped natural areas for all Americans, not just the few who financially profit from their proximity to national forests. (Individual, Ennis, MT - #A102.35000)

Property owners near roadless areas should accept the risk of living in such a vulnerable area and take responsibility for their own. Better yet, they should be encouraged to live in town. (Individual, Bozeman, MT - #A284.35000)

Communities and private landowners can fend for themselves. They need to be proactive in preventing risk and fire danger for themselves. They are aware of the risks when involving themselves in nearby roadless areas. (Individual, Missoula, MT - #A394.35000)

#### **BY DIGGING TRENCHES AROUND THEIR PROPERTY**

Private property owners (by definition) should be responsible for protecting their properties by modifying their own lots if they so desire. Many private residences bordering forests in the upstate NY area use lot-edge trenching to prevent fire spreads. Such trenches should be suggested to land owners, but should be done on the private lands, by the lot owner. (Individual, Rochester, NY - #A8831.35230)

#### **BY PROVIDING FIRE LOOKOUTS**

Communities and private properties near inventoried roadless areas can best protect themselves by maintaining adequate fire stations and lookouts, and access to dependable water resources. There is always fire danger associated with living near or in the forest. The potential for harm or destruction can never be entirely eradicated. Proper creation and maintenance of firebreaks, a sound emergency and fire protection plan, and a dependable water source, provide as much protection as possible to create in forests. (Individual, Chewelah, WA - #A5453.35230)

#### **BY ESTABLISHING FIRE AND RESCUE DEPARTMENTS**

Local communities should be properly protected from the hazards associated with living in these areas by proper management. If item number three is carried out properly, the only danger will be acts of nature. The communities should be properly insured and have a well-maintained fire and rescue department. This can be accomplished by their individual mechanisms. (Individual, Boulder, CO - #A5288.35000)

#### **BY DEVELOPING FIRE MANAGEMENT PLANS AND STRICTER BUILDING AND ZONING CODES**

Local communities must have their own fire management plan. More responsibility, accountability for fire prevention and invasive species must be placed on the owners of private lands. Local laws need to coincide with these responsibilities such as no wood roof in the forest, no building in a flood plain, etc. (Organization, Reno, NV - #A5987.35220)

**1621. Public Concern: The Forest Service should allow private property owners to clear a safe area around their property.**

Private property owners should be allowed to clear a safe area around their property, if desired, to provide protection from wildfires. (Individual, Albuquerque, NM - #A10497.10135)

**UP TO 100 YARDS AWAY**

I do have some green timber left. Because of the rough terrain, I would have to enter the forest perhaps 100 yards to reach a point where I could come back into my property in order to harvest the trees. I think permission should be given to private forest owners, to do this. (Individual, Bozeman, MT - #A8826.40000)

*Financial Responsibility***1622. Public Concern: The Forest Service should pay for damages to private property if they allow disease or insects to spread.**

Spraying can be done at the first outbreak of insects or disease to minimize the spread to forests and private lands. If the Forest Service acts irresponsibly and allows disease or insects to spread they should be ready to pay for the damage it does to the private property owner. (Individual, Oak City, UT - #A40530.30600)

**1623. Public Concern: The Forest Service should pay private property owners for property damaged by wildfire.**

USFS must pay property owners full value for private property damaged by fire or other calamity originating in nearby National Forest, or if the property owner so requests, must rebuild damaged or destroyed property to original condition at USFS expense. This USFS insurance requirement also must include death, damage and injury caused to people, property or livestock, by wild animals and diseases which emerge from National Forest land. (Individual, Fredericktown, MO - #A11981.35230)

**1624. Public Concern: The Forest Service should provide funding to private property owners.****TO CLEAR FUELS AROUND THEIR HOME**

The best way to protect people from wildfires is to develop a program where people are provided funding to clear out the fuels around their home. This is best seen in the Conservation and Local Economy Alternative provided on the Bitterroot National Forest in response to their Burned Area Draft Environmental Impact Statement. Non-Commercial thinning in the urban/rural interface should be determined by local scientists. (Individual, Missoula, MT - #A21068.35100)

**1625. Public Concern: The Forest Service should provide royalties from extractive industries to communities near roadless areas.**

Private landowners elected to buy land there next to a forest should take precautions to protect their own lands. Communities should get a royalty from the extractive industry to fund a safe community. (Individual, Mesa, AZ - #A99.35230)

**1626. Public Concern: The Forest Service should use federal funds to relocate private property owners to safe areas.****IN THE EVENT OF A NATURAL DISASTER**

Regarding the threat to people and property posed by natural disasters, such as wildfires, we should use federal funds to move people temporarily to safe areas in the case of such events, and to provide financial assistance in permanently relocating them to safer areas. Our experience with the Mississippi floodplain has shown that it is cost effective, as well as simply wise, to adapt to nature, rather than waste

our energies countering elemental realities that will return year after year. (Individual, Washington, DC - #A27348.35210)

**1627. Public Concern: Private property owners, not taxpayers, should bear the cost of fire protection.**

Homeowners and other property owners within National Forests should bear some if not all of the expense associated with fire protection of their own property, as are property owners in other parts of the country. Local people must be treated respectfully as neighbors, but they are not landlords. (Individual, Skokie, IL - #A529.35230)

The best way to prevent the urbanization of roadless areas is to require risky property owners to assume the risks. We don't need another Federal welfare program for landowners such as coastal and wetland settlers receive! (Individual, North Little Rock, AR - #A814.35230)

People who own private property near roadless areas should accept that fires are a risk of the location they have chosen. Taxpayers' dollars should not be spent to protect a handful of homes, or to stop a wildfire that is natural in occurrence. (Individual, Portland, OR - #A967.35230)

Communities are not typically adjacent to national forest roadless areas, so they do not require special protection from fire and other events. Private lands are, in fact, private. Special fire protection, and the resultant costs, should be left to the individuals and/or corporations who own those lands. (Individual, Bozeman, MT - #A3673.35230)

People who want to have a fire break between their house and an adjacent national forest should put one in their own land at their own expense, not go whining to the government to waste our tax dollars and our land to protect them from natural and predictable events. (Individual, West Lebanon, NH - #A4836.35130)

**1628. Public Concern: The Forest Service should charge private property owners an annual fee and service charge for assistance.**

I think private property owners should be assessed an annual fee and a service charge when they call for assistance. (Individual, Las Vegas, NV - #A5429.35200)

**1629. Public Concern: States should raise property taxes for homes near forested areas.**

**TO COVER FIRE FIGHTING COSTS**

The states should develop a way to better prepare their landowners for inevitable fires. They could, for example, develop a property tax scheme that would charge higher taxes for homes near forested areas to cover the higher fire fighting costs for those areas. They could also mandate fire insurance for all homeowners in a forested area. (Individual, No Address - #A29243.35120)

**1630. Public Concern: The Forest Service should encourage private insurance companies to either increase rates or refuse coverage for homes built in locations at risk of wildfire.**

There should be free market solutions to many of the problems created by homes being built in locations that are subject to high wildfire danger. Private fire insurance should either be very expensive or simply not available to those who wish to build in locations that have a very high risk of being destroyed by wildfire, either through remoteness or through their lack of typical fire protection such as distance from a fire department and access to water supplies, etc. At the very least there should be a determination by

local fire officials as to whether or not the structures can be defended without jeopardizing either men or equipment prior to an emergency. (Individual, West Yellowstone, MT - #A6043.35130)

**1631. Public Concern: The Forest Service should encourage fire insurance carriers to offer reduced rates to those that meet fire danger reduction standards.**

Encourage fire insurance carriers to offer reduced rates to homes that meet fire danger reduction standards. It's just crazy to offer the same rates to people with flammable and inflammable siding and roofs! (Individual, Olympia, WA - #A441.35000)

The Forest Service could seek the cooperation of insurance companies to reduce premiums for owners who reduce risk. National forest land in the urban interface should be made as fire resistant as practical to do so. (Individual, Missoula, MT - #A4987.35200)

*Other*

**1632. Public Concern: Organizations opposed to access to roadless areas should protect communities and private property and assume liability for any loss.**

Protection of nearby communities and private property should be provided by the Sierra Club and all others opposed to any trespassing of inventoried roadless areas, and be held liable for lost lives and lost property. (Individual, Fremont, MI - #A10610.35000)

## Protecting Access to Property (Question 5)

**Question 5: Protecting Access to Property. What is the best way to implement the laws that ensure states, tribes, organizations, and private citizens have reasonable access to property they own within inventoried roadless areas?**

This section includes five subsections: Protecting Access to Property General, Access to National Forest System Lands Through Private Property, Maintenance of Routes through National Forest System Lands to Private Property, Legal Considerations, and Land Exchanges/Purchases.

### Protecting Access to Property General

#### Summary

**General Comments** – One individual suggests that in order to preserve access to private property, property boundaries must first be established; hence, the U.S. Department of the Interior and Bureau of Land Management should survey the boundaries of private and federal property to establish adjoining boundaries. Beyond this technical suggestion, a number of respondents urge the Forest Service to ensure access to private property—through the forest planning process, through special use permits, or on a case-by-case basis. One association requests that any revisions to regulations not result in undue delays in access decisions, stating that “it has taken over two years for the Forest Service to issue a Road Use Permit to allow the use of three miles of existing Forest Service road on the Medicine Bow NF to access a timber sale in a State of Wyoming section inside an inventoried roadless area.”

Others ask the Forest Service to notify private property owners when considering changes that could affect access to their property; to ensure that properties for sale are guaranteed access; to address access to parcels not presently accessible by road; and to oversee local residential access decisions in order to ensure compliance with statutory federal residential requirements, protections, and planning processes.

Some individuals also ask the Forest Service to spell out conditions of ingress and egress in forest plans, and to require private property owners to prevent interloping along routes of ingress and egress to their property. Additionally, one person comments that “property ownership does not bestow [on] owners a right to conduct activities on their lands in conflict with, or to the detriment of, adjacent ownerships,” and urges the Forest Service not to allow such activities.

**Roadless Area Management** – A number of comments about access relate directly to roadless area management—specifically in connection with the Roadless Area Conservation Rule. Both a state agency and a professional society ask the Forest Service to address, on a forest-by-forest basis, the potential impacts of roadless area management on access to other public and private lands. At the same time, several individuals make a point of saying that the Rule would have no impact on access to state and private inholdings because access is already protected by existing

law. Some point to the provision in the Rule which provides exceptions to the prohibitions on road construction when necessary to maintain access to inholdings, and urge the Forest Service to retain that provision.

Others assert that the exceptions allowed in the Rule are not sufficient, and so urge the Forest Service to address the Rule's adverse impacts on private property access, or to revise the Rule to ensure that reasonable access routes to private property are maintained.

### **1633. Public Concern: The U.S. Department of the Interior and Bureau of Land Management should survey the boundaries of private and federal property.**

#### **TO ESTABLISH ADJOINING BOUNDARIES**

All owners of private property must have access to their property. State law should prevail as individuals must allow other individuals access to their property, no fee should be charged. Property boundaries must be surveyed by the US Department of the Interior and BLM to establish all corners joining private and federal property; this is a continuing problem in our area. (Individual, Mount Ida, AR - #A13372.40000)

### **1634. Public Concern: The Forest Service should ensure access to private property.**

#### **THROUGH THE FOREST PLANNING PROCESS**

The best way to ensure that States, tribes, and private citizens have reasonable access to property they own in roadless areas is through the forest planning process. Those routes of concern should be identified and protected through forest-wide goals, objectives and standards. The lands to be protected, and the access to them, should be clearly identified on the preferred alternative map. Those roads then become part of the road management system for the Forest. (Elected Official, Fremont County, ID - #A4942.40100)

#### **THROUGH SPECIAL USE PERMITS**

Why shouldn't we the people be able to use the forest areas? Forest planning may have failed to provide adequate protection of roadless areas in the past that proves we need improvement and a way to regulate such areas. The best way to implement the laws that ensures States, tribes, organizations, and private citizens have reasonable access to property they own is to design a use permit and use that money to cover the cost of policing the area. (Individual, No Address - #A4764.40000)

Establishment documents for Roadless Areas should contain identification of access routes and specifications for their development and use. If access will not be permitted then the holdings should be acquired by the government through negotiation or in the extreme, condemnation. The inholder should be compensated. The existing Special Use Permit system of the Forest Service should be adequate for these access situations. (Individual, Olympia, WA - #A278.40500)

#### **ON A CASE-BY-CASE BASIS**

You must provide reasonable access to private and other lands adjacent to or within the inventoried roadless areas. If you can't do this and maintain a unit's roadless character, it should not be managed as roadless. What constitutes reasonable access must be negotiated with each landowner. The issue of access to other properties must be addressed on a case-by-case basis in forest plans. (Individual, Lewiston, ID - #A2872.40000)

### **1635. Public Concern: The Forest Service should avoid additional delays regarding decisions on access to private property.**

Because of delays associated with Forest Service roadless policies, it has taken over two years for the Forest Service to issue a Road Use Permit to allow the use of three miles of existing Forest Service road

on the Medicine Bow NF to access a timber sale in a State of Wyoming section inside an inventoried roadless area. This is inexcusable. Any revision of the regulation should not result in any additional potential delays for decisions on rights-of-way or access to private property. (Association, Augusta, ME - #A13312.40000)

**1636. Public Concern: The Forest Service should notify private property owners when considering changes that could affect access to their property.**

**TO ALLOW PROPERTY OWNERS TO ASCERTAIN THE IMPACTS OF ROAD POLICIES**

Owners of private inholdings must be specifically notified in writing, including maps with adequate detail, whenever the Forest Service considers changes which could affect access to or the values of their private properties. General notification procedures and practices are not adequate. They do not relate to specific situations and the Forest Service personnel who make these presentations, field comments, and attempt to answer questions have little knowledge of policies and procedures as they would apply to and affect specific inholdings. This has resulted in the inability for the owners of inholdings, like us, to accurately ascertain potential impacts of any road policies, procedures or proposals. Additionally, actual and existing road status information needs to be maintained and made available to interested and affected parties. Our experience is that this is not currently the case. (Individual, Lancaster, CA - #A18019.40000)

**1637. Public Concern: The Forest Service should spell out conditions of ingress and egress in forest plans.**

Access to private property should be subject to the same ridiculous, discriminatory laws that apply to wilderness areas. Reasonableness and common sense in determining the least impact on federal lands is the least cost to the land owner. The forest plan should spell out conditions of ingress and egress. (Business, Eureka, MT - #A17220.20400)

**1638. Public Concern: Local governments should ensure that properties for sale are guaranteed access.**

It is the responsibility of local governments to conduct land use planning that ensures properties for sale are guaranteed access. (Individual, No Address - #A27789.40100)

**1639. Public Concern: The Forest Service should address access to parcels not presently accessible by road.**

**ON A CASE-BY-CASE BASIS**

As I have reviewed the government maps of the federal lands around us here in Gunnison, I notice many parcels that are not accessed by roads, these parcels seem to have been purchased for mineral rights, grazing, spring access, etc. Access to these lands will need to be provided on a parcel-by-parcel basis. These decisions can be made by the local boards in connection with the owner, and all interested parties. Special education on the problems presented by access plans and requests should be given by the USDA foresters working in the area. (Individual, Gunnison, UT - #A25755.40000)

**1640. Public Concern: The Forest Service should oversee local residential access decisions.**

**TO ENSURE COMPLIANCE WITH STATUTORY FEDERAL RESIDENTIAL REQUIREMENTS, PROTECTIONS, AND PLANNING PROCESSES**

In the final proposed rule I hope you include extremely limited, or no, unguided local control for FS residential access decisions. Local control has meant no viable appeal to local FS actions. The local FS has minimal consultation with affected populations. The local FS is severely out of sync with other statutory federal residential requirements, protections and planning processes. Residential use is not the

FS's forte, yet it is important to residents that lawful and reasonable review of decision making prevail, even in the forest. (Individual, Prescott, AZ - #A28094.13120)

**1641. Public Concern: The Forest Service should require private property owners to prevent interloping along routes of ingress and egress to their property.**

Political and private interests who own land within inventoried roadless areas should have access but should bare the entire burden of ensuring that public lands are protected from interlopers along routes of ingress and egress to their properties. (Individual, Olympia, WA - #A10330.40000)

**1642. Public Concern: The Forest Service should ensure that private property owners do not conduct activities that harm adjacent ownerships.**

Property ownership does not bestow owners a right to conduct activities on their lands in conflict with, or to the detriment of, adjacent ownerships (i.e. hazardous waste management facilities erected adjacent to residential areas or access roads constructed across the public's roadless areas). (Individual, Kennewick, WA - #A23359.40100)

**1643. Public Concern: The Forest Service should allow the advocates of non-wilderness use to compete for access to privately held lands.**

The competition is over, and the advocates of non-wilderness uses of our National Forests have already mostly won. Preserve the remaining roadless areas as wilderness and allow the advocates of non-wilderness uses to compete for access to the majority of Forest Service land which remains unprotected. Calling these resources "limited" is misleading in this context. There are very few limits placed on the motorized recreation and resource extraction contingents in this competition. The majority of Forest Service land is open to these uses. Tracts of public land dwarfing the Forest Service holdings were granted to private interests in the last century—very little of which remains roadless. Allow the advocates of non-wilderness uses to compete on the free and open market for access to this privately held land rather than asking all Americans to, yet again, pick up the tab. (Individual, Seattle, WA - #A21681.15160)

### *Roadless Area Management*

**1644. Public Concern: The Forest Service should address, on a forest-by-forest basis, the potential impacts of roadless area management on access.**

**TO OTHER PUBLIC AND PRIVATE LANDS**

The potential impacts of known forest health problems, fuel load problems, and fire suppression needs on adjacent landowners must be considered in the development of roadless area management decisions. The Forest Service must also address, on a forest by forest basis, the potential impacts of roadless area management on access to other public and private lands as well as to water supplies for operations, maintenance and public safety concerns. Similarly, diminished water yields and potential water quality problems associated with catastrophic wildfires must also be rectified. (State Agency, Denver, CO - #A2332.30200)

The Forest Service must address, on a forest-by-forest basis, the potential impacts of roadless area management on access to other public and private lands. Although it might seem an obvious consideration to account for, the original scoping roadless policy document lacked strong assurances and safeguards for in-holding access. The final policy adopted a more positive approach, but still left much to be desired in terms of process. (Professional Society, No Address - #A29920.40100)

**1645. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule has no impact on access to state and private inholdings.**

The Roadless Area Conservation Rule has no effect on access to state and private land inholdings. Roadless areas are no different from any other national forest lands regarding inholding access. The Bush administration should not be perpetuating the myth that the Rule denies access to property inholdings. (Individual, Denver, CO - #A4524.40000)

The Roadless Area Conservation Rule won't affect access to inholdings owned by states, tribes, organizations, and private citizens. Inholding access is the same on roadless areas as it is on other national forest lands. Despite the Bush Administration's claims, it's a myth that the Roadless Rule denies access to property inholdings. (Individual, Hewlett, NY - #A4748.40100)

**BECAUSE ACCESS IS ALREADY PROTECTED BY EXISTING LAW**

One of the points being raised by the current Administration is the issue of access to private and state lands through national forest lands. This issue is a false issue. Access is protected by current laws, already on the books, and has no bearing on the current roadless area designations. (Individual, Jackson, WY - #A1719.40100)

**1646. Public Concern: The Forest Service should retain the provision in the Roadless Area Conservation Rule which provides exceptions to the prohibitions on road construction when necessary to maintain access to inholdings.**

The Roadless Area Conservation Rule currently has a provision that provides exceptions to the prohibitions on road construction to assure access to state, tribal, and private lands across inventoried roadless areas. It states that road construction is allowed when a road is needed pursuant to reserved or outstanding rights, or as provided for by statute or treaty. We support retention of this provision of the Roadless Area Conservation Rule. This provision may be clarified with language that specifically includes access to state, tribal, and private lands across roadless areas. (Individual, Asheville, NC - #A22623.40000)

**1647. Public Concern: The Forest Service should revise the Roadless Area Conservation Rule.**

**TO ENSURE THAT REASONABLE ACCESS ROUTES TO PRIVATE PROPERTY ARE MAINTAINED**

The state understands that the Roadless Rule is written as a blanket prohibition, with some exceptions allowed. However, the exceptions do not cover future activities, only existing rights. Second, and more importantly, the state does not believe that the exceptions, as written, will have the desired effect. For example, law and equity require access to inholdings within the forest. If the owner of an inholding desires access to the land, the Forest Service is obligated to allow the most reasonable route, considering environmental and economic factors. Unfortunately, rather than do this, which may require consideration of a new or reconstructed road, the tendency will be, borne out by years of experience, to strongly suggest that, because this is a "roadless" area, the ownership of the inholding be transferred to the Forest Service in some manner. Second, even if this is not the case, the most reasonable access may not be the most direct, and may have to be routed in order to avoid topographic features, such as cliffs. The Rule does not indicate any such criteria, or allow for such processes of review. (State Agency, Salt Lake City, UT - #A20742.40000)

**1648. Public Concern: The Forest Service should identify roadless areas in private property deeds.**

Roadless areas must be designated in the deed to the land so that all know what they are involved with. (Individual, Birmingham, AL - #A1111.40000)

**1649. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule has adverse impacts on private property access.**

The existing rule inadequately assures that the valid existing rights individual landowners, states or tribes have to access their lands will be honored. (Individual, Juneau, AK - #A22284.40300)

**1650. Public Concern: The Forest Service should prohibit home building in roadless areas.**

Home-building should be prohibited not only in the roadless areas, but on the perimeter of the roadless areas as well. (Individual, Bozeman, MT - #A285.90110)

## **Access to National Forest System Lands Through Private Property**

### **Summary**

Several respondents discuss the need to maintain access through private property to public lands. They assert that public lands are sometimes landlocked by private property and that the public is then denied legitimate access. "Sometimes the area of private property to cross to get to the National Forest would only be 50 yards or so," states one individual. "But no access is allowed. Many public roads go up to locked gates." To address this problem, some urge the Forest Service to maintain public rights-of-way through private property when public land is bordered on all sides by private land. Likewise, one individual asks the Forest Service to prevent private property owners from blocking access to other private inholdings; and another asks the Agency to allow public access through private or tribal grazing allotments.

**1651. Public Concern: The Forest Service should prevent public lands from being landlocked by private lands.**

Many roads are shut down due to private property limiting the access. I say no more roads or improvements but also stop shutting down the access to the existing roads. Many lands are becoming landlocked by private land. (Individual, No Address - #A417.90110)

#### **IN THE LOS PADRES NATIONAL FOREST**

I used to live near the Los Padres National Forest. The vast majority of the forest in San Luis Obispo County is landlocked by private property. It is a lot of public land with no access unless you own the property next to it. It amounts to a strictly private use of a public resource. Sometimes the area of private property to cross to get to the National Forest would only be 50 yards or so. But no access is allowed. Many public roads go up to locked gates. In theory the reason we maintain the road is for fire suppression. What it amounts to is the government maintaining a private road. (Individual, Eagle River, AK - #A19687.91110)

**1652. Public Concern: The Forest Service should maintain public rights-of-way through private property.**

#### **WHEN PUBLIC LAND IS BORDERED ON ALL SIDES BY PRIVATE LAND**

I think that if public land is bordered on all sides by private land and the only access is through these private lands, the USFS should fairly and reasonably make access available for the general public. (Individual, Sidney, NE - #A4207.91110)

Our major problems were wealthy people, dude ranchers, and commercial outfitters buying or leasing private lands contiguous to public lands. Then they would attempt to block or gate historical roads/trails through prescriptive country, we often had to go to state or Federal courts to protect public access rights.

The problem has not gone away, and Public Land Access Association is active in several Western states. The administration should encourage the BLM and Forest Service to actively seek reasonable access to roadless public lands and enclosed private and state lands including condemnation procedures where necessary. (Individual, Bozeman, MT - #A13871.40300)

Also BLM land that is closed to public by being land locked by private land should have a right-of-way to it for public access. This is our land too! (Individual, Mill Hall, PA - #A7522.91110)

### **1653. Public Concern: The Forest Service should prevent private property owners from blocking access to other private inholdings.**

One property owner was under the impression my southern neighbor was not allowed up the road (Trail 67). He placed a locked gate on the other road to my property thereby locking me out. When I cut the locks to gain access to my property, a criminal charge was filed against me for cutting the locks. From the sheriff's report, ". . . stated that the only reason he locked the gate was to keep the guy who lives in Walker . . . from driving up through his property which [this person] has been told by authorities that he is not allowed to do." The only authorities around are the Forest Service. The person in question does have a right to use that road. (Individual, Phoenix, AZ - #A29149.40000)

### **1654. Public Concern: The Forest Service should allow public access through private or tribal grazing allotments.**

Private or tribal users of federal grazing cannot deny public access to public land. (Individual, Mesa, AZ - #A99.40000)

## **Maintenance of Routes through National Forest System Lands to Private Property**

### **Summary**

**General Comments** – A number of respondents write that the Forest Service should provide access routes across National Forest System lands to private inholdings. Suggestions for ensuring access include maintaining existing roads and historically accessible routes; establishing the shortest route; defining levels of vehicular access; patterning access routes after the National Park Service; allowing foot and horseback trails, or *only* foot and horseback trails; complying with Revised Statute 2477; training personnel regarding laws governing private property access; allocating more funds to preserve access; and refraining from creating small areas of protected roadless regions, particularly in areas adjacent to private property. People also suggest ensuring access through geodetic grid lines; through established access points; through non-motorized easements; and through airstrips and helispots. Some suggest that the Forest Service address this issue through the forest planning process; through meetings with individual stakeholders; through collaboration with county sheriffs; or by conducting a case-by-case access alternatives analysis for each inholding.

One association recommends that property owners be allowed seasonally unrestricted ground-based access within environmentally reasonable constraints. Some suggest that the Forest Service should grant access to property owners previously denied; should not require private property owners to comply with wilderness standards with regard to access; and should not require fees for access to private property. Finally, some suggest that the Forest Service should manage access routes in a way that contributes to a feeling of inaccessibility, and should block access to groups which damage the environment.

**Road Construction/Maintenance** – One individual suggests that the Forest Service should permit road construction to land “if the entity possessing the land owned the land prior to the government’s ownership of surrounding properties.” Several other respondents state that the Forest Service should not construct roads for the sole purpose of providing access to private inholdings. One individual asserts, “Private ownership doesn’t mean the right to usurp the public’s right to protected forests. If a stream is on my property, I shouldn’t have the right to pollute it while it flows through my yard to the detriment of my neighbor. Likewise if a group owns land within a forested area, building a road to accommodate them at the expense of those who seek protection for the forest is wrong.”

**Road Construction/Maintenance – Funding** – Several individuals state that private property owners should bear the cost of constructing or maintaining access roads. According to one person, “It is not the job of the federal government (taxpayers) to provide access to private property. The cost should be borne by those who benefit individually.”

**1655. Public Concern: The Forest Service should provide access routes to private property.**

The Forest Service should work with private inholders of land to allow them access to their property and give them easements to their property.

No exceptions, the federal government should not devalue property by blocking access. The inholder should have the legal right of condemnation of the necessary easement for his usage, just as the government does when they want to widen the freeway or a county road. (Individual, Bozeman, MT - #A59.40000)

Those that reside in areas adjacent to roadless areas should/must not be denied access to their property. No one should ever intend for public policy that protects wilderness to keep a person from his private property. While it is reasonable that no new roads be built in a roadless area, it is not inconsistent to have a pre-existing route in the wilderness and the desire to protect that wilderness. (Individual, Murrieta, CA - #A367.40000)

On the question regarding public/private property rights . . . by all means those organizations/people/governments should have complete unrestricted access to their land at any time without any intervention from big government. (Individual, Ogden, UT - #A590.40000)

**BY MAINTAINING EXISTING ROADS**

Roads allowing for inholding access should be maintained, but no new roads built. (Individual, Fayetteville, AR - #A1015.40000)

The Forest Service should not close existing roads that would deny access. If a private landowner closes part of a Forest Service road that crosses their property, the Forest Service should determine the importance of the road and build an alternative route if necessary to protect public access. (Individual, Tucson, AZ - #A4938.40400)

**BY ALLOWING PRIVATE PROPERTY OWNERS TO BUILD ROADS**

The best way to assure access to private property located within “roadless” areas is to permit property owners to build roads to access their properties. This does not mean the government should build the roads, but the Forest Service must not stand in the way with red tape. (Individual, Salt Lake City, UT - #A806.40000)

### **BY CONSTRUCTING LOW-IMPACT ROADS**

Protecting access to property. This is a difficult question. Where such inholdings may be exchanged or purchased by the Forest Service, a less damaging solution is possible than the requirement to provide new access roads through roadless areas. Where this cannot occur, low impact roads may be necessary or permitted, if they can be built to a standard that protects watershed resources. (Individual, Grangeville, ID - #A728.40000)

“Build roads that are ‘environmentally safe’ (this can be done) to allow access. I suppose you could provide free helicopter service, or have a Sierra Club member volunteer to carry people like a large back pack to and from their property, but I think building a road that is not environmentally damaging makes more sense, and will be less costly (halting people from accessing their own property is a travesty).” (Individual, No Address - #A834.40000)

### **BY MAINTAINING HISTORICALLY ACCESSIBLE ROUTES**

That property that has been historically accessible should usually remain so, or compensation should be provided. Property that has historically depended on the good graces of the Forest Service road program should be understood to have no inherent right to access in cases where those roads were built to be temporary. (Individual, New Haven, CT - #A616.40000)

### **BY ESTABLISHING THE SHORTEST ROUTE**

People should have the closest, shortest route reasonable to their property not hundreds of miles around about to their property. (Individual, Turtle Lake, WI - #A6075.40400)

This area is steep mountain grades and there is a road used to provide a means for me to visit my neighbor. It used to take less than 5 minutes. Now, because of the Forest Service I must drive in a round-about way that is close to a 50-mile trip that takes 2-3 hours. (Individual, Phoenix, AZ - #A29149.40000)

### **BY DEFINING LEVELS OF VEHICULAR ACCESS**

There is access and there is access. The policy question hinges on the right of access. If a person can only walk to their land—is that access? It is clear that law can limit people from using their land to the highest and best use, in that person’s opinion. The same must have implications for the access issue. Should a court find that access by foot, is not adequate access for the enjoyment of the land, then the next step would be to define levels of vehicular access. There are undoubtedly such classifications. (Individual, No Address - #A781.40000)

### **BY PATTERNING ACCESS ROUTES AFTER THE NATIONAL PARK SERVICE**

The “best” ways to implement the laws that guarantee states, tribes, organizations and private landowners access to property they own within roadless areas is to perhaps pattern after the National Park Service and the manner in which they work with those who have land within park boundaries. We have land within Glacier National Park and the partnership we have with them is very satisfactory. It is extremely important that management of private lands and access to them are consistent with the roadless objectives. (Individual, Coram, MT - #A539.40000)

### **BY CONSTRUCTING MINIMUM SIZED TRAILS**

Reasonable access to property doesn’t mean punching in a 40 ft. graded road through a previously roadless tract of land to appease some inholder. “Reasonable access” is a very ambiguous term and I believe the Forest Service should always in these instances defer to the “minimum tool” rule. An 18-inch trail to me can be justified as providing “reasonable access”. (Individual, Challis, ID - #A16973.40400)

### **BY ALLOWING FOOT AND HORSEBACK TRAILS**

Properties currently accessed by foot/horseback trails should also be allowed continued access, although trail maintenance through public land would become the (private property) owner’s responsibility. (Individual, Vista, CA - #A4838.40100)

The best way to ensure legal access to private, tribal, or state land inside roadless areas is to allow foot and/or horse traffic anywhere within the areas. (Individual, Bozeman, MT - #A285.40400)

If the area is designated as roadless, inholders should walk or ride horses into their holdings. Much precedent for this has long been in effect in national parks. (Individual, Ennis, MT - #A102.40000)

#### **BY ALLOWING ONLY FOOT AND HORSEBACK TRAILS**

Legal access to private, tribal or state land within roadless areas should be available by foot or by horseback only. (Individual, Bozeman, MT - #A282.40400)

#### **BY ENFORCING REGULATIONS**

Access to private inholdings should be allowed on a minimum impact level. Regulations on violation should be heightened to prevent abuse by land speculators, as has occurred with wilderness inholdings near Vail, Colorado. (Individual, Spokane, WA - #A20648.40400)

#### **BY COMPLYING WITH REVISED STATUTE 2477**

If USFS personnel respect RS-2477 rights (including the Section 108 prohibition on changing the definition of an RS-2477), access to essentially all such property will be protected. (Organization, Tonopah, NV - #A20337.40100)

If extant RS-2477 rights-of-way and roads are respected, essential motorized access will remain available to essentially all private property and to nearly all of the forest around most communities. If the Forest Service refuses to recognize the RS-2477 status of double track dirt roads or interferes with their maintenance and repair by counties and individuals (which USFS is currently doing at a 130 year old Jarbidge Nevada road, thereby putting the Jarbidge residents at great risk of wildfires), much property will be destroyed, and many people will die in wildfires . . . . and you will be responsible. (Organization, Tonopah, NV - #A20337.35000)

#### **BY TRAINING PERSONNEL REGARDING LAWS GOVERNING PRIVATE PROPERTY ACCESS**

If forest staff members are unfamiliar with laws regarding access to private lands, training should be conducted to familiarize the staff with these laws. (Individual, Asheville, NC - #A22623.40100)

#### **BY ALLOCATING MORE FUNDS TO PRESERVE ACCESS**

We urge the Forest Service to spend more funds working with local governments to enact similar ordinances so that public access is protected. (Elected Official, Hailey, ID - #A4888.12313)

#### **BY REFRAINING FROM CREATING SMALL AREAS OF PROTECTED ROADLESS REGIONS**

Finally, the agency should refrain in the forest planning process from creating smaller pockets of protected roadless areas that cause access problems. (Permit Holder, No Address - #A5285.40000)

#### **BY NOT DESIGNATING AREAS ADJACENT TO PRIVATE PROPERTY AS ROADLESS**

Protecting access to private property can be done by not allowing an area adjacent to these private properties to be classified as roadless. (County Fire Department, Uintah County, WY - #A15287.40000)

#### **ONLY IF PUBLIC ACCESS TO PUBLIC LAND IS PRESERVED**

If the public is refused access to public forest property, then the property owners should also be refused access. The idea of private access or privileges in public or leased land is very unsettling to me! I can fish the river until I reach private property and then the water, streambed, and all that flows over it is no longer public until I reach another property line? Protect access to property unilaterally! (Individual, No Address - #A26741.40000)

#### **ONLY IF PUBLIC ACCESS TO NATIONAL FOREST SYSTEM LANDS IN GENERAL IS PRESERVED**

If the public is refused access to public forest property, then the property owners should also be refused access. Essentially, what is happening here, is that you are "condemning" property that the public owns and locking out the public landowners. (Individual, Annabella, UT - #A30323.40000)

**WITHIN TEN DAYS OF A PROPERTY OWNER'S REQUEST**

Local forests do not need any further laws to limit or hamper access to public lands for any user, organization, tribe, or private citizens. If access is needed to get to property then they should be granted access within 10 days of their request. All they need to do is follow local building codes and use standard road designs. Requiring private property owners to endure months or years of endless studies and appeals is not legal or moral. (Individual, Alturas, CA - #A28581.40000)

**THROUGH GEODETIC GRID LINES**

Provide reasonable forced access through the defined geodetic grid lines. (Individual, Sitka, AK - #A23579.40000)

**THROUGH ESTABLISHED ACCESS POINTS**

Access should be assured to the protected areas in the same fashion that we protect access to our California coastline. There must be designated entry points that allow for reasonable access, and all development must allow for these access points. These access points may involve roads leading up to, but not into the protected areas. Eminent domain may be employed to effect this access. (Individual, Santa Barbara, CA - #A504.40000)

**THROUGH NON-MOTORIZED EASEMENTS**

The best way to ensure legal access to private, tribal or state lands that are completely within roadless areas is to grant the concerned parties non-motorized access easements. The Forest Service should be responsible for designating, designing, building and maintaining access trails where necessary. (Individual, Bozeman, MT - #A3673.40000)

**THROUGH AIRSTRIPS AND HELISPOTS**

Any private property presently serviced by airstrips or helispots should be allowed to continue with that. Future proposals for airstrips should be granted within FAA guidelines, since backcountry airfields are generally small, have dirt, gravel, or grass surfaces, are useable only in daylight hours of summer and fall, and do not impact surrounding roadless areas to any substantial degree. (Individual, Vista, CA - #A4838.40100)

The best way to implement the laws that ensure States, tribes, organizations, and private citizens have reasonable access to property they own within inventoried roadless areas is, again, by using helicopters. (Individual, No Address - #A536.40400)

**THROUGH AN EXCEPTION TO THE ROADLESS AREA CONSERVATION RULE**

What is the best way to implement the laws that ensure States, tribes, organizations, and private citizens have reasonable access to property they own within inventoried roadless areas? Exception to the roadless ban should be made so these entities can access their lands. (Individual, No Address - #A850.40000)

To protect the reasonable access to property why not simply add a trailer on to the rule, and/or make an amendment to the rule that provides for the protection of the States, tribes, organizations, and/or individuals that need that protection. The determination and consideration of that protection could be initiated by the local districts, with regional approvals (but with a minimum of "red tape" attached). (Individual, Maricopa, CA - #A3732.40000)

**THROUGH THE FOREST PLANNING PROCESS**

There are more than 421,000 acres of private lands and 43,000 acres of state lands within inventoried roadless areas. The only reasonable place to resolve access issues is at the local planning level where state, county, and private owners can be notified and invited to provide input, and reasonable solutions can be developed based on their needs and rights to access. (Association, Colville, WA - #A3091.40000)

The current proposed plan also does not provide for access consideration to private and state lands within the inventoried roadless areas. This again should be resolved on a local forest level with all parties' rights to access recognized. (Individual, Pawleys Island, SC - #A6082.40000)

#### **THROUGH MEETINGS WITH INDIVIDUAL STAKEHOLDERS**

Contact stakeholders, on an individual basis if required, and see that their needs are met. (Individual, Tucson, AZ - #A936.40000)

#### **THROUGH COLLABORATION WITH COUNTY SHERIFFS**

Work with the County Sheriff, he is the protector of access on private property in the county even if it's on Forest Service land or roadless. (Association, Baker City, OR - #A7990.40000)

#### **THROUGH THE NATIONAL FOREST MANAGEMENT ACT**

NFMA is the focal point for protecting these routes to private and state lands. There is sufficient direction and flexibility in the regulation to do that. We only need to follow through and see that it happens. (Organization, Saint Anthony, ID - #A13225.40100)

#### **BY CONDUCTING A CASE-BY-CASE ACCESS ALTERNATIVES ANALYSIS FOR EACH INHOLDING**

Access to inholdings is important to the state of Nevada. We recommend a case-by-case access alternatives analysis be conducted for each inholding. These analyses should involve all property owners and other concerned stakeholders. Criteria should be established for finalizing access plans and the criteria should be used to strike a balance between minimizing adverse environmental impacts and minimizing access-related costs for property owners. (State Agency, Carson City, NV - #A17669.40100)

#### **TO RESTORE THE PUBLIC'S FAITH IN GOVERNMENT**

If for no other reason, honoring the access to the private properties can help to reverse the negative image that government has earned through decades of not being a good neighbor to the private sector. (Association, San Luis Obispo, CA - #A6984.40000)

#### **WHILE PREVENTING ACCESS BY UNAUTHORIZED PARTIES**

Again, the simple solution is to maintain standards, existing access to these tracts surrounded by federal lands. Issue federal easements to these owners and reduce this unnecessary headache that private citizens go through to access the property they duly and legally own. Put up locked gates and only allow those with legal access through the federal easement. It is totally unnecessary to quibble about private property access. Give it to them on a national easement level and be done with it. (Individual, Montrose, CA - #A370.40000)

#### **IN ALASKA**

There are limited private and state holdings in Alaska. It is critical that these lands have unrestricted access and unrestricted use. If areas surrounding the limited private and state lands are managed in a way that restricts use, the economy of the area will be adversely affected and citizens will be deprived of their rights to use the land for providing jobs and recreation. (Individual, Sitka, AK - #A12821.40300)

#### **IN NORTH DAKOTA**

The issue of access has been a contentious one between North Dakota counties and the Forest Service. If the Forest Service is serious about respecting access to property, it needs to adjust its policies to fit the facts and history underlying the acquisition of the lands now called the National Grasslands. Until the Forest Service does so, it cannot achieve this objective in North Dakota and will find itself at odds with the state and counties, not to mention the public.

Virtually all of the roads that the Forest Service to date claims the right to regulate are roads that provide access to private property. However, unlike land reserved for National Forests, these roads and road rights existed before the United States acquired the land and the orders approving the condemnation prove that the United States' title is subject to these rights. Thus, the Forest Service has no legal basis to regulate these roads. This situation further proves that to date, the roadless and related transportation policies have worked to deny access to private property, and in the case of North Dakota, have done so without sound basis. (Elected Official, McKenzie County, ND - #A27737.40000)

### LANDS CONTROLLED BY THE STIMSON TIMBER COMPANY

Your letter dated July 19th: **Protecting access to property** USDA will ensure that states, tribes, and private citizens who own property within roadless areas have access to their property as required by existing law. This statement is false. Access is not available. Existing laws (regulations) are constantly being changed in favor of the government to continue denying access.

Stimson Timber has been trying to get access to their private property. Access was originally requested in 1992 when the land was owned by Plum Creek Timber Company. Stimson Lumber Company purchased the land in 1996 and has continued pursuing access.

As of today, July 29, 2001, Stimson still does not have access. Can you imagine the damage to the property from drought and insects that has happened and continues? The Priest Lake Ranger District advises that the EIS has been submitted for printing in the Federal Register. After it has been printed there will be another 45 days for public comment, and then another 45 days for any appeal.

The tangled red tape and unconscionable delays are unacceptable. The forests in the Western United States are constantly changing while your unreasonable rules and time delays deny property rights to those owning property in these forests.

After almost ten years Stimson still does not have access and the economic benefits that could have been enjoyed by the workers, and county and state taxes have been considerably diminished. (Individual, Boise, ID - #A2541.40100)

### **1656. Public Concern: The Forest Service should allow property owners seasonally unrestricted ground-based access.**

#### WITHIN ENVIRONMENTALLY REASONABLE CONSTRAINTS

Property owners should have seasonally unrestricted ground-based access within environmentally reasonable constraints. Only property owners should have the legal right to appeal what they consider unreasonable constraints. (Association, Cody, WY - #A41559.40000)

### **1657. Public Concern: The Forest Service should provide access routes to state-owned lands.**

#### IN MINNESOTA

The State of Minnesota and the MNDNR are keenly interested in issues affecting access to state lands. Maintaining access to non-federal working forests is critical to Minnesota's rural economy. The final RAC rule issued late last year substantially affected access to nearly 11,000 acres of state lands and nearly 15,000 acres of state-owned minerals within inventoried roadless areas. The MNDNR provided comments on the proposed RAC rule and DEIS in July 2000 and Minnesota Governor Jesse Ventura responded for the state to the Final EIS and preferred alternative last December. Copies of both letters are attached as background. (State Agency, Saint Paul, MN - #A28770.40000)

#### IN MONTANA

The state of Montana has experienced trouble in the past with obtaining access to state lands. For example, in a letter dated February 10, 2000 addressed to Region 1 Forester Dale Bosworth, the Montana Department of Natural Resources and Conservation noted difficulty in obtaining access to forested state trust lands across federal acres. In one of the most troubling projects, the state has been unsuccessful after six years of trying to obtain access for the Phoenix timber sale, which would cross a portion of the Beaverhead/Deerlodge National Forest. (Governor, State of Montana - #A17660.40100)

### **1658. Public Concern: The Forest Service should grant access to property owners previously denied.**

Access to private property must be guaranteed, and access must be restored to property owners previously denied. (Individual, San Antonio, TX - #A6004.40000)

**1659. Public Concern: Local authorities should determine permissible access routes to private property.**

Free access should be allowed, determined by local authorities and not by the Forest Service. (Individual, Ogden, UT - #A494.40000)

The best way to implement the laws that ensure reasonable access to property within roadless areas would be to use a local council of governmental agencies to oversee the proper implementation and enforcement of access laws. (Individual, Boise, ID - #A674.40000)

Work with the County Sheriff he is the protector of access on private property in the county even if it is on FS land. (Individual, Baker City, OR - #A1038.40000)

**1660. Public Concern: The Forest Service should manage access routes in a way that contributes to a feeling of inaccessibility.**

Laws that ensure access to private properties landlocked within roadless areas must include parameters that dictate roadways be maintained as unobtrusively as possible. Grandfathered roadways in roadless areas must be managed in a way that contributes to the feeling of inaccessibility. Road building to access inholdings should be denied if possible. (Individual, Fairfield, VA - #A15817.40400)

**1661. Public Concern: The Forest Service should not require private property owners to comply with wilderness standards.****WITH REGARD TO ACCESS**

Access to private property should be in compliance with state laws. Private land owners should not be subject to the same ridiculous, discriminatory laws that apply to wilderness areas. Reasonableness and common sense in determining the least impact on federal lands, ensures the least cost to the landowner. The forest plan should spell out conditions of ingress and egress. (Association, Eureka, MT - #A17718.40100)

**1662. Public Concern: The Forest Service should not require fees for access to private property.**

Leave roads open. Require no fees to access a person's private property. (Individual, Mount Ida, AR - #A8739.40000)

**1663. Public Concern: The Forest Service should block access to ecologically damaging groups.**

Tribes and citizens with private property must be able to access their land, but only in a responsible manner. Organizations, more than likely, will be attempting to extract resources from their own land, and the Forest Service should not help, in any way, these organizations to further their scheme. While a private group's actions on private property is a whole other issue, the Forest Service should actively work to not provide access to ecologically damaging groups. (Individual, Akron, OH - #A17697.40400)

**1664. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule has no impact on access to state and private inholdings.****IN IDAHO**

Nowhere in the information I have seen issued by the State of Idaho, through the Attorney General, the Governor or the Idaho Department of Lands, is there any specific problem presented by the RACR in regards to state access to its lands. The State of Idaho has made this issue of access very prominent but there is no proof there. The RACR maintains the current system of permitting access to state, private and

tribal lands. There is not a problem here that needs to be fixed. If the state, or any other entity, desires access to any of its lands through National Forest land it follows the existing procedures and if it is appropriate a road can be built, regardless if it is in a roadless area or some place else.

The Idaho Conservation League follows the issues related to roadless areas very closely and there is no specific problem in the RACR raised by anyone on access with any factual basis. This is a political whipping boy, without any practical merit that I can fathom. I hope these alleged problems are spelled out in this current ANPR process, otherwise it will be confirmed as nonsensical. (Organization, Boise, ID - #A20363.40100)

## *Road Construction/Maintenance*

### **1665. Public Concern: The Forest Service should permit road construction to land that was privately owned prior to the government's ownership of surrounding property.**

If the entity possessing the land owned the land prior to the government's ownership of surrounding properties, then I might be willing to consider some roads through the government-owned wilderness. (Individual, Columbus, OH - #A659.40300)

### **1666. Public Concern: The Forest Service should not construct roads for the sole purpose of providing access to private inholdings.**

This is a nonsense issue. The only thing you could be referring to here is "private inholdings" in wild areas. I'm happy for people lucky enough to have such lands. But they have no right to expect the government to forfeit a common treasure (roadless wild areas) to subsidize the desires of an individual property-owner. If you're lucky enough to hold a few square miles in the middle of a wilderness area, you can walk to it, take a boat, or ride a horse. Just like the rest of us who travel through these areas. (Individual, No Address - #A49.40000)

Private ownership doesn't mean the right to usurp the public's right to protected forests. If a stream is on my property, I shouldn't have the right to pollute it while it flows through my yard to the detriment of my neighbor. Likewise if a group owns land within a forested area, building a road to accommodate them at the expense of those who seek protection for the forest is wrong. Who says landowners have more rights than citizens who pay the taxes that maintain and preserve federal lands? (Individual, Shawnee Mission, KS - #A96.40000)

As for people who own property in or near roadless areas, one can only assume that they were aware that the area was roadless when they made the purchase. Restricting construction of roads in these areas will maintain the character of the areas they purchased. It is NOT the responsibility or role of the government to change these areas by providing increased access. (Individual, No Address - #A621.40000)

### **1667. Public Concern: The Forest Service should address its contradictory statements regarding special use permits and public roads.**

The Forest Service position that public roads require a special use permit under 36 C.F.R. [section] 251.110, is also without precedent. Special use permits are used for access granted by the Forest Service, not for valid existing rights, which predated land acquisition. The special use rules do not apply to public roads under the Federal Highway Act, 23 U.S.C. [section] 201. The Forest Service has represented to the public that the rules do not affect public roads, while telling county governments that no roadwork could occur without a special use permit. Letter of Lesley Thompson, August 1, 2000. These two positions contradict each other. This attitude and the underlying policy preclude the Forest Service from achieving the objective of protecting access to private property. Indeed, the agency's litigation position on this issue has reflected a concerted effort to deny access to private property. (Organization, Denver, CO - #A21358.40000)

## Road Construction/Maintenance – Funding

### **1668. Public Concern: Private property owners should bear the cost of constructing or maintaining access roads.**

It is assumed most of these entities have some sort of access to their properties already. Let them maintain that access at their own expense. (Individual, Anchorage, AK - #A518.40300)

Creation of new access roads should be a very last resort, only done when the letter of the law forces your hand. Property owners should shoulder the full cost if and when that happens, and roads must be as primitive as possible and be closed to public use. (Individual, Flagstaff, AZ - #A5026.40400)

It is not the job of the federal government (taxpayers) to provide access to private property. The cost should be borne by those who benefit individually. (Individual, No Address - #A1097.40600)

## Legal Considerations

### Summary

A number of respondents advise the Forest Service to ensure access to private property as required by existing law—specifically, the Alaska Native Claims Settlement Act, the Alaska National Interest Lands Conservation Act, and Revised Statute 2477 (see comments on these acts in Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies). Some suggest the Forest Service review current laws governing private property access; familiarize personnel with laws regarding access to private lands; and disclose its legal obligation to provide access routes under existing laws since “it is misleading to the public to characterize lands burdened by statutory obligations to provide access to private inholdings, as roadless.”

Several respondents comment specifically on the need to uphold valid existing rights. Some say the Forest Service should implement the Roadless Area Conservation Rule because it would adequately protect valid existing rights; others say the Agency should not implement the Rule because it would not protect valid existing rights.

Others discuss the appeals process as it relates to access. One association asserts that private property owners should have the right to appeal unreasonable constraints on access. Another individual states that the Forest Service should ensure consistent treatment of inholders with respect to the appeals process over the establishment of ownership rights. According to this person, “The proposed rule leaves complicated planning considerations, housing laws and social issues up to regional FS determinations. There are limited and complicated appeal processes unique to property within National Forests. The result is disparate treatment of inholders from a federal perspective.”

### **1669. Public Concern: The Forest Service should ensure access to private property as required by existing law.**

Access should be provided for within the laws the same way it has always been; evaluate the need and allow the type of access appropriate according to the need and the existing laws and guidelines. Do not make this concern any more significant than Congress does when it passes laws designating areas as wilderness. (Individual, No Address - #A1702.40100)

Access to state and private inholdings is already covered by other laws and regulations. No special provisions are needed. (Individual, Baltimore, MD - #A2321.40100)

Protecting Access to Property: I would hope you have no plans to terminate anyone's historic or deeded Right-of-Way to their property, without due compensation and due process of LAW. (Individual, Center Sandwich, NH - #A3669.40100)

It is misleading to the public to characterize lands burdened by statutory obligations to provide access to private inholdings as roadless. Many of the Chugach National Forest lands characterized by the rule as roadless are, in fact, burdened by obligations to allow roads to access private lands as promised by ANCSA, ANILCA, and the 1982 CNI Settlement Agreement. Failure to disclose these obligations to the public is intentionally misleading, creating false expectations to citizens and doing a disservice to private inholders. (Professional Society, Anchorage, AK - #A21707.40000)

#### **BY ABIDING BY THE REQUIREMENTS OF THE ALASKA NATIVE CLAIMS SETTLEMENT ACT**

The national forests in Alaska are different than other national forests in the U.S. in a number of ways, including laws unique to Alaska, like the Alaska Native Claims Settlement Act (ANCSA) of 1971. With the passage of ANCSA, 44 million acres of federal lands were made available for selection and conveyance to Alaska Natives in 12 regions of the state. Large tracts within both the Tongass and the CNF were made available to satisfy the ANCSA mandate, causing ANCSA Corporations to be effectively joined at the hip with the Forest Service in these regions. Despite the unique legislation enacted to allow ANCSA Corporations to realize the full economic benefits of their lands, obtaining access to its lands across CNF continues to be one of the most difficult challenges Chugach faces. The roadless rule, while acknowledging the existence of "valid and existing rights", does little to clarify those rights and if implemented, as a practical matter, would make obtaining such access even more difficult. (Tribal Corporation, Anchorage, AK - #A20340.40000)

#### **BY ABIDING BY THE REQUIREMENTS OF REVISED STATUTE 2477**

Private landowners within forest boundaries must be allowed ingress and egress (whether in a roadless area or not). This brings up another issue. That is RS 2477. Congress granted the states roads over the public lands. This cannot be taken away by declaring a roadless area policy. Any roads that the state or county maintains must be left open for their (constituents) use. (Individual, Miami, AZ - #A880.40100)

#### **BY ABIDING BY THE REQUIREMENTS OF THE ALASKA NATIONAL INTEREST LANDS CONSERVATION ACT**

Access to private property is provided for under provisions in the Alaska National Interest Lands Conservation Act (ANILCA), even in Congressionally-designated Wilderness Areas. There is no need to duplicate these provisions in a roadless rule. (Individual, Tacoma Park, MD - #A16325.40100)

ANILCA applies to all national forests and does not provide exception for specific categories of forestland, such as wilderness or inventoried roadless areas. Therefore, "the best way to implement the laws that ensure States, tribes, organizations, and private citizens have reasonable access to property they own within inventoried roadless areas" is for the Forest Service to comply with ANILCA. (Organization, Denver, CO - #A29624.40100)

#### **BY ISSUING NON-APPEALABLE DECISIONS**

If there are existing laws which GUARANTEE states, tribes, organizations and private land owners access to property they own within a roadless area, just allow them the access the law says they have by issuing a non appealable decision. Negotiation could be undertaken to plan location of roads and whether they could or should be closed after harvest. But following the law, there should be no denial by the Forest Service or appeal by disinterested parties. (Individual, Whitefish, MT - #A5102.40100)

### **1670. Public Concern: The Forest Service should review current laws governing private property access.**

#### **TO ENSURE THAT ACCESS IS MAINTAINED**

There are currently laws on the books to allow reasonable access to private properties located in roadless areas; however, these laws are sometimes sporadically enforced or at least hindered by managers who don't agree with the right of private access. The current laws need to be evaluated to make sure that

access is guaranteed, in non-ambiguous language, and that anyone found violating or hindering the enforcement of these laws should be held accountable without regard to position, rank or influence. (Individual, No Address - #A28602.40000)

**1671. Public Concern: The Forest Service should disclose its legal obligations to provide access routes under existing laws.**

**TO AVOID MISLEADING THE PUBLIC**

It is misleading to the public to characterize lands burdened by statutory obligations to provide access to private inholdings, as roadless. Many of the Chugach National Forest lands characterized by the rule as roadless are, in fact, burdened by obligations to allow roads to access private lands as promised by ANCSA, ANILCA, and the 1982 CNI Settlement Agreement. Failure to disclose these obligations to the public is intentionally misleading, creating false expectations to citizens and doing a disservice to private inholders. (Professional Society, Anchorage, AK - #A21707.40000)

**1672. Public Concern: The Forest Service should familiarize personnel with laws regarding access to private lands.**

If forest staff members are unfamiliar with laws regarding access to private lands, training should be conducted to familiarize the staff with these laws. (Civic Group, Roanoke, VA - #A1713.40100)

**1673. Public Concern: The Forest Service should consider that state statutes already ensure access to private property.**

**COLORADO STATE STATUTES**

Colorado State Statutes already ensures access to property cannot be impaired, impeded or disrupted. Enactment of laws intended to perform a purpose, when existing laws already perform that purpose, only confuses legal matters. (Elected Official, Saguache County, CO - #A28774.40100)

**1674. Public Concern: The Forest Service should uphold valid existing rights.**

**ON THE CHUGACH NATIONAL FOREST**

Most of Chugach's economically viable lands are adjacent to or surrounded by national forest lands, providing Chugach with no practical means of access to these inholdings except across federal lands within the 5.5 million acre CNF, which is inventoried 98.9% roadless. When applied to roadless areas within the CNF, the potential for the Forest Service's proposal to facilitate efforts to frustrate or impair Chugach's valid existing statutory and common law rights of access to its land is abundantly clear. For this reason, it is imperative that the proposal recognize and preserve, through the implementation of appropriate procedures, the valid existing rights of access, both express and implied, that Chugach enjoys across national forest lands to its land holdings under the provisions of ANCSA, ANILCA, the 1982 CNI Settlement and the common law. (Tribal Corporation, Anchorage, AK - #A20340.20000)

**1675. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule.**

**BECAUSE IT ADEQUATELY PROTECTS VALID EXISTING RIGHTS**

The January 12 rule provides protection for forest health, communities, homes and property and assures that the valid existing rights of individual landowners, states or tribes to access their lands will be honored. (Individual, Williamsville, NY - #A951.10152)

### **1676. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.**

#### **BECAUSE IT WILL NOT PROTECT VALID EXISTING RIGHTS**

The existing rule does not adequately assure that the valid existing rights of individual landowners, states or tribes have to access their lands will be honored. (Individual, San Antonio, TX - #A8983.10130)

### **1677. Public Concern: Private property owners should have the right to appeal unreasonable constraints on access.**

Property owners should have seasonally unrestricted ground-based access within environmentally reasonable constraints. Only property owners should have the legal right to appeal what they consider unreasonable constraints. (Association, Cody, WY - #A26503.40000)

### **1678. Public Concern: The Forest Service should ensure consistent treatment of inholders with respect to the appeals process.**

#### **OVER THE ESTABLISHMENT OF OWNERSHIP RIGHTS**

The proposed rule allows these decisions of fundamental rights of access to property to remain with local FS officials. This had led, and will continue to lead, to endless litigation between property owners and the FS just to maintain established ownership rights in the ever-changing FS regulatory environment.

In all cases the fundamental right of reasonable use and enjoyment or residential property should be assured. The proposed rule leaves complicated planning considerations, housing laws and social issues up to regional FS determinations. There are limited and complicated appeal processes unique to property within National Forests. The result is disparate treatment of inholders from a federal perspective. (Individual, Prescott, AZ - #A28094.13200)

## **Land Exchanges/Purchases**

### **Summary**

**General Comments** – One individual asserts that the Forest Service should cease acquiring more private property within inventoried roadless areas until it has regained control over other resources, such as its roads and maintenance backlog. Another person suggests that the Forest Service condemn private property located in roadless areas in order to obtain inholdings.

**Land Exchanges** – Several respondents suggest land exchanges of various sorts. Some suggest that the Forest Service exchange other federal land for private inholdings located in roadless areas. One individual recommends such land exchanges in order to prevent private interests from influencing management activities. “The presence of these inholdings,” this person states, “gives private interests a disproportionate influence over the management of these National Forests.” A timber association and state agency both recommend that the Forest Service exchange federal land outside of roadless areas for state lands within roadless areas. One individual suggests the Agency exchange other federal land for private inholdings located in wilderness areas; and another person advises against designating an area roadless unless all private inholders first agree to a land exchange.

**Purchases** – A number of respondents advise the Forest Service to purchase private inholdings—if the area is to be declared wilderness, or if other areas are to be reopened to multiple uses. According to one individual, “The Forest Service should aggressively buy and trade lands to rid roadless areas of private inholdings, and to build connections between roadless

areas and designated Wilderness areas.” Another person suggests the Forest Service should either buy private property or negotiate an access schedule with property owners if traffic levels escalate the environmental impact of access.

One individual advises the Forest Service to purchase inholdings with land and water conservation funds. Another person advises against using Conservation and Reinvestment Act funding to purchase inholdings. Rather, says this respondent, “[CARA] Funding should be for the construction of new roads and old road maintenance should be sought after.”

Other respondents discuss the purchasing process itself. One individual states that the Forest Service should not force private landowners to sell their property for the reason of obtaining inholdings. At the same time, others assert that the Forest Service should discourage private profiteering over the Agency’s purchase of private property in roadless areas, and should not succumb to blackmail by private property owners who threaten to construct large buildings on inholdings. Finally, one special use permit holder says that the price of private property within roadless areas should reflect the presence or absence of an access route to the property.

### *Land Exchanges/Purchases General*

#### **1679. Public Concern: The Forest Service should cease acquiring more private property within inventoried roadless areas.**

##### **UNTIL IT HAS REGAINED CONTROL OVER OTHER RESOURCES, SUCH AS ITS ROADS AND MAINTENANCE BACKLOG**

Until the agency has regained control over its resources, including roads and other maintenance backlogs, the Forest Service should avoid acquiring more property such as the private property within inventoried roadless areas. Access route maintenance must be a priority. (Individual, Des Moines, IA - #A12587.40500)

#### **1680. Public Concern: The Forest Service should condemn private property located in roadless areas.**

##### **TO OBTAIN INHOLDINGS**

Condemn the property and move them out. Or restrict the easement to the minimum to get to their property. Gate the easement, lock it so only the property owner has access (a visit to King Ranch in Texas will show you how to keep people out). (Individual, Tustin, MI - #A5276.40000)

### *Land Exchanges*

#### **1681. Public Concern: The Forest Service should exchange other federal land for private inholdings located in roadless areas.**

Protecting Access to Property - I feel this is a “straw man” issue that has been raised by those that don’t support the current rule. If roaded access is so critical why has it not already been developed? Land exchanges have long been successfully used in this area. Let’s do more. (Individual, Peck, ID - #A1109.40000)

Conduct land trades for roaded areas to consolidate roadless areas. (Individual, Ennis, MT - #A438.40500)

Owners of non-federal lands that occur within important roadless lands, such as those in the Cabinet Mountains, near Libby, should be 1) offered a land exchange for the land in more accessible areas

without conflicting values; 2) offer the owners a fair market price for their land, then buy it from them; 3) if they won't sell or trade, allow them to access their lands without the aid of motorized vehicles and/or road building. If they won't abide by these options, condemn the land, pay them for it, then put the land into roadless federal land. (Individual, Libby, MT - #A14047.40100)

#### **EXCHANGE PERIPHERAL FEDERAL LAND**

As with existing wilderness areas, it is best if the owners of private inholdings can be offered attractive exchanges for property on the periphery of National Forest lands. In this manner easier motorized access to their property can be offered, if that is what they desire. (Individual, Louisville, CO - #A4486.40000)

If private access is not available to parties who own land within roadless areas either by river/trail aircraft or non road using transportation, then the agency should either purchase or trade for similar land outside the roadless area. (Individual, No Address - #A101.40000)

#### **TO PREVENT PRIVATE INTERESTS FROM INFLUENCING MANAGEMENT ACTIVITIES**

This question provides an opportunity, however, for me to express the view that the Forest Service should adopt a policy of eliminating these private inholdings by equitable land swaps or the exercise of eminent domain. The presence of these inholdings give private interests a disproportionate influence over the management of these National Forests. Inevitably, they skew management decision making along the lines revealed in question number four. A forest manager once suggested to me that fires on national forest land had to be suppressed in order to protect the tiny percentage of land on the forest owned by private interests. Otherwise they might sue! Nonsense. Save us all a lot of money and headache and just buy these people out. (Individual, Pendleton, OR - #A30482.40000)

### **1682. Public Concern: The Forest Service should exchange federal land outside roadless areas for state lands within roadless areas.**

If access is limited or if the effects of federal policies preclude owners from effectively managing their lands within inventoried roadless areas, land exchanges may be necessary. This is the view of the state of Minnesota. Jesse Ventura, governor of Minnesota, stated in a December 5, 2000, letter to former Secretary Glickman in response to the state's inholding within roadless areas, "I request that the Forest Service assign a high priority to exchanging equivalent federal lands outside of the IRAs for state lands within these areas." Forest plan revisions present the best opportunity to discuss and resolve access issues. (Association, Duluth, MN - #A22631.40500)

#### **BECAUSE THE CUMULATIVE EFFECT OF NATIONAL MANAGEMENT RULES WOULD PREVENT REASONABLE ACCESS TO INHOLDINGS IN ROADLESS AREAS**

There are several interrelated National Forest rules that come into play in defining fair and reasonable access to non-federal lands. These include the Roadless Area Conservation Rule, the National Forest Transportation System Policy and Rules, the rules on Cost Recovery for Processing Special Use Applications, and the National Forest System Land and Resource Management Planning rules. Our conclusion was that the cumulative effect of these rules would preclude us from effectively managing state lands within the IRAs. Our suggested resolution was to pursue a land exchange. Where future management of IRAs as wilderness or unroaded areas precludes reasonable access (e.g., time, cost) to state lands, land exchange for federal lands outside the IRAs should be a high priority. (State Agency, Saint Paul, MN - #A30025.16100)

### **1683. Public Concern: The Forest Service should exchange other federal land for private inholdings located in wilderness areas.**

Private land holdings within wilderness should be traded so that the wilderness is relatively free of such encumbrances. (Individual, Evergreen, CO - #A19178.35300)

**1684. Public Concern: The Forest Service should not designate an area roadless unless all private inholders first agree to a land exchange.**

If the entity or private property owner does not agree to a land exchange, the area should not be designated roadless. (Individual, Kalispell, MT - #A3380.40000)

**Purchases****1685. Public Concern: The Forest Service should purchase private inholdings.**

If they have an easement of record there should be no problem. A better way would be to purchase the land and do away with the problem. I can't think of a better use of taxpayers dollars. (Individual, Kalispell, MT - #A97.40000)

Also, outright purchase from willing sellers using the Land and Water Conservation Fund should be aggressively pursued. (Individual, Peck, ID - #A1109.40000)

Private inholdings are a broader issue best dealt with by buyout. (Individual, Granite Bay, CA - #A5166.40100)

I assume this question [5] is addressing the situation of an inholding property. These properties should be acquired by the federal government at any opportunity. The public should not be in the business of building roads so an individual can access property that more properly should be part of the surrounding wilderness. (Individual, Macomb, IL - #A95.40500)

**IF THE AREA IS TO BE DECLARED WILDERNESS**

Private land owners must be provided reasonable and appropriate access to accommodate the intended use of their land. If the area is to be declared Wilderness, attempts must be made by the government to acquire such private lands. Lands outside of Wilderness must be actively managed to maintain healthy timber stands and keep fuel accumulations within reasonable levels. It follows therefore that reasonable and appropriate private landowner access can be accommodated within these lands. (Individual, Manhattan, MT - #A21848.40000)

**ONLY IF OTHER AREAS ARE TO BE REOPENED TO MULTIPLE USES**

Private property rights are one of the cornerstones of this nation and their preservation should be a primary concern. The right to access one's private property should not be lost at the expense of maintaining the integrity of a so-called "roadless" areas. To purchase or to attempt to purchase in order to maintain the illusory "roadless" character should only be done if other areas are to be reopened to multiple use and if the owner is truly interested and motivated to sell or exchange the parcel. (Individual, Denver, CO - #A5433.40100)

**WITH LAND AND WATER CONSERVATION FUND MONEY**

This is really tough—especially where there is a lot of checkerboard land. I recall one private parcel in the Crazy Mountains of Montana, a high elevation section that would have been a nightmare to build a road to. The owner was threatening to put in a subdivision and wanted roaded access, but the real agenda was to instigate a land exchange, whereby the forest would obtain the Goat Rocks section (thus sparing it from damage, to be sure), but in the process would have to give up a section of prime deer winter range on the margin of the mountains. Not a good deal for the public, either way. Probably the best way to handle it is to use Land and Water Conservation funds to purchase these inholdings. (Individual, Jackson, WY - #A10527.35300)

**TO BUILD CONNECTIONS BETWEEN ROADLESS AREAS AND DESIGNATED WILDERNESS AREAS**

It is very disingenuous to claim this as a serious issue. How many blocks of private land are actually surrounded by inventoried roadless forest? The Forest Service should aggressively buy and trade lands

to rid roadless areas of private inholdings, and to build connections between roadless areas and designated Wilderness areas. (Individual, Bozeman, MT - #A6189.40500)

#### IN THE TONGASS NATIONAL FOREST

I would like to see a more ambitious effort by TNF to acquire private inholdings in roadless areas, especially, the North Fork American. I like what they have done so far, and want them to do more. (Individual, Dutch Flat, CA - #A22445.35300)

### **1686. Public Concern: The Forest Service should either buy private property or negotiate an access schedule with property owners.**

#### IF TRAFFIC LEVELS ESCALATE THE ENVIRONMENTAL IMPACT OF ACCESS

If high traffic levels in a particular area escalate the environmental impact of such access, you can review the matter and either buy the property or negotiate an access schedule with the owners. (Individual, Chestertown, MD - #A462.40000)

### **1687. Public Concern: The Forest Service should not use Conservation and Reinvestment Act funding to purchase privately owned forest lands.**

Conservation and Reinvestment Act (CARA) funding should be reduced and restricted from purchasing privately owned forest near or within State or National Forests. Until the present Forest are managed correctly and an estimated \$8.4 billion maintenance and reconstruction backlog as of January 2001 is caught up, in order to maintain the existing 380,000-plus mile road system to environmental and safety standards, there should be no "new" forest acquired by USDA Forest Service. Instead, funding should be for the construction of new roads and old road maintenance should be sought after. (Individual, Jefferson, OR - #A775.40500)

### **1688. Public Concern: The Forest Service should not force private landowners to sale their property.**

#### FOR THE REASON OF OBTAINING INHOLDINGS

The rights to access private property should not be eliminated that predate all current laws, regulations, and designation of roadless areas. The USFS must abide by all existing applicable law in this manner. If private property within roadless areas is believed to be desirable for acquisition by the Forest Service, reasonable offers should be made to the owners. The sale of any private property within the National Forest should never be mandatory or coerced. (Individual, Edgewood, NM - #A5638.40000)

### **1689. Public Concern: The Forest Service should discourage private profiteering over the Agency's purchase of private property in roadless areas.**

Existing rights to property within roadless areas is a difficult issue. I happen to know that one individual in my state of Colorado . . . makes a business out of profiting from purchases specifically within such areas, expressly for the purpose of forcing this issue. Such greed-motivated activity should be discouraged if not legislated against. (Individual, Denver, CO - #A20707.40000)

### **1690. Public Concern: The Forest Service should not succumb to blackmail by private property owners.**

#### WHO THREATEN TO CONSTRUCT LARGE BUILDINGS ON INHOLDINGS

Buy them out wherever possible, at fair market rates for the type of property, but do not give in to property owners attempting to blackmail the Forest Service by threatening the construction of large buildings on inholdings. (Individual, Dallas, TX - #A18002.40500)

**1691. Public Concern: The price of private property within roadless areas should reflect the presence or absence of an access route to the property.**

When property is purchased inside of inventoried roadless areas, the property value should reflect the fact that road access is not an option. Otherwise the roadless designation becomes an economic bonanza to the property owner. Access should be the same kind as that enjoyed by the public. (Permit Holder, Rifle, CO - #A29619.40000)



## Appendix A

# Content Analysis Process

Public responses on the Advance Notice of Proposed Rulemaking are documented and analyzed using a process called content analysis. This is a systematic process of compiling and categorizing all public viewpoints and concerns submitted on a plan or project. Content analysis is intended to help decision makers clarify or adjust the the next phase of the project. Information from public meetings, letters, emails, faxes, and other sources are all included in this analysis.

In the content analysis process, each response is assigned a unique number. This number allows analysts to link specific comments to original responses. All respondents' names and addresses are entered into a project-specific database program, enabling creation of a complete list of all respondents.

Analysts read and code responses using the coding structure. Each comment is coded by subject and verified by a second analyst for accuracy and consistency. Then all coded comments are entered verbatim into a comment database. Database reports track all input and allow analysts to identify public concerns and to analyze the relationships among them. The final analysis document includes an executive summary, which discusses respondents' main areas of concern, and a formal list of public concern statements. Each public concern statement is accompanied by one or more sample excerpts from original responses.

This process and the resulting document do not replace responses in their original form. Rather, they provide a map to the responses and other input on file at the office of the Content Analysis Team (CAT) in Salt Lake City. Interested parties are encouraged to read public comment firsthand.

It is important to recognize that the consideration of public comment is not a vote-counting process in which the outcome is determined by the majority opinion. Relative depth of feeling and interest among the public can serve to provide a general context for decisionmaking. However, it is the appropriateness, specificity, and factual accuracy of comment content that serves to provide the basis for modifications to planning documents and decisions. Further, because respondents are self-selected, they do not constitute a random or representative public sample. The National Environmental Policy Act (NEPA) encourages all interested parties to submit comment as often as they wish regardless of age, citizenship, or eligibility to vote. Respondents may therefore include businesses, people from other countries, children, and people who submit multiple responses. Therefore, caution should be used when interpreting comparative terms in the summary document. Every substantive comment and suggestion has value, whether expressed by one respondent or many. All input is read and evaluated and the analysis team attempts to capture all relevant public concerns in the analysis process.



## Appendix B Coding Structure

Presented below is the list of categories or “codes” used to sort public comment on the Advance Notice of Proposed Rulemaking. A more detailed description of the coding, database construction, and other elements of the methodology used for this analysis can be found in Appendix A: Content Analysis Process.

### **PLANN 10000 Purpose and Need for Roadless Area Policy**

- 10110 Need for a national roadless rule, general
  - 10111 Necessary
  - 10112 Unnecessary
- 10120 Need for revision of the Jan. 2001 Rule
  - 10130 Abandon Rule/develop new Rule (*general reasons why*)
    - 10131 LACK OF RESPONSIVENESS TO LOCAL CONCERNS
    - 10132 ADEQUACY OF PUBLIC INPUT FOR SCOPING/DEIS
      - 10133 Volume of comment/content/participation
      - 10134 Timeframe
    - 10135 ADEQUACY OF MAPPING/OTHER INFORMATION FOR SCOPING/DEIS
    - 10136 RANGE OF ALTERNATIVES, DEIS (*GENERAL REFERENCE TO ADEQUACY OF RANGE OF ALTERNATIVES*)
    - 10137 ADEQUACY OF PRIOR INVENTORIES (*RARE I, RARE II*)
    - 10138 CONCURRENT NATIONAL PROJECTS
    - 10139 LITIGATION, FS/JD DEFENSE OF JAN. 2001 RULE
    - 10140 POLITICAL CONSIDERATIONS
    - 10141 FLAWS IN JAN 2001 RULE, OTHER
  - 10150 Strengthen Rule/do not develop Rule (*general reasons why*)
    - 10151 RESPONSIVENESS TO LOCAL CONCERNS
    - 10152 ADEQUACY OF PUBLIC INPUT FOR SCOPING/DEIS
      - 10153 Volume of comment/content/participation
      - 10154 Timeframe
    - 10155 ADEQUACY OF MAPPING/OTHER INFORMATION FOR SCOPING/DEIS
    - 10156 RANGE OF ALTERNATIVES, DEIS (*GENERAL REFERENCE TO ADEQUACY OF RANGE OF ALTERNATIVES*)
    - 10157 ADEQUACY OF PRIOR INVENTORIES (*RARE I, RARE II*)
    - 10157 CONCURRENT NATIONAL PROJECTS
    - 10159 LITIGATION, FS/JD DEFENSE OF JAN. 2001 RULE
    - 10160 POLITICAL CONSIDERATIONS
    - 10161 FLAWS IN JAN 2001 RULE, OTHER

### **PLANN 11000 Issue (Q10)**

- 11100 ANPR Issue identification (*adequacy, accuracy, clarity of the 10 questions, NOT answers to the questions*)
  - 11110 1. Informed decisionmaking (role of local forest planning)

- 11120 2. Working together to address roadless values
- 11130 3. Protecting forests (from fire and fuels, insects and disease)
- 11140 4. Protecting communities, homes, and property
- 11150 5. Protecting access to property
- 11160 6. Describing values of IRAs
- 11170 7. Describing activities allowed/prohibited
- 11180 8. Designating areas
- 11190 9. Competing values and limited resources (*balancing of*)
- 11200 10. Other concerns

**PLANN 12000 Decisionmaking Authority (Q1) (*Who should have authority*)**

- 12100 Role/authority
  - 12110 President/exec branch
    - 12111 CURRENT ADMINISTRATION
    - 12112 FORMER ADMINISTRATION
  - 12120 Forest Service
    - 12121 WASHINGTON OFFICE
    - 12122 CHIEF
    - 12123 ID TEAM
    - 12124 CAT
    - 12125 LOCAL FOREST SERVICE PERSONNEL
  - 12130 Legislative branch
  - 12140 Judicial branch
  - 12150 City, state, and county governments
    - 12151 LOCAL, STATE, AND COUNTY AGENCIES OR ELECTED OFFICIALS
  - 12160 Tribal governments
- 12200 Trust and integrity, general
  - 12210 Current Administration
  - 12220 Former Administration
  - 12230 Forest Service
  - 12240 City, state, and county governments or officials
  - 12250 Tribal governments
- 12300 Managing across jurisdictions (*protocol and need for managing across jurisdictions*)
  - 12310 Planning and Implementation (*involving agencies, states and counties in planning*)
    - 12311 MULTI-FOREST/REGIONAL (WITHIN FOREST SERVICE)
    - 12312 OTHER FEDERAL AGENCIES (BLM, PARK SERVICE)
    - 12313 STATE, LOCAL, OTHER AGENCIES
    - 12314 PRIVATE LANDOWNERS
- 12400 Interim direction (during rule revision, prior to forest plan revision, etc.)
  - 12410 Chief maintains authority
  - 12420 Regional foresters delegated authority
  - 12430 Line officers delegated authority (*Forest Sups or Districts*)
  - 12440 Moratorium on entry until rule finalized
  - 12450 Moratorium on entry until forest plans revised
    - 12451 TONGASS
  - 12460 No moratorium/no special considerations for RAs

**PLANN 13000 Role of Local Forest Plan Process (NFMA) (Q1)** *(How the planning process should work)*

- 13100 Appropriate scale of decisionmaking (local vs. national, who decides)
  - 13110 Forest-level (“local”) decision-making
  - 13120 National direction without local planning
  - 13130 Local planning with national direction
- 13200 Role and process of local forest planning (how to)
  - 13210 Implementation of national/WO direction
    - 13211 INCORPORATE NATIONAL RULE DURING NEXT FOREST PLAN REVISION
    - 13212 UPDATE INFORMATION/INVENTORIES
    - 13213 DETERMINE SITE-SPECIFIC AREAS FOR NATIONAL EXEMPTIONS
    - 13214 DETERMINE ADDITIONAL SITE-SPECIFIC RESTRICTIONS/PROHIBITIONS
  - 13220 Evaluation through current forest planning process *(little or no additional national guidance)*
  - 13230 Evaluation project-by-project, forest-level *(little or no national guidance)*

**PLANN 14000 Public Involvement, ANPR (Q2)**

- 14100 Adequacy/availability of information
  - 14110 Federal Register notice *(Federal Register notice detailed enough or not)*
  - 14120 Outreach/agency communication efforts
  - 14130 Web site
  - 14140 General request for more information
- 14200 Public meetings
- 14300 Adequacy of comment period *(for adequacy of comment period, Jan. 2001 Rule, see Purpose and Need)*
  - 14310 Extension needed
  - 14320 No extension needed
- 14400 Adequacy of timeframe *(for adequacy of timeframe, Jan. 2001 Rule, see Purpose and Need)*
  - 14410 ANPR, PR, and final rule
  - 14420 In conjunction with other national projects
    - 14421 TRANSPORTATION POLICY
    - 14422 PLANNING REGS
  - 14430 In conjunction with forest and regional level projects
- 14500 Use of science/best available information

**PLANN 15000 Public Involvement in Decisionmaking, General (Q2, Q9)**

- 15100 Managing National Forest System lands
  - 15110 Role of general public *(including public opinion)*
    - 15111 LOCAL CITIZENS/COMMUNITIES
    - 15112 NATION-WIDE CITIZENS/COMMUNITIES
  - 15120 Role of interest groups
    - 15121 ENVIRONMENTAL GROUPS
    - 15122 INDUSTRY/BUSINESS GROUPS

- 15123 MULTIPLE USE/WISE USE, RECREATION, ETC.
- 15130 Role of state and local governments
  - 15131 COOPERATING AGENCY STATUS
- 15140 Role of other federal agencies
  - 15141 COOPERATING AGENCY STATUS
- 15150 Use of public involvement/comment (*adequacy, methodology*)
  - 15151 METHODOLOGY AND TECHNIQUES
  - 15152 SUGGESTIONS
  - 15153 SUBMITTED ON SCOPING/DEIS FOR JAN. 2001 RULE
  - 15154 ANPR
- 15160 Managing competing interests **(Q9)**
  - 15161 EXISTING LEGAL/ADMINISTRATIVE GUIDANCE
  - 15162 ENHANCED COLLABORATIVE EFFORTS
  - 15163 PUBLIC EDUCATION/INFORMATION EFFORTS
  - 15164 FS STAFF TRAINING/EDUCATION
  - 15165 WILL OF PUBLIC
  - 15166 ECONOMIC VALUES (MARKET)
  - 15167 ECOSYSTEM/PRESERVATION VALUES
  - 15168 RELATIVE IMPACTS OF COMPETING USES
  - 15169 SCIENTIFIC CONSENSUS

**PLANN 16000 Relationship to Other National Planning Processes, FS (Q10)**

- 16100 National and regional
  - 16110 Transportation/roads policy
  - 16120 Planning regulations
  - 16130 Interior Columbia River Basin Ecosystem Management Plan

**PLANN 17000 Agency Organization and Funding**

- 17100 Funding for Forest Service (*likelihood of future funding; budget allocation; revise funding*)
  - 17110 Tax-based funding
  - 17120 Fee-based funding/fee demo areas (recreation, etc.)
  - 17130 Other sources of revenue
  - 17140 Use of volunteers
- 17200 Funding for Roadless ANPR (*reference to existing and potential funding sources*)
  - 17210 Funding for the proposed rule
  - 17220 Cost of implementation of final rule (*reference to projected or assumed costs of implementation to agency; for impacts to business, etc. see ECONO*)
  - 17230 Monitoring and enforcement (*funding of only*)
  - 17240 Effects on other forest funding priorities
- 17300 Organization structure and staffing

**LEGAL 20000 Relationship to Applicable Laws, Regulations and Policies** (*for general comments or laundry lists only, specific comments should be coded to the resource*)

- 20100 Constitution
- 20200 Federal laws, acts, and policies

- 20201 NFMA (*National Forest Management Act*)
- 20202 MUSYA (*Multiple Use and Sustained Yield Act*)
- 20203 NEPA (*National Environmental Policy Act*)
- 20204 Organic Act
- 20205 FLPMA (*Federal Land Policy and Management Act*)
- 20206 Wilderness Act (*including state wilderness acts*)
- 20207 ANILCA (*Alaska Native Interest Lands Conservation Act*)
- 20208 RS 2477
- 20209 APA (*Administrative Procedures Act*)
- 20210 ADA (*Americans with Disabilities Act*)
- 20211 FACAA (*Federal Advisory Committee Act*)
- 20212 FOIA (*Freedom of Information Act*)
- 20213 Civil Rights Act
- 20214 National Outdoor Recreation Act
- 20215 Government Performance and Results Act
- 20216 Paperwork Reduction Act
- 20217 RFA (*Regulatory Flexibility Act*)
- 20218 SBREFA (*Small Business Regulatory Enforcement Fairness Act*)
- 20219 Unfunded Mandates Reform Act
- 20220 CAA (*Clean Air Act*)
- 20221 CWA (*Clean Water Act*)
- 20222 ESA (*Endangered Species Act*)
- 20223 Mining laws and regulations
- 20300 Executive orders
- 20400 State and local laws
- 20500 Forest Service manuals, handbooks etc.

## **DESIG 25000 Designating Management Categories/Allocations (Q8)**

- 25100 Current legal and administrative guidance
  - 25110 Sufficient
  - 25120 Insufficient
- 25200 Recommend as wilderness
  - 25210 All RAs
  - 25220 Qualifying RAs
  - 25230 Forest-by-forest determination
  - 25240 No RAs
- 25300 Create specific roadless MA allocation(s) (*Backcountry, Primitive, etc.*)
  - 25310 Forest-by-forest
  - 25320 Do not create special allocations
  - 25330 Use existing forest MA categories
  - 25340 Forest discretion/case-by-case/apply MAs as appropriate
  - 25350 Special interest areas (*Research Natural Areas, Recreational Non-motorized, Wild and Scenic, etc.*) (*less intensive uses*)
  - 25360 Timber production, wildlife habitat, motorized recreation, etc. (*more intensive uses*)

**NADIS 30000 Natural Disturbance Processes and Forest Health (Q3)**

- 30100 Forest health, general comments
  - 30110 Current conditions/HRV/desired conditions
  - 30120 Differences between ecotypes/cover types
  - 30130 Economic vs. ecological perspectives on forest health
- 30200 Forest management access (*need for access to prevent disturbance*)
- 30300 Role of fire in forested ecosystems
  - 30310 Restoring fire as a natural process
  - 30320 Protection of timber resources from fire
- 30400 Fire management: response policy/decision protocol
  - 30410 Fire management plans (general references, process and integration into forest plans)
  - 30420 Planned ignitions/prescribed fire
  - 30430 Unplanned ignitions (*natural ignitions, wildland fire, etc.*)
- 30500 Mechanical fuel reduction
  - 30510 Fuels reduction, general
    - 30511 EFFICACY OF MECHANICAL TREATMENTS
    - 30512 PRIORITY AREAS
  - 30520 Timber harvest
  - 30530 Thinning
    - 30531 THINNING IN COMBINATION W/PREScribed FIRE
  - 30540 Fire breaks
  - 30550 Slash removal and other harvest prescriptions
  - 30560 Grazing and fine fuel reduction
- 30600 Other risk reduction, FS efforts/responsibility
  - 30610 Prevention and public education
- 30700 Responsibility of private individuals/landowners
- 30800 Risk to FS and natural resource lands from private property
- 30900 Costs of fire management
  - 30910 Suppression efforts
  - 30920 Ecosystem restoration
- 31100 Post-fire treatments
  - 31110 Burned Area Emergency Rehabilitation (BAER) efforts
  - 31120 Salvage logging
- 31200 Insects and disease, general
  - 31210 Role of insects/disease in natural systems
  - 31220 Prevention/treatment/detection
    - 31221 NEED FOR ROADS/ACCESS
    - 31222 HARVEST OF TIMBER RESOURCES TO AVOID LOSS TO INSECTS AND DISEASE
    - 31223 SALVAGE LOGGING (*INSECT OR DISEASE KILLED*)
- 31300 Non-native plants and noxious weeds
  - 31310 Introduction/spread
    - 31311 ROAD/ TRAIL BUILDING
    - 31312 WEED FREE FEED
    - 31313 RECREATION MANAGEMENT

- 31320 Treatment
- 31321 USE OF HERBICIDES

### **PRIVA 35000 Private Property Protection (Urban Interface and Inholdings) (Q4)**

- 35100 Public/firefighter safety (protecting people from fire)
  - 35110 Responsibility of FS
    - 35111 SUPPRESSION
    - 35112 FUELS REDUCTION
    - 35113 PUBLIC EDUCATION
  - 35120 Responsibility of state and local governments
  - 35130 Responsibility of landowners/private citizens
- 35200 Economic loss reduction (*saving homes and private land*)
  - 35210 Responsibility of FS
  - 35220 Responsibility of state and local governments
  - 35230 Responsibility of landowners/private citizens
- 35300 Land exchanges, acquisitions, and conservation easements (*as related to protection*)

### **ACCES 40000 Private Property Access Across National Forest System Lands (Q5)**

- 40100 Existing legal requirements
- 40200 Jan. 2001 Rule exceptions
- 40300 Additional exceptions
- 40400 Minimum means necessary
- 40500 Acquisition of inholdings (*as related to access*)
- 40600 Costs of access roads/mitigation of impacts

### **EVALU 45000 Characteristics of Roadless Areas (Q6)**

- 45100 Roadless area characteristics general
- 45200 General comments about definition of a road
- 45300 General comments about the number of acres
  - 45310 5000 acres
  - 45320 1000 acres
  - 45330 All or any size roadless area
    - 45331 ADJACENT TO WILDERNESS/OTHER PROTECTED AREAS (NATIONAL PARKS, ETC)
  - 45340 Different geographic standards
    - 45341 EAST VS. WEST/100TH MERIDIAN
- 45400 Inventory status
  - 45410 IRA
  - 45420 Uninventoried
  - 45430 Land acquisitions
  - 45440 Most current inventory
- 45500 Prior/currently scheduled management activities
  - 45510 Should disqualify an IRA from rule provisions

- 45511 TIMBER HARVEST/SCHEDULED SALES
- 45512 ROADS
  - 45513 Roded portions of IRAs
  - 45514 Non-system roads and ways (*how can a roadless area have roads?*)
- 45515 TRAILS
- 45520 Should not disqualify an IRA from rule provisions
  - 45521 TIMBER HARVEST/ SCHEDULED SALES
  - 45522 ROADS
    - 45523 Roded portions of IRAs
    - 45524 Non-system roads and ways (restore/ignore)
  - 45525 TRAILS
- 45600 Exemptions of specific areas from a national rule
  - 45610 Do exempt from rule (do not include this area)
    - 45611 SPECIFIC REGIONS, GEOGRAPHIC AREAS
    - 45612 SPECIFIC NATIONAL FORESTS
      - 45613 Tongass
    - 45614 SPECIFIC ROADLESS AREAS
    - 45615 NATIONAL FORESTS WITH AN ROD AND APPEALS UNDERWAY OR COMPLETED
    - 45616 CURRENT OR PROPOSED TIMBER SALES (*I.E. ALLOW THEM TO PROCEED*)
    - 45617 SPECIAL USE PERMIT AREAS (*SUCH AS SKI RESORTS*)
    - 45618 LAND EXCHANGES OR OTHER AGREEMENTS (*I.E. ALLOW THEM TO PROCEED*)
    - 45619 SCIENTIFIC/RESEARCH AREAS OR FACILITIES
  - 45620 Do not exempt from rule (include this area)
    - 45621 SPECIFIC REGIONS, GEOGRAPHIC AREAS
    - 45622 SPECIFIC NATIONAL FORESTS
      - 45623 Tongass
    - 45624 SPECIFIC ROADLESS AREAS
    - 45625 NATIONAL FORESTS WITH AN ROD AND APPEALS UNDERWAY OR COMPLETED
    - 45626 CURRENT OR PROPOSED TIMBER SALES (*I.E. DO NOT ALLOW THEM TO PROCEED*)
    - 45627 SPECIAL USE PERMIT AREAS (*SUCH AS SKI RESORTS*)
    - 45628 LAND EXCHANGES OR OTHER AGREEMENTS (*I.E. DO NOT ALLOW THEM TO PROCEED*)
    - 45629 SCIENTIFIC/RESEARCH AREAS OR FACILITIES

## **ENVIR 50000 Environmental Values, Introduction/General (Q6)**

- 50100 Ecosystem management as guiding policy
- 50200 Multiple use management as guiding policy
- 50300 Short-term vs. long-term productivity/risks
- 50400 Effects on other nations/global environment
  - 50410 Global warming/greenhouse effects
  - 50420 Deforestation/desertification (transfer of effects)

- 50500 Biological diversity (*general comments only; specific comments code to resource*)
- 50510 Ecosystems/ecoregions
- 50520 Size and configuration (island biogeography, fragmentation, etc.)

### **ENVIR 51000 Water and Watersheds**

- 51100 Groundwater
- 51200 Water yield and streamflow
  - 51210 Water rights and diversions (on and off forest)
- 51300 Watersheds
  - 51310 Health, general comments
  - 51320 Water quantity and timing
  - 51330 Flooding
  - 51340 Water quality
    - 51341 MASS WASTING AND SEDIMENTATION
    - 51342 DRINKING WATER SOURCES

### **ENVIR 52000 Air Quality, Soils, and Cave Resources**

- 52100 Air quality
  - 52110 Fire, smoke effects on air quality
  - 52120 Dust and particulates
  - 52130 Contribution of forest stands to air quality
- 52200 Soils
  - 52210 Soil erosion, general (not specific to water quality)
  - 52220 Soil productivity
- 52300 Cave Resources (*Karst formations, limestone*)

### **ENVIR 53000 Terrestrial Wildlife**

- 53100 Wildlife habitat (*quality, quantity, season, including snags & down logs*)
  - 53110 Connectivity/fragmentation
- 53200 Threatened, endangered, proposed and sensitive species
- 53300 Game species (*desired non-native species, harvested species*)

### **ENVIR 54000 Aquatic Wildlife**

- 54100 Wildlife habitat (*quality, quantity, season*)
  - 54110 Connectivity/fragmentation
- 54200 Threatened, endangered, proposed and sensitive species
- 54300 Game species (*desired non-native species, harvested species*)

### **VEGET 60000 Vegetation and Botanical Resources (Q6)**

- 60100 Structural composition, forest canopy species/trees
  - 60110 Early successional
  - 60120 Late successional/old growth
  - 60130 Mid-elevation ecosystems
- 60200 Snags and coarse woody debris (*amount, size, location, etc.*)
- 60300 Botanical resources (non-forest canopy plants and fungi)
  - 60310 Threatened, endangered, proposed and sensitive plants (*TEPS*)
- 60400 Rare and unique communities (*Botanical Special Interest Areas*)
- 60500 Alpine communities
- 60600 Non-forested vegetation

**NRCOM 65000 Natural Resource Commodities**

- 65100 Rangeland resources
  - 65110 Vegetation (*incl. response to grazing*)
  - 65120 Capability, suitability, forage
  - 65130 Restoration
  - 65140 Allotment management
- 65200 Timberland resources, general
  - 65210 Current timber conditions
  - 65220 Timber harvest method
  - 65230 Future of logging
  - 65240 Importance of timber resources in IRAs (*see ECONO for economic values*)
    - 65241 ACREAGE AFFECTED/RELATIVE PORTION OF TIMBER FROM RAS
  - 65250 Forest Service expenditures on timber management (*timber revenue/timber subsidy*)
  - 65260 Timberland suitability
    - 65261 LANDS SUITED/TENTATIVELY SUITED
    - 65262 TIMBERLANDS NOT SUITABLE
    - 65263 SALE QUANTITIES (*ALLOWABLE, PROBABLE, TOTAL SALE PROGRAM*)
  - 65270 Long-term sustained yield capacity (LTSYC)
  - 65280 Best management practices
  - 65290 Importance of other forest products (fuelwood, Christmas trees, etc.)
- 65300 Mining
  - 65310 Legal and administrative framework
  - 65320 Mining access/need for roads
  - 65330 Relative importance of public lands mineral deposits
    - 65331 EXTENT OF DEPOSITS/ESTIMATES
  - 65340 Importance of mining (*see ECONO for economic values*)
  - 65350 Recreational importance of mining (including rock and fossil collecting)
  - 65360 Hazardous materials
  - 65370 Mitigation and reclamation measures/costs

**SOCIO 70000 Social Environment and Values (Q6)**

- 70100 Population and demographics/community types
  - 70110 Urban
  - 70120 Urban interface
  - 70130 Rural
- 70200 Cultural integrity (*community structure and stability*)
- 70300 Maintaining quality of life (*general references*)
  - 70310 Scenic quality
  - 70320 Escape from urban environment
  - 70330 Spiritual/religious values
  - 70340 Family stability/togetherness

- 70400 Future generations (bequest values)
- 70500 Intrinsic value of non-commodity resources (*ecosystems, wildlife, etc. have/don't have inherent right to exist separate from utility or value to humans*)
- 70600 Environmental Justice Executive Order compliance (*management compliance, also general social justice and equal opportunity*)
- 70700 Accessibility/opportunity for elderly/disabled

### **ECONO 75000 Economic Environment and Values (Q6)**

- 75100 Economic diversity/resiliency
- 75200 Economic vulnerability (*assessment and mitigation*)
- 75300 Maintaining community stability (*general references*)
  - 75310 Employment (*job and income changes to communities*)
  - 75320 Business viability
- 75400 Sustaining levels of forest products and services (*need and appropriate levels*)
- 75500 Contribution of/importance to economies/businesses
  - 75510 Timber resources
  - 75520 Grazing/livestock
  - 75530 Mineral resources
  - 75540 Recreation/tourism
- 75600 Subsidies/costs of management to agency or taxpayers
  - 75610 Timber sales (*below cost*)
  - 75620 Grazing/range
  - 75630 Recreation
- 75700 State, county, and local government revenues/costs (*effects on counties/communities*)
  - 75710 Infrastructure costs associated with population growth (*effects on counties/communities*)
  - 75720 Changes in PILT revenue (*effects on counties/communities*)
  - 75730 Changes in 25% fund (*effects on counties/communities*)
- 75800 Non-Market economic values/ecosystem services
- 75900 Cost benefit analysis (*analysis of comparison of cost of Roadless revision and projected benefits*)
- 75950 Effects on other nations/global economy

### **CULTR 80000 Heritage Resources (Q6)**

- 80100 Cultural resources
  - 80110 Potential undiscovered sites
  - 80120 Protection of American Indian heritage sites
  - 80130 Historic trails
  - 80140 Historic structures

### **TRIBL 85000 American Indian Rights and Interests (Q6)**

- 85100 Federal trust responsibilities
  - 85110 Treaty rights
- 85200 Management of special forest products of interest (including protection of culturally important species)

- 85210 Hunting, fishing, grazing, gathering rights and interests (*medicinal plants*)
- 85220 Role of fire
- 85230 Endangered Species Act conservation measures (*protection of treaty guarantees*)
- 85240 Traditional and cultural species of interest to American Indians
- 85300 Native American use of public lands
  - 85310 Cultural interests
    - 85311 PROTECTION OF TRADITIONAL CULTURAL RESOURCES/HISTORIC USE AREAS
    - 85312 ACCESS TO TRADITIONAL CULTURAL RESOURCES/HISTORIC USE AREAS
  - 85320 Economic interests
  - 85330 Traditional interests
  - 85340 Spiritual interests
  - 85350 Government interests

### **ACTIV 90000 Human Uses and Management Activities (Q7)**

- 90100 Allow activities general or multiple
- 90110 Prohibit/restrict activities general or multiple
- 90120 Allow road construction general
  - 90121 Temporary roads
- 90130 Prohibit/restrict road construction
  - 90131 Temporary roads
- 90210 Allow road reconstruction
- 90220 Prohibit/restrict road reconstruction
- 90310 Allow road closure/removal/decommissioning
- 90320 Prohibit/restrict road closure/removal/decommissioning
- 90410 Allow trail construction general
  - 90411 Motorized
  - 90412 Mechanized
  - 90413 Non-motorized
- 90420 Prohibit/restrict trail construction general
  - 90421 Motorized
  - 90422 Mechanized
  - 90423 Non-motorized
- 90510 Allow timber harvest, general
  - 90511 Current timber sales
  - 90512 Proposed timber sales
  - 90513 Even-aged management (clearcuts)
  - 90514 Uneven-aged management
  - 90515 Stewardship
  - 90516 Helicopter
- 90520 Prohibit/restrict timber harvest, general
  - 90521 Current timber sales
  - 90522 Proposed timber sales
  - 90523 Even-aged management (clearcuts)

- 90524 Uneven-aged management
- 90525 Stewardship
- 90526 Helicopter
- 90610 Allow livestock grazing
- 90620 Prohibit/restrict livestock grazing
- 90710 Allow exploration/development for minerals/oil and gas
- 90711 Open withdrawn areas
- 90720 Prohibit/restrict exploration for minerals
- 90721 Withdraw RAs
- 90810 Allow ski area permits/expansion
- 90820 Prohibit/restrict ski area permits/expansion
- 90910 Allow recreational facilities development (campgrounds, etc.)
- 90920 Prohibit recreational facilities development (campgrounds, etc.)
- 91110 Allow recreational activities, general or multiple
- 91120 Prohibit recreational activities, general or multiple
- 91210 Allow recreation activities, specific
  - 91211 Motorized activities
    - 91212 SUMMER
    - 91213 WINTER
  - 91214 Mechanized activities
  - 91215 Equestrian activities
  - 91216 Outfitter/guide permits
  - 91217 Competitive or group events
- 91220 Prohibit/restrict recreation activities, specific
  - 91221 Motorized activities
    - 91222 SUMMER
    - 91223 WINTER
  - 91224 Mechanized activities
  - 91225 Equestrian activities
  - 91226 Outfitter/guide permits
  - 91227 Competitive or group events
- 91310 Allow hunting/fishing
- 91320 Prohibit/restrict hunting/fishing
- 91410 Allow animal damage control
- 91420 Prohibit/restrict animal damage control
- 91510 Allow communication site designations and developments
- 91520 Prohibit/restrict communication site designations and developments
- 91610 Allow hydroelectric development
- 91620 Prohibit/restrict hydroelectric development
- 91710 Allow utility facilities/corridors
- 91720 Prohibit/restrict utility facilities/corridors

## Alternative Field

This code is used to identify comments specific to the ten questions identified in the Federal Register.

XX – Multiple questions or no specific questions mentioned

01 – Question 1

02 – Question 2

03 – Question 3

04 – Question 4

05 – Question 5

06 – Question 6

07 – Question 7

08 – Question 8

09 – Question 9

10 – Question 10

# Appendix C Public Concern List

## Introduction

Public Concerns are derived directly from public comment. Each represents the gist of a statement of concern made by the public. Concerns may be derived from one person’s input, but often represent the view of many respondents. They are intended to aid decision makers in characterizing the issues to be analyzed. They may also provide a framework for preparing responses to public comment. Primarily, public concerns serve to guide readers to public comment on specific topics. As such, this index is intended to be used as a cross reference to public concerns listed in Chapters 1-6 of the Summary of Public Comment. Readers may identify their areas of concern within the list provided in this index and then reference the relevant portion of the summary document. There they will find sample quotes in support of the concern statement. Each sample quote includes a letter number reference should users wish to look at the original letter on file at the office of the Content Analysis Team (CAT) in Salt Lake City.

<b>CHAPTER 1 INTRODUCTION TO NATIONAL ROADLESS PROTECTION RULEMAKING</b>	<b>1-1</b>
NATIONAL ROADLESS PROTECTION – GENERAL REMARKS.....	1-1
Need for a National Roadless Rule General .....	1-1
1. Public Concern: The Forest Service should clarify the need for a national roadless rule.....	1-1
Because existing law already mandates environmental protection .....	1-2
Because existing law already provides for adequate public involvement in forest management decisions.....	1-2
Develop a National Roadless Rule .....	1-2
2. Public Concern: The Forest Service should develop a national roadless rule. ....	1-2
Because once these areas are gone they’re gone forever .....	1-2
Because individual states are unable to adequately protect roadless areas .....	1-3
Because most National Forest System lands are already managed for multiple uses .....	1-3
Because roadless areas are needed to preserve environmental and human values .....	1-3
Because the majority of citizens enjoy using roadless areas.....	1-3
To settle controversies regarding roadless areas.....	1-4
Do Not Develop a National Roadless Rule .....	1-4
3. Public Concern: The Forest Service should not develop a national roadless rule. ....	1-4
Because current law adequately protects the environment .....	1-4

Because the National Forest Management Act already adequately provides for public input ..... 1-4

Because the courts have established that national forests are not wholly dedicated to recreational and environmental values ..... 1-4

Because forests are in better shape now than at any other time in recent history..... 1-5

Because the Agency already has enough regulatory control and management authority to protect these areas ..... 1-5

4. Public Concern: The Forest Service should delay development of another national roadless rule ..... 1-5

    Until judicial resolution of the Roadless Area Conservation Rule ..... 1-5

    Until forest plan revision processes take place ..... 1-5

Need for the Roadless Area Conservation Rule ..... 1-5

*Need for the Roadless Area Conservation Rule General* ..... 1-7

5. Public Concern: The Forest Service should clarify the need for the Roadless Area Conservation Rule. .... 1-7

    Because the rule does not address the stated purpose and need ..... 1-7

    Because only a small percentage of roadless areas is projected to be developed between 2000 and 2004 ..... 1-7

6. Public Concern: The Forest Service should explain how current management does not provide the protection which it is the purpose and need of the Roadless Area Conservation Rule to provide..... 1-8

*Implement the Roadless Area Conservation Rule* ..... 1-8

7. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule as it now stands. .... 1-8

    Because only a national rule can guarantee protection of national forests through changing politics and personnel ..... 1-9

    Because it provides consistent standards ..... 1-9

    Because the five principles of roadless conservation have already been followed ..... 1-10

    Because it is based on the best available science ..... 1-10

    Because once these places are gone they're gone forever ..... 1-10

    Because it is long overdue ..... 1-10

    To avoid repeating mistakes of the past..... 1-11

    Because it represents a balanced approach to forest conservation ..... 1-11

    Because it still leaves ample area for other uses ..... 1-12

    Because it adequately protects other interests..... 1-12

    Because so much forest land has already been Actively managed ..... 1-13

    Because wilderness areas are too high in elevation and too far separated from each other to adequately preserve biodiversity and wilderness recreation ..... 1-13

    Because Roadless areas serve a different purpose than wilderness areas ..... 1-13

    Because the original process was sufficiently local..... 1-13

    Because it represents the will of the people ..... 1-14

Because roadless areas in eastern forests are so scarce ..... 1-15

Because it preserves the status quo..... 1-15

8. Public Concern: The Forest Service should recognize that the Court’s concerns do not justify a departure from the Roadless Area Conservation Rule..... 1-15

9. Public Concern: The Forest Service should consider that revisiting the Roadless Area Conservation Rule will have negative effects. .... 1-16

It is a waste of taxpayer money ..... 1-16

It will weaken public trust in the federal government ..... 1-16

It will weaken public trust in the Forest Service planning process ..... 1-16

It will polarize the political climate and incite people to radical actions ..... 1-16

10. Public Concern: The Forest Service should recognize that many groups support the Roadless Area Conservation Rule. .... 1-17

Some western governors..... 1-17

Local residents ..... 1-17

Average citizens ..... 1-18

Tribes ..... 1-18

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        Rather than politicians ..... 3-6

        Rather than the public ..... 3-6

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        As professionals, rather than referees between competing interests ..... 3-7

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    To address local conditions ..... 3-10

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    To maintain consistency in forest plans ..... 3-10

    Due to the polarization of the issues ..... 3-10

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213.Public Concern: The Forest Service should keep politics out of the decisionmaking process. .... 3-13

214.Public Concern: The Forest Service should consider that the way it handled the Roadless Area Conservation Rule has severely damaged its public relations and community support. .... 3-14

215.Public Concern: The Forest Service should consider that local managers felt constrained to identify roadless areas during development of the Roadless Area Conservation Rule. .... 3-15

216.Public Concern: The Forest Service should address the public’s suspicions regarding the *real* motivation behind this round of comment. .... 3-15

217.Public Concern: The Forest Service should acknowledge its bias toward commercial interests. .... 3-16

218.Public Concern: The Forest Service should avoid asking the same questions until it gets the desired answer. .... 3-17

219.Public Concern: The Forest Service should work to regain the public’s confidence. .... 3-17

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By being honest about the roaded/unroaded status of areas ..... 3-18

By considering public concerns and managing users and resources fairly ..... 3-19

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221.Public Concern: The Forest Service should be abolished or replaced..... 3-19

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223.Public Concern: The Forest Service should tailor the level of decisionmaking to the scope of the issues. .... 3-21

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225. Public Concern: The Forest Service should make management decisions at the local level. .... 3-22

    Because it is not the role of the Washington Office to micromanage resources ..... 3-22

    Because national management will not result in protection of the values people really care about..... 3-23

    To ensure that government actions do not interfere with the objectives of local planning efforts ..... 3-23

    Because it is required by the National Forest Management Act..... 3-23

    Because different areas have different conditions and needs ..... 3-24

    Because local planners have a better understanding of local needs and concerns regarding land management ..... 3-25

    Because different areas have different use demands ..... 3-26

    Because a management change in roadless areas may adversely affect the remaining areas of the forest..... 3-26

    Because professional forest managers are trained for many years ..... 3-26

    Because greater weight should be placed on the greater forest experience..... 3-27

    Because local residents have the most knowledge about the resources and the most to lose if a bad decision is made ..... 3-27

    Because local residents know how their forests have been used through time ..... 3-27

    Because roadless areas are vital to adjacent communities..... 3-27

    Because national planning does not allow an adequate timeframe to consider impacts on individual roadless areas ..... 3-28

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226. Public Concern: The Forest Service should consider that localizing decisionmaking requires that current law be revised. .... 3-28

227. Public Concern: The Forest Service should allow local decisionmaking only if an easily accessible appeals process is in place..... 3-28

228. Public Concern: The Forest Service should develop regional guidance for implementing the Roadless Area Conservation Rule..... 3-28

    Which recognizes the different conditions and management needs of forests in different areas of the country ..... 3-29

229. Public Concern: The Forest Service should allow local districts to manage forests under a sustainable yield harvest plan..... 3-29

    To enable districts to be economically self-sufficient..... 3-29

230. Public Concern: The Forest Service should allow individual national forests to opt out of the Roadless Area Conservation Rule. .... 3-29

    Or to make local exceptions to the Rule’s prohibitions ..... 3-29

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232. Public Concern: The Forest Service should recognize that “local expertise” may or may not be superior to professional Forest Service expertise. .... 3-30  
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 With regular and on-going natural resource inventories and assessments ..... 3-32

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 While allowing forest supervisors to nominate areas suitable for designation ..... 3-32  
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 Because the fragmentation created by roads transcends local and regional management..... 3-36  
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 Because local interests may be tied to the profit motive of local interests and not represent the collective will of the state or the nation..... 3-36  
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Because local planning has resulted in an \$8.5 billion road maintenance backlog ..... 3-38

Because regional or national personnel have better access to qualified scientific opinion ..... 3-38

Because local planners are often incompetent..... 3-38

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245.Public Concern: The Forest Service should clarify that, with the Roadless Area Conservation Rule, many management decisions would continue to be made through the forest planning process..... 3-41

246.Public Concern: The Forest Service should ensure that decisions reached through the local planning process cannot easily be changed by Congress..... 3-42

247.Public Concern: The Forest Service should recognize that the local forest planning process is complementary and consistent with the Roadless Area Conservation Rule. .... 3-42

And can proceed in tandem with the full implementation of the Rule .... 3-42

248.Public Concern: The Forest Service should recognize that the National Forest Management Act does not mandate local forest planning..... 3-42

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253. Public Concern: The Forest Service should make efforts to remove institutional impediments to implementing existing forest plans..... 3-44

254. Public Concern: The Forest Service should use the National Forest Management Act processes in developing forest plans rather than the Forest Service Manual 7710 road management policy. .... 3-44

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259. Public Concern: The Forest Service should open all local forest planning processes to the American public at large..... 3-45

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To assess the impacts of a proposed action ..... 3-46

To resolve roadless issues ..... 3-46

To maintain maximum amounts of remaining roadless areas ..... 3-46

To protect roadless areas..... 3-46

To restore natural processes to roadless areas ..... 3-47

To protect public lands from undue use..... 3-47

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To determine roadless suitability, recreation opportunity, and desired future conditions ..... 3-48

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To ensure fairness ..... 3-55

To ensure honesty ..... 3-55

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By adequately publicizing proposed actions and opportunities to comment ..... 3-56

By utilizing mass media..... 3-56

By accepting input through all mediums of communication..... 3-57

By using an informal method of communication..... 3-57

By adequately soliciting public involvement..... 3-57

By using surveys to solicit public comment ..... 3-57

By conducting nationwide polling ..... 3-57

By using simple English rather than agency jargon ..... 3-58

By giving due consideration to all relevant information and perspectives ..... 3-58

By emulating the Bureau of Land Management ..... 3-58

By emulating the White Mountain National Forest..... 3-58

By requiring participants to interact ..... 3-58

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As mandated by the National Environmental Policy Act ..... 3-58

265.Public Concern: The Forest Service should recognize that public involvement efforts for the Roadless Area Conservation Rule were more than adequate..... 3-59

266.Public Concern: The Forest Service should recognize that the public involvement process under the National Environmental Policy Act is biased in favor of local interests. .... 3-60

*Adequacy/Availability of Information* ..... 3-60

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269.Public Concern: The Forest Service should establish consistent terminology and reporting procedures for advance notices. .... 3-62

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278.Public Concern: The Forest Service should televise public  
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279.Public Concern: The Forest Service should conduct day-long  
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280.Public Concern: The Forest Service should hold a national public  
convention. .... 3-66

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281.Public Concern: The Forest Service should allow an adequate  
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To ensure a fair and open process..... 3-66

282.Public Concern: The Forest Service should extend the comment  
period. .... 3-66

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To 180 days ..... 3-67

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283.Public Concern: The Forest Service should recognize that  
extending the comment period would work against the Roadless  
Area Conservation Rule. .... 3-67

284.Public Concern: The Forest Service should recognize that the  
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short. .... 3-67

285.Public Concern: The Forest Service should recognize that an additional comment period would be insufficient to address the deficiencies in the Roadless Area Conservation Rule Final EIS..... 3-68

286.Public Concern: The Forest Service should notify previous respondents to the Roadless Area Conservation Rule of the comment period for the Advance Notice of Proposed Rulemaking..... 3-68

*Adequacy of Timeframe* ..... 3-68

287.Public Concern: The Forest Service should recognize that the time frame for comment on the Roadless Area Conservation Rule was adequate..... 3-68

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310.Public Concern: The Forest Service should disclose the details of late submissions. .... 3-78

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443.Public Concern: The Forest Service should recognize that the Advance Notice of Proposed Rulemaking misrepresents the value of roadless areas. .... 4-9

444.Public Concern: The Forest Service should assign value to actual scientific measured valuation, not “perceived” value. .... 4-10

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445.Public Concern: The Forest Service should define social value and ecological value. .... 4-10

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447.Public Concern: The Forest Service should distribute copies of the detailed maps of inventoried roadless areas that are currently on file in the Washington Office. .... 4-11

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448.Public Concern: The Forest Service should acknowledge that adequate maps were made available to the public. .... 4-11

449.Public Concern: The Forest Service should recognize the inadequacy of maps in the Roadless Area Conservation Rule Final EIS..... 4-12

450.Public Concern: The Forest Service should adjust roadless area boundary lines where needed..... 4-12

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452.Public Concern: The Forest Service should make roadless area boundaries obvious. ....4-14  
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454.Public Concern: The Forest Service should not delineate roadless areas on a map. ....4-15  
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1435. Public Concern: The Forest Service should provide empirical studies to support the claim that thinning small-diameter trees will restore ecological processes, provide habitat for endangered species, and avert catastrophic wildfire. .... 6-16  
 Because otherwise, local employees may exploit areas in the name of forest health..... 6-16

1436. Public Concern: The Forest Service should bring together a bi-partisan group to discuss forest management tools and to make science-based recommendations. .... 6-17  
 For forest health ..... 6-17

1437. Public Concern: The Forest Service should allow staff scientists to make recommendations about forest health and other situations, and then allow the general public to comment on those recommendations. .... 6-17

*Adequacy of Analysis – Concepts*..... 6-17

1438. Public Concern: The Forest Service should define “healthy.”..... 6-17  
 As the meaning may vary according to an industrial or an ecological perspective ..... 6-17  
 As the meaning may vary according to management objectives on each site ..... 6-18

1439. Public Concern: The Forest Service should go beyond the traditional concept of “healthy forests” to embrace the concept of healthy ecosystems and natural processes. .... 6-18

1440. Public Concern: The Forest Service should measure forest health in terms of clean water, biodiversity, and solitude. .... 6-19

1441. Public Concern: The Forest Service should define temporary and short-term treatments. .... 6-19

1442. Public Concern: The Forest Service should acknowledge the concept of natural disturbance regimes. .... 6-19

*Funding*..... 6-19

1443. Public Concern: The Forest Service should consider that policy changes, and attendant litigation, have cost a great deal of money that could have gone to forest health treatments. .... 6-19

1444. Public Concern: The Forest Service should hold litigants responsible for the damages caused by their lawsuits that prevent forest health treatment or management activities. .... 6-20

Because management of national forests will continue to be stifled,  
 further exacerbating forest health..... 6-20

*Active Management*..... 6-20

1445. Public Concern: The Forest Service should actively manage  
 natural resources in roadless areas..... 6-20

By evaluating practices in other states ..... 6-20

By using information from its extensive database on wildfire and  
 insect risk and elements from the national fire plan ..... 6-20

By considering the site-specific characteristics of each forested  
 area ..... 6-20

By actively managing to control insects, disease, and fire ..... 6-21

By taking specific areas out of roadless designation to minimize  
 insects, disease, and fire..... 6-22

By allowing the responsible harvest of trees and wildlife ..... 6-22

By cleaning up woody debris..... 6-22

By relying on access other than roads ..... 6-22

By working with state and local governments to actively improve  
 forests and rangelands..... 6-23

Because unmanaged lands and wildlife will suffer ..... 6-23

1446. Public Concern: The Forest Service should allow helicopters in  
 roadless areas..... 6-23

To harvest dead trees and fuels or to pile and burn ..... 6-23

*Ecosystem/Restoration Management*..... 6-23

1447. Public Concern: The Forest Service should utilize best  
 management practices..... 6-23

To reduce the risk of catastrophic events..... 6-23

1448. Public Concern: The Forest Service should restore forest  
 health..... 6-24

1449. Public Concern: The Forest Service should recognize that  
 forest health does not require the destruction of old growth  
 vegetation..... 6-24

1450. Public Concern: The Forest Service should use conditions that  
 existed just prior to Euro-American contact as a baseline for  
 management. .... 6-24

To avoid unforeseen and negative consequences ..... 6-24

1451. Public Concern: The Forest Service should consider that  
 permitting states and local jurisdictions to develop lands adjacent  
 to national forests interferes with natural forest health processes. .... 6-24

1452. Public Concern: The Forest Service should replant burned or  
 cut timber areas..... 6-24

1453. Public Concern: The Forest Service should find a variety of  
 low-resource using, non-polluting alternatives to road-based  
 management practices..... 6-25

*Ecosystem/Restoration Management – Roadless Areas*..... 6-25

1454. Public Concern: The Forest Service should protect roadless  
 areas. .... 6-25

Because once areas are roaded, they are extremely difficult to restore ..... 6-25

1455. Public Concern: The Forest Service should not actively manage natural resources in roadless areas. .... 6-25

    Allow natural ecosystem processes to operate ..... 6-25

    Remove barriers to natural processes ..... 6-26

    Because of the lack of funding ..... 6-26

1456. Public Concern: The Forest Service should restore roadless areas damaged by past management practices. .... 6-26

    By allowing natural processes to operate ..... 6-26

    To improve forest health ..... 6-27

1457. Public Concern: The Forest Service should close loopholes in the Roadless Area Conservation Rule for stewardship logging and fire suppression. .... 6-27

1458. Public Concern: The Forest Service should consider that human activities cause more damage in roadless areas than natural processes. .... 6-28

    Roaded access causes more damage ..... 6-28

    Timber removal causes more damage ..... 6-29

*Management Exceptions* ..... 6-30

1459. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule provides resource management exceptions ..... 6-30

    To restore ecological processes ..... 6-30

    To preserve access rights ..... 6-31

    To control fires and insects ..... 6-31

1460. Public Concern: The Forest Service should consider that the road building and timber removal exceptions to the Rule are too narrow to provide the needed flexibility ..... 6-31

    Include a policy statement that allows local forest supervisors to tailor forest plans and respond to local circumstances ..... 6-31

1461. Public Concern: The Forest Service should define specific national criteria for management exceptions requiring roads in designated roadless areas ..... 6-31

1462. Public Concern: The Forest Service should constrain exceptions to Roadless Area Conservation Rule regulations by specific conditions and restrictions. .... 6-31

    Including time limits, spatial limits, detailed descriptions, and monitoring and reporting ..... 6-31

Roads/Access – Forest Health Management ..... 6-33

*Roads/Access General* ..... 6-33

        1463. Public Concern: The Forest Service should address the impacts of new roads in roadless areas on forest fires ..... 6-33

*Funding* ..... 6-33

    1464. Public Concern: The Forest Service should consider that budget constraints and prohibitions on road development and

maintenance will render many projects unfeasible and impose unacceptable risk on many roadless areas. .... 6-33

*Allow Roads/Access* ..... 6-34

1465. Public Concern: The Forest Service should allow road construction/access. .... 6-34

For forest health management ..... 6-34

For resource management ..... 6-35

For fire hazard reduction ..... 6-35

For the use of helicopters for fire management ..... 6-36

For firefighter and public safety ..... 6-36

For pest management ..... 6-36

To allow response to additional hazards such as landslides, earthquakes, etc. .... 6-36

To allow cost-effective forest health treatments that can provide long-term protection of watershed quality ..... 6-37

To Remove dead timber ..... 6-37

With the restriction that roads be open only for fire protection and emergencies ..... 6-37

Because otherwise state agencies may not allow their firefighters to assist with firefighting efforts on federal lands ..... 6-37

1466. Public Concern: The Forest Service should allow road construction/access. .... 6-38

Low impact roads ..... 6-38

Temporary roads ..... 6-38

1467. Public Concern: The Forest Service should include an alternative in the National Environmental Policy Act process that gives direction for road construction. .... 6-38

For forest health management ..... 6-38

1468. Public Concern: The Forest Service should allow the use of motorized vehicles. .... 6-38

For forest health management ..... 6-38

For forest health management only, with access prohibited unless authorized by a forest plan ..... 6-39

Allow heavy equipment for fire containment and other management needs ..... 6-39

To facilitate firefighting in wilderness areas ..... 6-39

1469. Public Concern: The Forest Service should comply with Revised Statute 2477. .... 6-39

To maintain motorized access for forest health management ..... 6-39

1470. Public Concern: The Forest Service should modify the criteria for roadless designation to allow the construction of new roads for fire and disease management. .... 6-39

Because they are less damaging than roads constructed during firefighting ..... 6-39

1471. Public Concern: The Forest Service should maintain trails. .... 6-39

For forest health ..... 6-39

*Do not Allow Roads/Access* ..... 6-40

1472. Public Concern: The Forest Service should not use forest health as an excuse to build roads in roadless areas. .... 6-40

    Because it is cost prohibitive ..... 6-40

    Because fires will burn areas regardless of their roaded/roadless designation ..... 6-40

    In the Tongass National Forest ..... 6-40

1473. Public Concern: The Forest Service should prohibit road construction. .... 6-41

    Because roads can spread disease and noxious weeds ..... 6-41

    Because roads and disturbances enable exotic plants and animals to enter previously undisturbed areas..... 6-42

    Because boat trailers can introduce exotic species to watersheds and lakes ..... 6-42

    Because adequate roads exist and are not needed for fire suppression ..... 6-42

    Because Forest Service personnel can access roadless areas by other means ..... 6-43

    Because helicopters can be used for controlled burns and air tankers can be used for fire suppression..... 6-43

    Because roads won't stop fires..... 6-43

    As a good way to manage wildfires ..... 6-44

1474. Public Concern: The Forest Service should obliterate any roads or temporary access required for forest health management as soon as possible after the event. .... 6-44

1475. Public Concern: The Forest Service should prohibit vehicles in roadless areas. .... 6-45

    To prevent arson and wildfires ..... 6-45

    To prevent the spread of plant pathogens ..... 6-45

Timber Removal ..... 6-46

*Timber Harvest General*..... 6-47

    1476. Public Concern: The Forest Service should not allow volume and revenue targets to drive silvicultural decisions..... 6-47

        Because commercial harvesting usually takes the most fire-resistant trees ..... 6-47

*Adequacy of Analysis*..... 6-47

    1477. Public Concern: The Forest Service should recognize that fuel buildup and undergrowth is natural for forest progression and forest ecology. .... 6-47

        Do not place blame on commercial timber removal..... 6-47

        Consider other factors that contribute to fuel build up ..... 6-47

    1478. Public Concern: The Forest Service should analyze the benefits and harm of thinning and clearing projects..... 6-48

        Before undertaking any action ..... 6-48

    1479. Public Concern: The Forest Service should consider that scientific evidence does not support the hypothesis that intensive

salvage, thinning, and other harvesting activities reduce the risk of catastrophic fire. .... 6-48

*Funding*..... 6-48

1480. Public Concern: The federal government should fund Forest Service thinning projects. .... 6-48

    To remove fuel build up..... 6-48

1481. Public Concern: The Forest Service should address the increased costs of fuel treatment..... 6-48

1482. Public Concern: The Forest Service should fine previous timber harvesters..... 6-48

    To recover any future loss due to severe wildfires, buildup of hazardous fuels, and any insect or disease damage ..... 6-48

*Allow Timber Removal*..... 6-49

1483. Public Concern: The Forest Service should allow timber removal..... 6-49

    To reduce fires, insects, and disease ..... 6-49

    To restore a natural fire regime ..... 6-50

    To ensure firefighter safety..... 6-50

    By removing 24” trees on the stump and using the money to pay for road repair..... 6-51

    By removing timber less than 14 inches in diameter or 50 years of age ..... 6-51

    By removing mature trees before their commercial value is gone, accompanied by controlled burning to reduce fuel ..... 6-51

    By removing old growth..... 6-51

    By removing every sixty years and clearing underbrush every twenty years ..... 6-51

    By allowing small scale timber removal..... 6-51

    By identifying and removing timber that can be harvested without environmental harm ..... 6-52

    By employing sustainable timber harvesting techniques for forest health ..... 6-52

    With helicopters..... 6-52

    With horses ..... 6-53

1484. Public Concern: The Forest Service should reduce the basal area index of stands of trees. .... 6-53

    To make trees more resistant to insects and disease ..... 6-53

1485. Public Concern: The Forest Service should allow clear cutting..... 6-53

    In less than five acre, widely dispersed parcels ..... 6-53

1486. Public Concern: The Forest Service should allow salvage removal..... 6-53

    For forest health ..... 6-53

    As soon as possible after a fire ..... 6-54

    To utilize the timber before it rots ..... 6-54

    To thin old growth..... 6-54

    Without creating new roads..... 6-55

With environmentally friendly techniques ..... 6-55  
 In areas where insect and disease outbreaks will be intense ..... 6-55  
 1487. Public Concern: The Forest Service should allow selective  
 timber harvest. .... 6-55  
 To keep forests thinned and fire free ..... 6-56  
 To remove dead and dying timber ..... 6-56  
 To provide barriers to fires and provide a safe haven for wildlife ..... 6-56  
 1488. Public Concern: The Forest Service should thin fuels. .... 6-56  
 As necessary ..... 6-56  
 Ten percent every ten years ..... 6-56  
 Year-round ..... 6-56  
 Thin trees and brush less than ten inches in diameter ..... 6-57  
 Allow restoration thinning programs ..... 6-57  
 Pile the brush and burn in the winter ..... 6-57  
 To reduce unnatural fuel loads in roaded areas ..... 6-57  
 If studies indicate thinning is beneficial..... 6-58  
 Within a half mile of major developed areas ..... 6-58  
 In the urban interface area ..... 6-58  
 In wilderness areas..... 6-58  
 1489. Public Concern: The Forest Service should allow firewood  
 collection..... 6-58  
 To reduce fuel loads and fire hazards ..... 6-58  
 Allow farmers, ranchers, and low-income people to harvest, at no  
 cost, diseased, damaged, or excess trees for firewood rather than  
 using controlled burning as a fuel reductions tool..... 6-59  
 1490. Public Concern: The Forest Service should allow hand removal  
 of woody debris and small diameter understory trees..... 6-59  
 1491. Public Concern: The Forest Service should create defensible  
 fuel zones. .... 6-59  
 With profitable timber sales conducted with over-the-snow  
 equipment..... 6-59  
*Do Not Allow/Restrict Timber Removal*..... 6-59  
 1492. Public Concern: The Forest Service should not use forest  
 health as an excuse to remove timber. .... 6-59  
 Do not claim harvesting is needed to reduce insect infestation ..... 6-59  
 Do not claim harvesting is needed to reduce fuel buildup and  
 undergrowth ..... 6-59  
 1493. Public Concern: The Forest Service should prohibit timber  
 removal. .... 6-60  
 Because timber removal increases fire severity ..... 6-60  
 Prohibit commercial timber removal ..... 6-60  
 1494. Public Concern: The Forest Service should prohibit even age  
 management..... 6-61  
 Because it increases wildfire risk..... 6-61

Because the broken mosaic boundaries of clear cuts increase the mortality of beneficial species and allow insect encroachment on surrounding areas ..... 6-61

1495. Public Concern: The Forest Service should prohibit salvage removal..... 6-61

1496. Public Concern: The Forest Service should prohibit thinning ..... 6-62

In moist or high elevation fir, hemlock, spruce, and cedar forests ..... 6-62

Because thinning to reduce overgrown forests is cost prohibitive ..... 6-62

Because silvicultural activities do more harm than good ..... 6-62

Because roadless areas should not be disturbed..... 6-63

Fire Management..... 6-63

*Fire Management General*..... 6-65

1497. Public Concern: The Forest Service should address fire management. .... 6-65

Because fire impacts regions differently..... 6-65

1498. Public Concern: The Forest Service should address fire management in a national roadless rule..... 6-65

Relative to the national fire program ..... 6-65

Relative to the federal interagency wildland fire policy, the national fire plan, and the 10-year federal/state strategy to address forest ecosystem health ..... 6-65

Because the effect of fire varies by area ..... 6-66

1499. Public Concern: The Forest Service should review the recommendations of the General Accounting Office on reducing wildfire threats and take immediate action..... 6-66

1500. Public Concern: The Forest Service should consider that national grasslands are also at risk for fire danger. .... 6-66

Because fires threaten homes, range improvements, oil and gas structures, vegetation and wildlife habitat, and outlying farm and ranch structures ..... 6-66

1501. Public Concern: The Forest Service should prohibit fires in dry areas. .... 6-66

Ban outdoor burning when there is a lack of moisture ..... 6-66

1502. Public Concern: The Forest Service should consider that the Roadless Area Conservation Rule will not likely result in an increase of wildfires in California. .... 6-67

In addition, continued implementation of the National Fire Plan and the California Fire Plan will increase protection of forests and communities ..... 6-67

*Fire Management General – Management Strategies*..... 6-67

1503. Public Concern: The Forest Service should implement various fire policies and plans. .... 6-67

Implement the 1995 wildlands fire policy..... 6-67

Implement the national fire strategy ..... 6-68

Implement the National Fire Plan ..... 6-68

1504. Public Concern: The Forest Service should change traditional Smokey the Bear fire suppression policies. .... 6-68  
 To solve wildfire problems ..... 6-68

1505. Public Concern: The Forest Service should specify, to the extent possible, the roadless areas in which fire reduction management exceptions would apply ..... 6-69  
 In the forest plan revision process ..... 6-69

1506. Public Concern: The Forest Service should work with all federal agencies, including the National Park Service and the Bureau of Land Management, to set sound and consistent policies for fire management..... 6-70  
 In national parks, wilderness areas, and roadless areas ..... 6-70

1507. Public Concern: The Forest Service should employ the same forest management strategies in roadless areas that are used to protect communities and private property from fires beginning on other lands..... 6-70  
 Because forest fires often begin on developed private lands ..... 6-70  
*Adequacy of Analysis*..... 6-70

1508. Public Concern: The Forest Service should evaluate wildfire risks. .... 6-70  
 Consider that roadless areas do not have a higher risk of wildfire ..... 6-70  
 Consider that there is no causal link between uncontrolled wildfires and the presence or absence of roads ..... 6-72  
 Consider that the majority of roadless areas are not situated in areas of high fire risk ..... 6-72  
 Consider that fire frequency increases as road density increases..... 6-73

1509. Public Concern: The Forest Service should conduct more studies about how to control fires. .... 6-73  
 So that fires do not get out of hand as a result of the many variables that can affect them..... 6-73

1510. Public Concern: The Forest Service should consider the impact of human activities on fire intensity and severity..... 6-73

1511. Public Concern: The Forest Service should consider other factors which may increase fuel loads and fire hazards..... 6-74  
 Wind ..... 6-74  
 Weather ..... 6-74  
 Slash piles ..... 6-74  
 Some tree species have a naturally severe fire regime ..... 6-74  
*Adequacy of Analysis – Management Strategies*..... 6-75

1512. Public Concern: The Forest Service should evaluate its firefighting practices. .... 6-75

1513. Public Concern: The Forest Service should fairly and fully consider the effects of fuel management. .... 6-76  
 Before a final decision on managing areas as roadless is made ..... 6-77

1514. Public Concern: The Forest Service should adequately analyze the appropriateness and need for prescribed fire. .... 6-77

In the unique settings of the roadless areas..... 6-77

1515. Public Concern: The Forest Service should fully analyze restoration projects designed to address catastrophic wildfires..... 6-77

To ensure adequate safeguards are taken to preserve roadless and wilderness qualities of inventoried roadless areas ..... 6-77

1516. Public Concern: The Forest Service should address the cumulative impacts of the fire suppression program on national forests, and how it has impacted roadless areas..... 6-77

1517. Public Concern: The Forest Service should reassess vegetation management on the national grasslands. .... 6-78

Because increasing vegetation height and shrub structure on the uplands affects fire control and suppression ..... 6-78

1518. Public Concern: The Forest Service should evaluate the impacts of no management versus the impacts of roading or other management activities..... 6-78

1519. Public Concern: The Forest Service should conduct ecological assessments. .... 6-78

For all fuel reduction projects ..... 6-78

1520. Public Concern: The Forest Service should categorize inventoried roadless areas in accordance with fire regime, condition class, vegetation, and risk of disease..... 6-78

Areas at greater risk of ecosystem damage from catastrophic fires should be prioritized for appropriate treatment..... 6-78

Then create a management plan to obtain and maintain desired future conditions..... 6-79

1521. Public Concern: The Forest Service should consider that thinning has not been shown to systematically reduce the intensity of wildfires. .... 6-79

1522. Public Concern: The Forest Service should allow public review of the Wildland Fire Management Policy. .... 6-79

*Funding*..... 6-79

1523. Public Concern: The Forest Service should evaluate costs and funding associated with fire management. .... 6-79

Fire suppression costs ..... 6-79

Fire suppression costs and controlled burn funding ..... 6-80

Funding for firefighting ..... 6-80

The use of funds appropriated for fuels reduction projects in the wild-urban interface zone ..... 6-81

Consider that reduced access increases firefighting expenses..... 6-81

Consider that the majority of firefighting funds are spent on protecting structures in developed areas ..... 6-81

1524. Public Concern: The Forest Service should not use tax dollars to fund firefighters and their equipment..... 6-81

Brought in from distant places rather than the local area ..... 6-81

Use the money for other purposes ..... 6-82

1525. Public Concern: The Forest Service should not use tax dollars for fire suppression and timber removal..... 6-82  
 In roadless areas located far from residents..... 6-82

1526. Public Concern: The Forest Service should contract with an independent organization to analyze expenses associated with fire management if roads are destroyed. .... 6-82

1527. Public Concern: The Forest Service should consider that as fuel loads increase in roadless areas, firefighting costs also increase. .... 6-82

1528. Public Concern: The Forest Service should provide funding to conduct controlled burns and non-commercial thinning..... 6-82  
 To reduce wildfire ..... 6-82

1529. Public Concern: The Forest Service should take into account the effects of a national roadless rule on the costs of fire management..... 6-83  
 Negative effects..... 6-83

1530. Public Concern: The Forest Service should ensure that emergency funds are spent in areas where wildfire truly threatens communities..... 6-83

1531. Public Concern: The Forest Service should continue its current fire plan funding to treat fuels in the wild-urban interface..... 6-83

1532. Public Concern: The Forest Service should take legal action against organizations which have blocked fuel load removal. .... 6-83  
 To recover costs for fires that have resulted from such lack of action..... 6-83

*Education* ..... 6-83

1533. Public Concern: The Forest Service should educate the public. ... 6-83  
 About fire safety ..... 6-83  
 About the reasons for controlled burning..... 6-83  
 About the role of fire and disturbance in forests ..... 6-84  
 About what is needed to support firefighting efforts..... 6-84

*Active Management* ..... 6-84

1534. Public Concern: The Forest Service should use various techniques for fire prevention..... 6-84  
 If required by management objectives..... 6-84  
 Monitoring..... 6-84  
 Grazing..... 6-84

1535. Public Concern: The Forest Service should control fire size and frequency on public lands to approximately that of pre-settlement conditions..... 6-85  
 By reducing fuel loads through thinning, grazing, and prescribed burning, and by maintaining natural and engineered firebreaks ..... 6-85

1536. Public Concern: The Forest Service should reduce fire hazards..... 6-85  
 By employing young people ..... 6-85  
 By actively managing to reduce fire hazards ..... 6-86

By developing a fire management plan ..... 6-86

By allowing the clearing of underbrush during the interim ..... 6-86

By allowing many small burns ..... 6-87

By clearing fuel in areas 40-100 meters surrounding communities ..... 6-87

In already roaded and accessible areas adjacent to roadless areas ..... 6-87

Because fires often do more harm than good ..... 6-87

1537. Public Concern: The Forest Service should use prescribed burning techniques as a tool to reduce fire danger..... 6-87

In areas outside of wilderness or roadless areas ..... 6-88

In late fall..... 6-88

In forests which border communities ..... 6-88

Every four to five years ..... 6-88

At low-risk times of the year ..... 6-88

With guidelines established in the forest planning process ..... 6-89

Only after preventative steps to reduce fuel loads are taken, such as harvesting, thinning, and grazing..... 6-89

To reduce the ecological impacts of fires and firefighting..... 6-89

Use techniques that adhere to local fire management plans and that contain monitoring provisions to assess the usefulness of the burns ..... 6-89

1538. Public Concern: The Forest Service should carry out controlled burns. .... 6-89

To manage forest health ..... 6-89

In strips of forest that have previously been harvested, similar to a crop rotation management activity ..... 6-90

In areas where fires have been artificially suppressed ..... 6-90

In areas where the risk for extreme temperatures and intensive volumes of smoke have been addressed ..... 6-90

Where possible, otherwise thin timber without building new roads ..... 6-90

1539. Public Concern: The Forest Service should construct firebreaks..... 6-90

Only if really necessary ..... 6-90

By using roads as firebreaks ..... 6-90

By decommissioning some roads and managing the remaining as a defensible perimeter against wildland fire ..... 6-91

By clearing dead timber and thinning stands next to private property to an appropriate width..... 6-91

By creating a boundary around roadless areas with multiple use, motorized trails ..... 6-91

By maintaining fire lanes but closing them to all but foot traffic ..... 6-91

By encouraging volunteers to assist with fire break maintenance ..... 6-91

Outside of roadless areas ..... 6-91

1540. Public Concern: The Forest Service should allow ski areas located on the fringes of roadless areas to help provide defense zones..... 6-91

Which allow for development while decreasing fuel loads ..... 6-91

1541. Public Concern: The Forest Service should maintain existing fire trails. .... 6-92  
 In the Shawnee National Forest ..... 6-92

1542. Public Concern: The Forest Service should suppress forest fires. .... 6-92  
 Because letting forests burn is not responsible land management..... 6-92  
 By using chemicals to extinguish fires ..... 6-92  
 By allowing fires to burn to a certain landscape feature before suppressing them ..... 6-92  
 By enlisting military aircraft converted into water tankers as a suppression tool ..... 6-93

1543. Public Concern: The Forest Service should concentrate firefighting efforts in urban-forest interface areas..... 6-93  
 Because these areas are already roaded and pose the greatest threat to life and personal property ..... 6-93

1544. Public Concern: The Forest Service should enlist prisoners to clean up dead and dying timber and brush and to construct and maintain trails..... 6-93  
 Materials collected could be used to operate a co-generation power plant..... 6-93

1545. Public Concern: The Forest Service should specify the criteria under which the Roadless Area Conservation Rule exceptions would apply..... 6-94  
 For management activities to reduce the threat of wildfire ..... 6-94

*Ecosystem/Restoration Management* ..... 6-94

1546. Public Concern: The Forest Service should acknowledge that wildfire is a component of a healthy forest..... 6-94

1547. Public Concern: The Forest Service should not suppress forest fires..... 6-95  
 Because natural fire maintains diverse forests and wildlife habitat..... 6-95  
 Because fire rejuvenates ecosystems ..... 6-95  
 Because natural fire regimes should be restored ..... 6-95  
 Because firefighting is a waste of money, dangerous, and harms the environment..... 6-95  
 Because dead timber is a critical part of the forest ecosystem..... 6-95  
 Except in the event of insect or disease infestation that is uncontrollable by natural means..... 6-95  
 Except in the event it is not possible to control the fire, then rely on more air-power ..... 6-95  
 Except in the event the fire is human induced ..... 6-96  
 In remote areas ..... 6-96  
 In wilderness areas..... 6-96  
 Prohibit firebreaks and retardant dumping..... 6-96

1548. Public Concern: The Forest Service should reintroduce fire into forest ecosystems..... 6-96

1549. Public Concern: The Forest Service should manage fire in roadless areas following wilderness fire management policies. .... 6-97  
 By extending the “let burn” policy to roadless areas..... 6-97

1550. Public Concern: The Forest Service should ban the use of fire in roadless areas. .... 6-98

1551. Public Concern: The Forest Service should avoid artificial fires, backburning, and prescribed burning. .... 6-98  
 Because forests in the southeastern United States do not have a fuel load..... 6-98

1552. Public Concern: The Forest Service should protect roadless and roaded areas. .... 6-98  
 By designing restoration projects to manage potential catastrophic wildfires ..... 6-98

1553. Public Concern: The Forest Service should allow a categorical exemption for restoring burned areas. .... 6-99  
 Including needed road building, salvage logging, soil preparation, seeding, planting, riparian restoration, and follow up work to help the survival of seedlings ..... 6-99

*Other*..... 6-99

1554. Public Concern: The Forest Service should utilize burned timber as biomass energy. .... 6-99

Insects, Disease, and Noxious Plants ..... 6-99

*Insects, Disease, and Noxious Plants General*..... 6-100

1555. Public Concern: The Forest Service should not weaken the Roadless Area Conservation Rule. .... 6-100  
 Because the Rule will aid federal, state, and local efforts to combat the spread of noxious weeds..... 6-100

1556. Public Concern: The Forest Service should ensure that its policies support rather than hinder the campaign to minimize damage caused by invasive exotic plants. .... 6-100

1557. Public Concern: The Forest Service should implement standards for insect and disease control. .... 6-101  
 As part of the forest planning process ..... 6-101

1558. Public Concern: The Forest Service should consider that roadless area and transportation regulations and policies interfere with local grazing associations’ work in controlling noxious weeds. .. 6-101  
 Which are a persistent problem on the national grasslands ..... 6-101

1559. Public Concern: The Forest Service should not require horses to be diapered. .... 6-101  
 Because deer and elk also spread seeds in the forest..... 6-101

*Adequacy of Analysis* ..... 6-101

1560. Public Concern: The Forest Service should evaluate the role of insects and disease in a forest ecosystem. .... 6-101

1561. Public Concern: The Forest Service should examine insect and disease outbreaks. .... 6-102

By enlisting the aid of hikers/volunteers to monitor and report outbreaks..... 6-102

By examining outbreaks on foot, horseback, or with the use of aircraft ..... 6-102

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1564. Public Concern: The Forest Service should expand its studies of ecosystem interactions. .... 6-104

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1565. Public Concern: The Forest Service should direct its funding to the management of disease, insects, and noxious plants..... 6-104

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1566. Public Concern: The Forest Service should increase funding for research and development of biological means of preventing and controlling insect and disease..... 6-104

1567. Public Concern: The Forest Service should reallocate money earmarked for timber removal to hiring a staff large enough, and capable enough, of recognizing forest health problems early on..... 6-105

1568. Public Concern: The Forest Service should acknowledge the financial contribution made by off-road vehicle users to noxious plant abatement programs..... 6-105

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1569. Public Concern: The Forest Service should control insects, disease, and noxious plants..... 6-105

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To save game range..... 6-105

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By reintroducing fire to roadless areas ..... 6-105

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1663. Public Concern: The Forest Service should block access to ecologically damaging groups. .... 6-151

1664. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule has no impact on access to state and private inholdings..... 6-151

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1666. Public Concern: The Forest Service should not construct roads for the sole purpose of providing access to private inholdings. .... 6-152

1667. Public Concern: The Forest Service should address its contradictory statements regarding special use permits and public roads. .... 6-152

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1671. Public Concern: The Forest Service should disclose its legal obligations to provide access routes under existing laws. .... 6-155  
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1672. Public Concern: The Forest Service should familiarize personnel with laws regarding access to private lands..... 6-155

1673. Public Concern: The Forest Service should consider that state statutes already ensure access to private property..... 6-155  
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1674. Public Concern: The Forest Service should uphold valid existing rights..... 6-155  
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1675. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule..... 6-155  
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1685. Public Concern: The Forest Service should purchase private inholdings. ....6-159

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1687. Public Concern: The Forest Service should not use Conservation and Reinvestment Act funding to purchase privately owned forest lands. ....6-160

1688. Public Concern: The Forest Service should not force private landowners to sale their property. ....6-160

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1689. Public Concern: The Forest Service should discourage private profiteering over the Agency’s purchase of private property in roadless areas.....6-160

1690. Public Concern: The Forest Service should not succumb to blackmail by private property owners. ....6-160

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1691. Public Concern: The price of private property within roadless areas should reflect the presence or absence of an access route to the property. ....6-161

# Appendix D Demographics

## Introduction

CAT demographic analysis presents an overall picture of respondents; specifically, where they live, their general affiliation to organizations or government agencies, and the manner in which they respond. CAT's database organizes public comments under subject categories (see Appendix B) and demographic information. A report can be generated from the database to show public comments from certain geographic locations or to show comments associated with certain types of organizations. Thus demographic coding combined with comment coding allows use of the database to focus on specific areas of public concern that are linked to geographic areas, organizational affiliations, and response formats.

The total number of responses is as follows:

52,432	original responses
674,008	organized campaign responses
726,440	total responses

It is important to recognize that public comment analysis is not a vote-counting process in which the outcome is determined by the majority opinion. Because respondents are self-selected, they do not constitute a random or representative public sample. The National Environmental Policy Act (NEPA) encourages all interested parties to submit comment as often as they wish regardless of age, citizenship, or eligibility to vote. Respondents may therefore include businesses, people from other countries, children, and people who submit multiple responses. Therefore, caution should be used when interpreting the numbers provided in this report. While demographic 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 strives to identify the concerns raised by all respondents.

CAT 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 (respondents) 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. CAT determines the number of responses received for a given project, the number of respondents, and the number of signatures.

## Organizational Affiliation

Organizational affiliation is tracked for each response.

Table D-1 displays, by organization type, the number of responses and signatures. The first box indicates respondents who write on behalf of themselves or whose affiliation is unclear.

**Table D-1. Number of Responses and Signatures by Organization Type**

<b>Organization Type</b>	<b>Number of Responses</b>	<b>Number of Signatures</b>
Individual/Unaffiliated	51,036	55,763
University/Professional Society	56	59
Federal Agency/Elected Official	45	70
State Agency/Elected Official	114	116
County Agency/Elected Official	204	209
Town/Municipality Agency/Elected Official	72	81
Government Employees, Organizations, and Unions	9	9
Tribal Official/Member	15	15
Agriculture Industry/Association	19	20
Conservation District	2	2
Business	110	1,951
Place Based Group	13	13
Civic Group	39	74
Range/Grazing Organization	10	12
Timber or Wood Products Industry/Association	90	102
Mining Industry/Association	17	18
Oil and Pipeline Industries	12	12
Recreational Non-Motorized Organization	35	38
Recreational Motorized Organization	34	35
Special Use Permittee	23	25
Conservation/Preservation Organization	344	1,209
Utility Group/Organization	11	12
Multiple Use, Wise Use, Land Rights Organization	41	44
Other	14	236
Single Responses signed by Multiple Organizations	67	735
<b>Total</b>	<b>52,432</b>	<b>60,860</b>

## Response Type

CAT tracks response formats. The public uses a variety of response formats including letters, emails, faxes, petitions, resolutions, action alerts, and organized response campaign letters. Tracking response formats allows CAT and its clients to be better prepared for what future projects may bring in terms of number of responses, human resource needs, and computer system needs.

Table D-2 displays, by response format, the number of original responses and signatures. The majority of responses received were letters, followed by emails, faxes, and petitions.

**Table D-2. Number of Responses and Signatures by Response Format**

Response Format	Number of Responses	Number of Signatures
Letter	39,154	42,375
Email	12,601	13,303
Fax	632	847
Petition	38	4,327
Resolution	6	7
Action Alert	1	1
<b>Total Responses</b>	<b>52,432</b>	<b>60,860</b>

## Geographic Representation

Geographic representation is tracked for each response. For petitions, geographic representation is not tracked for each individual signature. Instead, petition signatures are all assigned to the state of the person or organization originating the petition.

Table D-3 displays, by origin, the number of responses and signatures. Note that 3,009 responses did not indicate geographic information.

**Table D-3. Number of Responses and Signatures by Origin**

State	Number of Responses	Number of Signatures
Alabama	256	312
Alaska	1,771	1,834
Arizona	917	957
Arkansas	244	266
California	6,356	6,860
Colorado	3,070	3,646
Connecticut	404	425
Delaware	71	74
District of Columbia	165	205
Federated States of Micronesia	1	1
Florida	1,320	1,386
Georgia	739	793

Guam	1	1
Hawaii	92	94
Idaho	1,261	1,494
Illinois	1,196	1,481
Indiana	406	426
Iowa	287	305
Kansas	203	217
Kentucky	255	263
Louisiana	185	194
Maine	260	276
Maryland	580	600
Massachusetts	932	1,199
Michigan	1,067	1,133
Minnesota	1,125	1,230
Mississippi	80	81
Missouri	561	587
Montana	3,843	4,134
Nebraska	128	135
Nevada	301	345
New Hampshire	466	504
New Jersey	818	1,019
New Mexico	433	476
New York	1,770	1,909
North Carolina	766	813
North Dakota	83	84
Ohio	1,006	1,047
Oklahoma	156	161
Oregon	3,760	6,069
Pennsylvania	1,361	1,461
Puerto Rico	1	1
Rhode Island	108	114
South Carolina	278	290
South Dakota	228	234
Tennessee	515	546
Texas	1,181	1,214
Utah	807	1,583
Vermont	431	475
Virginia	1,254	1,337
Washington	3,920	4,195
West Virginia	260	268
Wisconsin	945	1,249
Wyoming	683	735
International	105	115
Response submitted by Multiple States	67	724
Anonymous/Unknown	2,953	3,383

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<b>Total</b>	<b>52,432</b>	<b>60,860</b>
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## Appendix E Organized Response Report

Organized responses represent 93 percent of the total responses received during the public comment period for the Advance Notice of Proposed Rulemaking (674,008 out of 726,440). Five or more responses received from different individuals but containing identical text, or identical text plus brief additional comments similar in content, are defined as organized response campaigns.

### Organized Response Campaigns

Five or more responses, received separately but containing identical text, constitute an organized response campaign. Once an organized response campaign letter is identified, a “master” is entered into the database with all of the content information. All responses with matching text are then linked to this master within the database with a designated number. If a response does not contain all of the text presented in a given organized response, or if it includes additional text, it is entered as an individual letter. Identical responses from four or fewer respondents are also entered as individual letters.

Organized responses are identified with a number. The following table presents the total number received of each organized response campaign letter and summarizes the concerns found therein. Note: Some of the letters show less than five received; this is because a number of organized response campaign letters were submitted by government officials and their numbers are included in Table D-1 in Appendix D.

**Table E-1. Organized Response Campaigns**

Organized Response Campaign Letter Number	Total Received	Summary of Organized Response Campaign Letter
1	119	Supports the immediate implementation of a roadless area policy that applies to all roadless areas 1,000 acres and larger, and that restricts road construction, timber harvest, and other harmful activities in roadless areas.
2	39,482	Supports the Roadless Area Conservation Rule as it provides a balanced approach to forest conservation. Opposes forest-by-forest decisions on timber harvest and development in roadless areas and requests the inclusion of the Tongass National Forest.
3	1586	Expresses concern regarding past damages to roadless areas. Supports the Roadless Area Conservation Rule as it provides a balanced approach to forest conservation. Opposes forest-by-forest decisions on timber harvest and development in roadless areas and requests the inclusion of the Tongass National Forest.
4	7114	Suggests restricting timber harvest, mining, and drilling in roadless areas. Also suggests that oil and gas companies should not be given local influence in the management of roadless areas. Supports the Roadless Area Conservation Rule as it was adopted after sufficient public input. Also describes important values of

		roadless areas such as wildlife habitat and watershed protection.
5	4	Suggests that the Roadless Area Conservation Rule was the most important accomplishment of the Clinton Administration and that governmental restrictions are the only hope to protect natural beauty and balance. Also suggests that roadless areas are buffers against pollution and environmental damage. Expresses support for any agency or elected representative who protects and preserves natural lands.
6	114	Requests the full protection of grizzly bears and their habitat through the implementation of the Roadless Area Conservation Rule. Also requests that any process that leads to clearcutting or development of roadless areas be prohibited.
7	1067	Supports immediate implementation of the Roadless Area Conservation Rule as written. Suggests that all roadless areas be protected from timber harvest, roadbuilding, and mining and that the Rule include the Tongass and Chugach National Forests.
8	6597	Letter does not support the Roadless Area Conservation Rule, suggesting it was part of a flawed National Environmental Policy Act process. Requests the Rule be revised to adequately address forest health concerns, access to private and state inholdings, and local input. Also requests that roadless areas be accurately mapped at the forest level including an inventory of classified and unclassified roads. Modifications to the Rule must also take into consideration the need to access national forests to provide for congressionally mandated multiple uses. Includes responses to the ten questions which generally oppose the Rule.
9	13	Suggests that the Roadless Area Conservation Rule should be revised to address the issues of recreational access, forest health, access to private and state inholdings, and local input. Also suggests that modifications to the Rule must take into account the need to access national forests to provide for Congressionally-mandated multiple uses. Supports local forest-level decisionmaking. Provides responses to the ten questions which generally oppose the Rule.
10	6685	Supports the Roadless Area Conservation Rule and urges abandonment of efforts to weaken roadless area protections. Opposes forest-by-forest decisionmaking and suggests that the Rule already contains the exemptions necessary to protect forest health, communities, homes and property and access to inholdings.
11	817	Letter does not support the Roadless Area Conservation Rule, suggesting it was part of a flawed National Environmental Policy Act process. Requests the Rule be revised to adequately address forest health concerns, access to private and state inholdings, and local input. Also requests that roadless areas be accurately mapped at the forest level including an inventory of classified and unclassified roads. Modifications to the Rule must also take into consideration the need to access national forests to provide for congressionally mandated multiple uses. Other suggestions include the need to use up-to-date criteria for delineation of roadless areas, deletion of roaded portions of inventoried roadless areas from the inventory, evaluation of economic and social relationships impacting working families and local communities, and inclusion of a full range of management alternatives. Suggests that wilderness recommendations and local forest level decision making should also be addressed.
12	167	Provides responses to the ten questions. Responses suggest that forest plans must

		provide for multiple use and protect forest resources from fire and insects through local planning. Also suggests that public hearings be held to involve all parties in the process, that the protection of communities should be the primary factor in determining the way a fire is fought, and that roadless areas should be managed no differently than any other area of the forest.
13	7210	Letter does not support the Roadless Area Conservation Rule as it was the product of a flawed National Environmental Policy Act process. Suggests the Rule be revised to adequately address forest health concerns, access to private and state inholdings, and local input. Also requests that roadless areas be accurately mapped at the forest level including an inventory of classified and unclassified roads. Modifications to the Rule must also take into consideration the need to access national forests to provide for congressionally mandated multiple uses. Other suggestions include the need to use up-to-date criteria for delineation of roadless areas, deletion of roaded portions of inventoried roadless areas from the inventory, and evaluation of economic and social relationships impacting working families and local communities. Requests a process to allow those most affected by management decisions on public lands to be heard.
14	2532	Supports the Theodore Roosevelt Conservation Alliance's "Square Deal Initiative #1." Suggests that the 58 million acres under consideration should be kept roadless and that criteria should be carefully defined for the consideration of any exceptions for providing road access for forest management. Also suggests that decisionmaking should include the interests of local people while the final decision authority to build roads in roadless areas should be retained by the Chief of the Forest Service.
15	2230	Expresses disappointment and distrust toward the Bush Administration's attempt to weaken forest protections and ignore public input. Requests the immediate implementation of the Roadless Area Conservation Rule.
16	485	Supports the Roadless Area Conservation Rule and all efforts to oppose the weakening of forest protections. Suggests that roadless areas are valuable for high quality fish and wildlife habitat, backcountry recreation, and clean water supplies.
17	4	Opposes the Gravina Island timber sale as it is in violation of the Roadless Area Conservation Rule. Suggests that this timber sale will harm the wilderness character and pose a threat to the historical, cultural, and recreational values of the area. Also suggests that significant damage to the native historical uses and cultural resources will result from this timber harvest as well as damage to fish and wildlife habitat.
18	32,728	Expresses disappointment and distrust toward the Bush Administration's attempt to weaken forest protections and ignore public input. Requests the immediate implementation of the Roadless Area Conservation Rule.
19	184	Supports the Roadless Area Conservation Rule and urges abandonment of efforts to weaken roadless area protections. Opposes forest-by-forest decisionmaking and suggests that the Rule already contains the exemptions necessary to protect forest health, communities, homes and property, and access to inholdings. Also suggests that previous public involvement processes have proven public support for roadless area protections.
20	129	Supports the Roadless Area Conservation Rule to protect all roadless areas, including the Tongass and Chugach National Forests. Suggests that roadless areas

		are vulnerable to development and should be protected for future generations and clean drinking water.
21	522	Provides responses to the ten questions. Responses suggest that the management of roadless areas should be determined in forest plans on a site-specific basis, that effective communication is conducted at the forest level, and that road access is necessary for forest health management and private inholdings. Provides an extensive list of factors that should be considered in the evaluation of roadless areas. Suggests that a full range of alternatives should be considered for the management of roadless areas.
22	36	Requests that the flaws in the Roadless Area Conservation Rule be fixed to address forest health, public access, local input, the mapping and classification of roads, and congressionally mandated multiple uses. Suggests that concern for each forest requires active local management.
23	730	Supports the continuance and protection of dispersed recreation opportunities in roadless areas. Provides responses to some of the ten questions that have a direct impact on recreation and offers suggestions regarding appropriate management of motorized recreation.
24	73	Opposes the Roadless Area Conservation Rule as it is excessively restrictive regarding access to lands for recreational use. Supports the court ruling that the Rule was predetermined and violated the National Environmental Policy Act. Requests that the Rule be withdrawn.
25	4	Opposes the Roadless Area Conservation Rule as it is illegal, politically driven, and ignores legitimate access concerns. Suggests that protection of access to public lands should be done through a program of thinning and timber harvest management. Also suggests that environmental protection should take into account the realities about multiple use and recreational opportunities and that roadless area decisions should occur at the local level.
26	26	Supports the Roadless Area Conservation Rule as it strikes a balance between preserving wildlands and accommodating competing uses. Expresses specific concerns about roadless areas in the Los Padres and Six Rivers National Forest. Opposes forest-by-forest decisionmaking regarding roadless area management.
27	41,413	Opposes any changes to the Roadless Area Conservation Rule that would allow timber harvest in pristine areas of any national forest, especially the Tongass National Forest. Also opposes forest-by-forest decisionmaking for roadless area management. Suggests that the Tongass is valuable for abundant wildlife and should be protected. Also suggests that previous public support for the Rule should not be ignored.
28	1722	Supports the Roadless Area Conservation Rule as it strikes a balance between preserving wildlands and accommodating competing uses. Opposes forest-by-forest decisionmaking regarding roadless area management. Suggests that most national forests are already open to development and that the last remaining wildlands should be preserved.
29	129	Suggests that all roadless areas should be managed to prohibit timber harvest and roadbuilding. Requests implementation of the Roadless Area Conservation Rule.
30	9	Suggests that the Roadless Area Conservation Rule enjoys overwhelming public

		support and should be implemented because local planning has failed to adequately protect roadless areas. Describes the value of roadless areas to be sources of clean drinking water, wildlife habitat, areas for scientific research and study, and to provide open space and areas for cultural observances. Also suggests that the Rule received adequate public support, already provides exceptions for forest health management, has no affect on access to inholdings, and should be retained and implemented as is. Includes a list of specific areas in Texas to be included in the roadless area inventory.
31	105,980	Supports the Roadless Area Conservation Rule as it protects roadless areas in the national forests, especially the Tongass National Forest. Opposes any changes that would weaken the January Rule including forest-by-forest decision-making.
32	275	Supports the Roadless Area Conservation Rule as it strikes a balance between preserving wildlands and accommodating competing uses. Opposes forest-by-forest decisionmaking regarding roadless area management. Also suggests that previous public support for the Rule should not be ignored, and the Rule should be implemented to preserve roadless areas for future generations.
33	18	Requests that roadless areas be closed to timber harvest, mining, road building, and drilling and that previous public comment on the Roadless Area Conservation Rule be included in this analysis. Suggests that roadless areas should be kept roadless because wildfires are more likely to start in areas with roads, because roadless area conservation is important to the diversification of rural economies, and because roadless areas provide clean water and wildlife habitat.
34	5	Supports the Roadless Area Conservation Rule as it received much public support. Suggests that we need to preserve forest areas rather than mine and harvest them.
35	300	Supports the Roadless Area Conservation Rule, as roadless areas are critical fish and wildlife habitat. Suggests that fishing and hunting values should be considered in decisions regarding roadless area management. Also suggests that economic values of roadless areas should be considered because fishing contributes to the nation's economy. Requests that roadbuilding should be prohibited in roadless areas because roads threaten vital fish habitat by increasing sediment in streams.
36	404	Supports the Roadless Area Conservation Rule and its immediate implementation on all national forests. Suggests that adequate public support for the Rule has already been exhibited and all interested parties had the opportunity to address their concerns about roadless values. Also suggests that the Rule provides for the protection of forest values while adequately addressing local forest managers' communities' needs and competing interests.
37	28	Suggests that only a national rule can adequately protect roadless areas. Also suggests that the Roadless Area Conservation Rule allows forest health management, ensures access to inholdings, and considers the economic benefit of revenue from recreational activities.
38	1	Supports the Roadless Area Conservation Rule. Suggests that the Rule is a compromise between protection and industrial development and provides a balance between recreational and extractive uses. Suggests that the White Mountain National Forest provides solitude and recreational value for its residents as well as visitors and that the Rule helps protect biological, economic, and private property resources.

39	7	Supports the Roadless Area Conservation Rule. Suggests that protecting roadless areas is important for outdoor experiences. Also suggests that local forest planning has failed to provide adequate protection and that the Rule has overwhelming public support.
40	7	Supports the Theodore Roosevelt Conservation Alliance's Square Deal Initiatives. Suggests balancing accessibility to National Forest System lands with management requirements. Also suggests increasing funding and accountability for fish and wildlife habitat management programs at all levels.
41	149	Requests implementation of the Roadless Area Conservation Rule and supports permanent protection for roadless areas in the Plumas National Forest. Suggests that roadless areas provide clean drinking water, recreational opportunities, and critical wildlife habitat.
42	120	Provides responses to the ten questions. Responses suggest that decisions be made at the local level with adequate public involvement, that fire breaks, thinning and fuel reduction should be performed, and that access needs should be met. Also suggests that natural resources should not be wasted, that recreation should be accommodated, that Congress should designate roadless areas, and that the Forest Service should recognize the increasing demand for roads.
43	1420	Suggests that the recreational community was not given adequate opportunity to comment on the Roadless Area Conservation Rule. Requests that local communities have the opportunity to have their view incorporated into management plans and that national forests remain open to responsible recreational activities.
44	29	Supports the Roadless Area Conservation Rule and provides responses to the ten questions. Responses suggest that local forest planning has not adequately protected roadless areas and that the Rule is needed to provide additional protection. Also suggests that the Rule received adequate public support, already provides exceptions for forest health management, has no affect on access to inholdings, and should be retained and implemented as is.
45	6	Supports the Roadless Area Conservation Rule as a national Rule is essential to safeguarding roadless areas. Opposes local control by timber, mining, and extraction interests.
46	24	Requests implementation of the Roadless Area Conservation Rule. Suggests that the role of local forest planning is to add additional restrictions to the Rule based on local situations. Also suggests that the Rule sufficiently addresses forest health management, public involvement, roadless area values, and economic considerations. Requests that off-road vehicles and mining should be prohibited.
47	19	Supports the Roadless Area Conservation Rule as it stands for ensuring wilderness and wild rivers. Also supports permanent protection of the Chugach and Tongass National Forests. Suggests that these forests are valuable for economic resources, healthy fisheries, clean water, wildlife, cultural heritage, and recreational opportunities.
48	7	Expresses concern that the Roadless Area Conservation Rule was rushed through and public meetings were not adequately announced. Suggests that roadless area decisions should be made on a forest-by-forest basis within the forest planning process. Also suggests that there is a forest health crisis in Idaho that must be

		addressed through proper forest management. Provides responses to the ten questions which generally support local forest management and active forest health management.
49	228	Supports the Roadless Area Conservation Rule as roadless areas are important for recreational experiences and ecosystem protection. Suggests that the Rule is the result of extensive participation and adequately addresses issues of fire management, forest health, access, and local input.
50	3021	Supports the scientific management of fish and wildlife habitat that will remain open to hunters and anglers. Requests that existing roads be fixed while roadless areas remain roadless.
51	835	Requests that roadbuilding be restricted in 58.5 million acres, that fish and wildlife be a priority in habitat management, and that decisions be made on science rather than politics. Suggests that all comments should be given equal weight.
52	75	Supports the Roadless Area Conservation Rule as it is the product of an extensive federal rulemaking with overwhelming public support. Suggests that the Rule represents a balanced approach to forest conservation and adequately addresses the issues of fire management, forest health, access, and local input. Opposes forest-by-forest decisionmaking on roadless area development.
53	6	Supports the Roadless Area Conservation Rule because Montanans have voiced strong support for permanent roadless area protection.
54	24	Letter does not support the Roadless Area Conservation Rule, suggesting it was part of a flawed National Environmental Policy Act process. Requests the Rule be revised to adequately address recreational access, forest health concerns, access to private and state inholdings, and local input. Also requests that roadless areas be accurately mapped at the forest level including an inventory of classified and unclassified roads. Modifications to the Rule must also take into consideration the need to access national forests to provide for congressionally mandated multiple uses. Other suggestions include the need to use up-to-date criteria for delineation of roadless areas, deletion of roaded portions of inventoried roadless areas from the inventory, and inclusion of a full range of management alternatives. Suggests that wilderness recommendations and local forest level decisionmaking should also be addressed.
55	9	Supports the Roadless Area Conservation Rule because forests and wildlife are precious and should be protected. Suggests that roadless area protection reflects the desires of the citizens of Oregon.
56	1	Supports the Roadless Area Conservation Rule as it provides a balanced approach to forest conservation. Suggests that the previous public involvement process should ensure decision makers of public support for the Rule. Opposes forest-by-forest decisions on timber harvest and development in roadless areas.
57	215	Supports the Roadless Area Conservation Rule because it would protect areas in the White River National Forest. Suggests that the Rule is a sound compromise between protection and development. Opposes forest-by-forest decisions on roadless area development.
58	3245	Supports the Roadless Area Conservation Rule because individual forest planning

		has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
59	5120	Supports the Roadless Area Conservation Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
60	3466	Supports the Roadless Area Conservation Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
61	2544	Supports the Roadless Area Conservation Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
62	7	Supports the Roadless Area Conservation Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
63	339	Supports the Roadless Area Conservation Rule without proposed amendments as it is a balanced approach to forest conservation and adequately addresses issues of

		fire management, forest health, access, and local input.
64	10	Opposes roadless area designation. Suggests that roadless areas endanger forest health because timber cannot be adequately managed or protected. Also suggests that the forest is for the use and enjoyment of all people, not for a select few.
65	399	Letter does not support the Roadless Area Conservation Rule, suggesting it was part of a flawed National Environmental Policy Act process. Requests the Rule be revised to adequately address forest health concerns, access to private and state inholdings, and local input. Also requests that roadless areas be accurately mapped at the forest level including an inventory of classified and unclassified roads. Modifications to the Rule must also take into consideration the need to access national forests to provide for congressionally mandated multiple uses. Suggests that modifications adequately address the forest health crisis threatening our national forests and supports individual forest plan decisions for management of roadless areas. Includes responses to the ten questions which reflect the above information.
66	24,261	Supports the Roadless Area Conservation Rule. Expresses distrust toward the Bush Administration for refusal to implement the Rule.
67	787	Suggests that roads be kept out of roadless areas and that roadless areas should be managed for fish and wildlife habitat. Also suggests that roadless areas be open to hunting and fishing and that existing forest roads be maintained.
68	1580	Requests immediate implementation of the Roadless Area Conservation Rule, including protection of the Tongass National Forest. Opposes forest-by-forest decisions on timber harvest and development. Suggests that roadless areas should be protected from road building and commercial extraction.
69	13	Requests immediate implementation of the Roadless Area Conservation Rule, including the protections for the Tongass National Forest. Suggests that roadless areas are valuable for drinking water, ecosystem protection, scientific study, and biodiversity. Also suggests that the economic value of roadless areas comes from recreation and environmental quality of life.
70	51	Opposes the Roadless Area Conservation Rule as it was imposed without going through proper channels of local public input. Suggests that road closures put undue hardship on local economies and eliminates currently available motorized recreation uses.
71	25	Supports the Roadless Area Conservation Rule because one million people voiced support for the Rule. Suggests that roadless areas have the highest quality fish and wildlife habitat, backcountry recreation, and clean water supplies. Also suggests that many areas not included in the Rule should be included and all off-road vehicle use in roadless areas should be prohibited.
72	8	Supports the Roadless Area Conservation Rule because roadless areas have the highest quality fish and wildlife habitat, backcountry recreation, and clean water supplies. Opposes forest-by-forest decisions on roadless area development. Letter provides opportunity to respond to the ten questions.
73	0	Supports the Roadless Area Conservation Rule as it protects roadless areas in our national forests, especially the Tongass National Forest. Opposes any changes that would weaken the January Rule including forest-by-forest decision-making.

74	462	Supports the Roadless Area Conservation Rule.
75	10	Suggests that the Roadless Area Conservation Rule was based on a process that was poorly and hastily executed. Also suggests that the Rule should be fixed by allowing for greater local input, by providing an assessment of the long-term impact of withdrawing lands from the resources base, and by compliance with congressionally mandated multiple uses of the forests. Supports individual forest plan level decisions for roadless area management. Provides responses to the ten questions which generally reflect the above concerns.
76	4	Supports the Roadless Area Conservation Rule because one million people voiced support for the Rule. Suggests that roadless areas have the highest quality fish and wildlife habitat, backcountry recreation, and clean water supplies. Also suggests that many areas not included in the Rule should be included and all off-road vehicle use in roadless areas should be prohibited.
77	3	Provides responses to the ten questions. Responses suggest that local managers should manage roadless areas, that local people should control forest decisions, that forest management access should be maintained, and that social and economic considerations should play a large role in roadless area evaluations. Also suggests that ski areas should be allowed in roadless areas, that roadless areas should not be proposed for wilderness designation, and that great emphasis should be placed on local impacts.
78	164	Provides responses to the ten questions. Responses suggest that the role of local forest planning is to enforce the Roadless Area Conservation Rule. Also suggests that the Rule received adequate public support, has no effect on fire management, access to inholdings, or wilderness considerations, and has adequately identified roadless area values. Requests that roadbuilding, timber harvest, drilling, mining, and off-road vehicles be prohibited in roadless areas. Also requests that the Forest Service should stop preparing timber sales in the Tongass National Forest and stop undermining the legality of the Rule.
79	174,220	Supports the Roadless Area Conservation Rule as it protects pristine areas and is a compromise between protection and development. Opposes forest-by-forest decisions on timber harvest and development in roadless areas.
80	99	Supports the Roadless Area Conservation Rule as it is the result of an extensive public involvement process. Suggests that roadless areas are a great treasure and should be preserved for future generations.
81	1057	Supports the Roadless Area Conservation Rule as it is ecologically necessary and immensely popular. Suggests that the ten questions are biased and may undermine a fair comment process. Also suggests that the Rule adequately addresses issues of fire management, forest health, access, and local input.
82	324	Letter does not support the Roadless Area Conservation Rule, suggesting it was part of a flawed National Environmental Policy Act process. Requests the Rule be revised to adequately address forest health concerns, access to private and state inholdings, and local input. Also requests that roadless areas be accurately mapped at the forest level including an inventory of classified and unclassified roads. Modifications to the Rule must also take into consideration the need to access national forests to provide for congressionally mandated multiple uses. Other suggestions include the need to use up-to-date criteria for delineation of

		roadless areas, deletion of roaded portions of inventoried roadless areas from the inventory, evaluation of economic and social relationships impacting working families and local communities, and inclusion of a full range of management alternatives. Suggests that wilderness recommendations and local forest level decisionmaking should also be addressed.
83	98	Suggests that roadless areas provide clean water, high quality fish and wildlife habitat and should be protected by implementation of the Roadless Area Conservation Rule. Opposes forest-by-forest decisions on roadless area management.
84	25	Letter contains no text.
85	866	Supports the Roadless Area Conservation Rule because National Forests deserve protection from destructive activities. Suggests that roadless areas are valuable for high quality fish and wildlife habitat, backcountry recreation, and clean water supplies.
86	31	Opposes the Roadless Area Conservation Rule. Suggests that road access should be maintained to control and prevent fire and that controlled burns to improve forest health are good. Also requests that National Forests provide wildlife habitat, recreation, and watershed management.
87	74	Suggests that management decisions should be made in the forest plans. Expresses concerns regarding the lack of data to support the assertion that existing roads are having significant negative effects on the environment and the lack of consideration of alternatives to minimize road maintenance. Suggests that the quantity of water delivered at the forest boundary should be increased by silvicultural practices.
88	96	Suggests that the recreational community was not given adequate opportunity to comment on the roadless issue. Supports developing specific management plans for each national forest that allow local needs to be met. Also suggests the importance of motorized access to National Forest System lands.
89	6	Opposes the Roadless Area Conservation Rule because it will devastate forest health, cripple rural communities, and lead to future undue lawmaking regarding access to inholdings. Suggests that the Rule should be revised to address forest health, permit access, and allow for local input. Also suggests that forest management decisions should be made at the local level.
90	994	Suggests that roadless areas provide clean water, high quality fish and wildlife habitat and should be protected by implementation of the Roadless Area Conservation Rule. Opposes forest-by-forest decisions on roadless area management.
91	14,965	Supports the Roadless Area Conservation Rule as it protects pristine areas while still allowing access for forest health management. Opposes forest-by-forest decisions on timber harvest and development in roadless areas.
92	153	Requests implementation of the Roadless Area Conservation Rule and that the Camp Hutchins area be included as a roadless area. Suggests that the role of local forest planning is to add additional restrictions to the Rule based on local situations. Also suggests that the Rule sufficiently addresses forest health management, public involvement, roadless area values, and economic

		considerations. Requests that off-road vehicles and mining should be prohibited.
93	20	Supports the Roadless Area Conservation Rule as it is the product of an extensive federal Rulemaking with overwhelming public support. Suggests that the Rule represents a balanced approach to forest conservation and adequately addresses the issues of fire management, forest health, access, and local input. Requests the inclusion of the Tongass National Forest.
94	27	Supports protecting roadless areas in the Green Mountain and White Mountain National Forests and opposes weakening of the Roadless Area Conservation Rule. Suggests that roadless areas should be protected from roadbuilding, mining, and timber harvest.
95	245	Supports repealing all prohibitions regarding roadless areas because local economies would be damaged by not allowing timber harvest companies to harvest dead wood. Also expresses concern regarding limited ability to manage for forest health due to restricted road access to roadless areas. Suggests that more local control is needed, that Congress should designate roadless areas, and that competing interests should be resolved by considering who the decision affects the most.
96	7	Supports the Roadless Area Conservation Rule as it protects 60 million acres from commercial extraction industries. Suggests that these industries do not own National Forest System lands and that citizens have spoken in support of protecting roadless areas. Also suggests that the Rule represents a balanced approach to forest conservation and adequately addresses forest issues.
97	155	Provides responses to the ten questions. Responses suggest that roadless area Rulemaking should be postponed until the Planning Rule changes are finalized, that each roadless area should be managed individually to preserve the exact composition of each area, and that decisions must be made to minimize the risk of wildfire, insects, and disease. Also suggests that the Forest Service should avoid acquiring more property within roadless areas. The Forest Service should consider the nation's needs for lumber, motorized and non-motorized recreational opportunities, size and character of a roadless area, historic use, economic impacts, and overall health of the area when evaluating roadless areas. Suggests that decisions regarding allowable activities should be made on a case-by-case basis, and that sound science should prevail when working with competing interests.
98	11	Letter does not support the Roadless Area Conservation Rule, suggesting it was part of a flawed National Environmental Policy Act process. Requests the Rule be revised to adequately address forest health concerns, access to private and state inholdings, and local input. Also requests that roadless areas be accurately mapped at the forest level including an inventory of classified and unclassified roads. Modifications to the Rule must also take into consideration the need to access national forests to provide for congressionally mandated multiple uses. Supports individual forest plan decisions for roadless area management.
99	20	Suggests that the Roadless Area Conservation Rule was developed with adequate public input and review and that it received overwhelming public support. Also suggests that local planning processes have failed to adequately protect roadless areas. The Rule adequately addresses issues regarding local involvement, access to inholdings, forest management, fire management, and recreational opportunities. Requests that roadbuilding, timber harvest, mining, off-road vehicle

		use and commercial extraction be prohibited in all roadless areas 1,000 acres and larger.
100	12	Expresses concern that the primary impacts of the Roadless Area Conservation Rule are a loss of local forest planning ability and a corresponding loss of consideration of local needs and concerns. Provides responses to the ten questions. Responses suggest that the local forest planning process should continue to decide roadless area management, that local plans should contain provisions for addressing natural events, that reasonable access to inholdings should be provided, and that a full range of factors should be considered in evaluating roadless areas. Requests that any review of roadless policy should be coordinated with reviews of forest planning regulations and the forest transportation policy.
101	5	Supports the Roadless Area Conservation Rule, including protection for the Tongass National Forest, as it adequately addresses fire management, forest health, access, and local input. Opposes forest-by-forest decisions on development in roadless areas.
102	8	Supports the Roadless Area Conservation Rule and urges the prohibition of all development projects in roadless areas. Suggests that local management is insufficient to protect wilderness characteristics of national forests.
103	37	Supports the Roadless Area Conservation Rule and opposes forest-by-forest decisions on timber harvest and development in roadless areas. Provides responses to the ten questions. Responses suggest that local forest planning has failed to protect roadless areas, that the Rule was developed with adequate public involvement, and that the Rule provides exceptions that allow forest health management. Suggests that property owners should be educated about fire proofing their property, that roadbuilding, mining, timber harvest, and off-road vehicle use be prohibited in roadless areas, and requests the immediate implementation of the Rule to abide by the will of the public.
104	5	Requests implementation of a strong roadless area policy that would permanently halt roadbuilding, timber sales, mining, and oil and gas development in roadless areas 1,000 acres or larger.
105	522	Opposes the Roadless Area Conservation Rule because it is a thinly disguised effort to reduce the multiple use of forests. Suggests that roads are necessary for forest health management access as well as access to harvest raw materials. Expresses concern regarding the ability to fight fires in roadless areas.
106	420	Supports the Roadless Area Conservation Rule as it offers a balanced approach to forest conservation without compromising public health and safety or access to inholdings. Opposes forest-by-forest decisions on roadless area management.
107	28	Suggests that the Roadless Area Conservation Rule is the result of a misguided attempt to produce a healthier forest. Requests that the Rule be revised to address the forest health crisis, the need to access forests for multiple use, and to support individual forest plan decisions. Suggests that the decisionmaking process should include people directly affected by the decision.
108	12	Supports the Roadless Area Conservation Rule and expresses concern regarding the Bush Administration's attempt to thwart preservation of wildlands. Requests that trapping activities be prohibited within roadless areas because leghold traps are precarious and inhumane. Suggests that additional road development will

		encroach upon wildlife habitat.
109	5988	Supports the Roadless Area Conservation Rule, including protection for the Tongass National Forest, as it adequately addresses fire management, forest health, access, and local input. Opposes forest-by-forest decisions on development in roadless areas.
110	4163	Supports the Roadless Area Conservation Rule and its immediate implementation and inclusion of the Tongass National Forest. Suggests that the public rejects changes to the Rule.
111	629	Supports the Roadless Area Conservation Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that local forest planning has failed to adequately protect roadless areas and that the Rule was developed through an extensive public involvement process. Also suggests that the Rule already provides exceptions for forest health management, that forest fires should be left to burn in most cases, and that access to private property is already ensured in the Rule. Letter provides a list of environmental, social, and cultural values associated with roadless areas and requests that timber harvest, mining, oil drilling, off-road vehicle use, and pack animals should be banned. Suggests that the ten questions are highly biased and unnecessary because the public has already spoken in support of the Rule.
112	236	Supports the Theodore Roosevelt Conservation Alliance's "Square Deal Initiative #1." Suggests that the 58 million acres under consideration should be kept roadless and that criteria should be carefully defined for the consideration of exceptions for providing road access for forest management. Also suggests that decisionmaking should include the interests of local people while the final decision authority to build roads in roadless areas should be retained by the Chief of the Forest Service.
113	115	Expresses belief that the remaining roadless areas should be spared from the consumption of exhaustible resources because they are critical for drinking water, air quality, spaces of unspoiled beauty, and recreational opportunities. Suggests that ecosystems should be allowed to exist for their intrinsic value. Supports the Roadless Area Conservation Rule and opposes forest-by-forest decisions on roadless area management.
114	13	Requests protection of all National Forest Inventoried Roadless Areas through a national policy that prohibits road construction and timber harvest in these areas, specifically in the Colville and Umatilla National Forests.
115	20	Opposes the Roadless Area Conservation Rule because it will restrict multiple use and have a negative effect on rural economies. Expresses concern that fuel loading and fire risk as well as forest health are not adequately addressed by the Rule. Suggests that the roadless plan be managed through the local forest planning process with emphasis on protecting the local economy. Emphasizes the need to solicit and include local input in decisionmaking and apply a system that gives higher priority to those that are most impacted by the decisions. Suggests that public resources should be protected from insect, disease and wildfire that affect adjacent communities, homes, businesses, and property. Also includes concerns regarding firewood permits and dead tree removal, access to property, use of tax dollars for road and trail closure, and the designation of roadless areas as wilderness.

116	12	Supports the Roadless Area Conservation Rule because it adequately addresses issues of fire management, forest health, access, and local input. Opposes forest-by-forest decisionmaking as well as road building, timber harvest, and other development in roadless areas as they provide critical sources of clean water, healthy fisheries, and wildlife habitat. Suggests that the backlog of road maintenance should justify the implementation of the Rule. Also suggests that roadless areas are a source of employment and income for thousands of local businesses in the Northern Rockies.
117	541	Mentions that 95 percent of Americans support the Roadless Area Conservation Rule. Requests that actions be taken to ensure that the Rule is not undermined and that the Forest Service listen to the will of the American people. Requests that the Rule be implemented immediately and without exemption.
118	298	Requests that the Forest Service fix the Roadless Area Conservation Rule as it is the product of a flawed NEPA process, and is contrary to the agency's legal authority. Suggests that the process also ignored substantial concerns raised by local, state, and federal elected officials. Requests that the Rule be revised to adequately address forest health concerns, access to private and state inholdings, local input, and that roadless areas be accurately mapped at the forest level. Supports forest management at the local level as well as individual forest plan decisions for management of roadless areas. Requests that a process be put into place that allows those who are most affected by management decisions on public lands to be included and heard. Includes a listing of the ten questions with no responses.
119	208	Opposes the Roadless Area Conservation Rule because it will threaten the harvesting of diseased trees to be used for commercial purposes. Expresses concern that the Rule will cause a loss of jobs as well as keep people out of the housing market due to soaring lumber prices. Suggests that harvesting dead and dying timber helps prevent forest fires, and provides space for new tree growth. Also suggests that the Roadless Area Conservation Rule will prevent recreational use by the elderly and handicapped citizens as well as take land away from Americans.
120	134	An action alert sent out by the Sierra Club which encourages people to send in comments requesting that the Forest Service keep the Roadless Area Conservation Rule intact.
121	8	Opposes the Roadless Area Conservation Rule suggesting that locking up vast areas in a roadless condition causes them to die from fires and/or diseases. Requests that forests be managed for multiple use by professionals.
122	7	Supports the Roadless Area Conservation Rule, including protection for the Tongass National Forest, as it provides a balanced approach to forest conservation. Suggests that roadless areas are healthier than roaded forests and are less prone to devastating wildfires and insect damage.
123	7	Supports the Roadless Area Conservation Rule including protection for the Tongass National Forest. Opposes forest-by-forest decisions on timber harvest, road building, and other developments. Suggests that people residing near national forests should have no more influence on forest plans than other citizens living far from forests.
124	6	Requests immediate implementation of the Roadless Area Conservation Rule

		including protection for the Tongass National Forest. Requests protection in order to preserve drinking water, provide family activities, and protect fish and wildlife habitat. Suggests that the Rule already contains provisions to address wildfires and forest health. Supports national guidelines for roadless areas and opposes modifying the Rule to allow forest-by-forest decisionmaking on timber harvest, roadbuilding, or development in pristine areas.
125	6	Supports the Roadless Area Conservation Rule as it protects millions of acres of roadless forest from road construction, timber harvest, and mining. Suggests the need for the United States to set an example to other countries regarding conservation of wild areas. Also suggests the importance of maintaining areas of untouched wilderness.
126	25	Same as form 118 and includes responses to the ten questions. Responses generally oppose the Roadless Area Conservation Rule.
127	3515	Supports the Roadless Area Conservation Rule as it protects forests from timber harvest, mining, and drilling activities already allowed on most National Forest System lands. Makes reference to the extensive public support and involvement for the Rule. Suggests that the Rule adequately addresses issues of fire management, forest health, and access, and gives local decision makers the necessary flexibility for sound forest management. Requests inclusion of protection for the Tongass National Forest and asserts that letting the Rule stand is the best way to protect roadless values.
128	4	Supports the Roadless Area Conservation Rule. Requests protection of the last of America's wild national forests from timber harvest, road building, and mining.
129	6	Supports the Roadless Area Conservation Rule and makes reference to the extensive public support and involvement regarding the Rule. Lists a number of negative environmental impacts that have taken place over the last 150 years. Suggests that the Rule adequately addresses issues of fire management, forest health, and access, and gives local decision makers the necessary flexibility for sound forest management. Requests inclusion of protection for the Tongass National Forest and suggests that letting the Rule stand is the best way to protect roadless values.
130	12	Supports the Roadless Area Conservation Rule and requests that all development projects be immediately halted that are inconsistent with the Rule. Expresses concern about the negative environmental impacts that timber harvest projects will have in national forests. Opposed to forest-by-forest decisionmaking on roadless area management as it has resulted in thousands of miles of roads and an \$8.5 million dollar maintenance backlog at cost to the taxpayer. Includes responses to the ten questions. Responses express opposition to local forest planning, satisfaction with the extensive public involvement process used to develop the Rule, and opposition to road building to prevent wildfire. Responses also assert that the Rule will have no effect on access to property, note the economic value of recreation and environmental quality of life, oppose exceptions for destructive activities, support the wilderness recommendation process, provide suggestions for how to move towards forest restoration while providing economic benefits, suggest that timber sales be halted in the Tongass National Forest as they are a violation of the Roadless Area Conservation Rule, and finally, request that a vigorous defense be set up against the lawsuits challenging the Rule.
131	17	Supports the Roadless Area Conservation Rule and opposes forest-by-forest

		decisionmaking for the management of roadless areas.
132	6	Supports the Roadless Area Conservation Rule and opposes forest-by-forest decisionmaking for the management of roadless areas.
133	4	Opposes any changes to the Roadless Area Conservation Rule that would allow timber harvest in forests protected by the Rule, especially the Tongass National Forest. Also opposes allowing individual forests to opt out of the Rule and allowing timber harvest, road building, and other development of these pristine areas. Requests that the Rule be implemented immediately and defended against industry and other lawsuits to preserve the Tongass National Forest and other forests for future generations.
134	230	Supports the Roadless Area Conservation Rule as it protects 4.4 million acres in Colorado. Mentions the overwhelming number of comments, 28,000 of them from Coloradoans. Suggests that the Rule adequately addresses fire management, forest health, access, and local input. Opposes the weakening of national forest protection through forest-by-forest decisionmaking and requests the protection of roadless areas from road construction, timber harvest, and drilling.
135	959	Opposes the Roadless Area Conservation Rule, as it will negatively impact public access to forest lands. Supports access to recreational roads and trails, as they provide opportunities for families to spend time together. Expresses concern that road closures will be detrimental to the economic well being of the nation. Disappointed that the Rule will limit use of our national forests by older and disabled Americans. Opposes closing more land on the Ottawa National Forest as proposed in the 1986 Forest Plan. Also suggests that diverse recreational opportunities are important to rural economies.
136	136	Requests that the Forest Service fix the Roadless Area Conservation Rule as it is the product of a flawed NEPA process, and is contrary to the agency's legal authority. Suggests that the process also ignored substantial concerns raised by local, state, and federal elected officials. Requests that the Rule be revised to adequately address forest health concerns, access to private and state inholdings, local input, and that roadless areas be accurately mapped at the forest level. Supports forest management at the local level as well as individual forest plan decisions for management of roadless areas. Also requests that the Forest Service provide access to private and state lands. Suggests that the Forest Service provide up to date criteria for the delineation of roadless areas, as well as remove roaded portions of inventoried roadless areas from the inventory. Also suggests that economic and social relationships be evaluated, including those that directly impact working families and local communities. Requests a process be put into place that allows those who are most affected by management decisions on public lands to be included and heard.
137	1209	Requests protection of all national forest roadless areas through a national policy to prohibit road construction and timber harvest.
138	10	An action alert that requests input regarding a list of questions. Responses to the questions are included in the alert. Some of the responses include concerns regarding the need for decisions to be made at the local level, establishing "fire breaks" to contain fires, fuel reduction through thinning, contacting stakeholders to ensure that needs are met, providing access, and providing multiple use. Supports more roads as well as systematic timber harvest.

139	29	Opposes the Roadless Area Conservation Rule, as it is the product of a flawed NEPA process, conducted without accurate information about roadless areas. Requests revision of the Rule to address recreation access, forest health, access to private and state inholdings, local input, and accurate mapping of roadless areas at the forest level. Supports forest management the local level as well as a “Backcountry” land use designation that offers motorized and non-motorized recreation choices together with resource protection and management for forest health. Also includes responses to the ten questions that mainly focus on the need for local control for forest planning.
140	5	Requests that the Forest Service fix the Roadless Area Conservation Rule as it is the product of a flawed NEPA process, and is contrary to the agency’s legal authority. Suggests that the process also ignored substantial concerns raised by local, state, and federal elected officials. Requests that the Rule be revised to adequately address forest health concerns, access to private and state inholdings, local input, and accurate mapping of roadless areas at the forest level. Supports forest management at the local level as well as individual forest plan decisions for the management of roadless areas. Also requests that the Forest Service provide access to private and state lands. Suggests that the Forest Service provide up to date criteria for the delineation of roadless areas, as well as remove roaded portions of inventoried roadless areas from the inventory. Also suggests that economic and social relationships be evaluated, including those that directly impact working families and local communities. Requests a process be put into place that allows those who are most affected by management decisions on public lands to be included and heard.
141	4	Requests that the Forest Service scientifically manage all fish and wildlife habitat in the National Forest System as lands that will remain open to hunters, anglers, and other public users. Expresses concern about the need for accessibility and comments on the need to keep roadless areas unroaded. Supports science-based exceptions in the Rule for local and regional forest health as well as forest restoration. Suggests that roadless areas be kept roadless, that public process should decide how areas should be used, that criteria should be carefully defined for consideration of any exception regarding roads and forest management, and that the interests of local people should be included in decisionmaking.
142	25	Supports the Roadless Area Conservation Rule, as it is the product of the most extensive federal rulemaking in history. Comments on the quality recreational opportunities provided by roadless lands in Colorado. Suggests that the Rule provides a balanced approach to forest conservation as well as addresses issues of fire management, forest health, access, and local input. Opposes forest-by-forest decisionmaking as it weakens forest protection. Supports preservation of roadless areas for recreational experiences.
143	1281	Requests that roadless areas in the Shoshone National Forest be considered for wilderness designation. Suggests that the Forest Service should protect all roadless areas for recreation and wildlife, and restrict oil and gas development, taxpayer subsidized timber harvest, and increased off-road vehicle use.
144	7	Generally supports the Roadless Area Conservation Rule with a few exceptions. Expresses disappointment that the Rule does not prohibit timber harvest in inventoried roadless areas, exempts the Tongass National Forest, provides no immediate protection for uninventoried roadless areas greater than 1,000 acres, and does not protect roadless areas from mining or off-road vehicles. Requests a final policy that adequately protects roadless areas by immediately prohibiting road building and timber harvest in all national forest roadless areas, includes the

		Tongass National Forest in the prohibition on road building and timber harvest, and provides interim protection from destructive activities for all non-inventoried roadless areas of 1,000 acres or larger.
145	14	Requests a final roadless policy that provides immediate and lasting protection for all roadless areas, including those in the Tongass National Forest. Also requests that the policy permanently stop all road building and timber sales along with mining, oil and gas development, off road vehicle use and other destructive activities in roadless areas larger than 1,000 acres.
146	43	Supports implementation of the Roadless Area Conservation Rule. Provides responses to the ten questions. Responses include support for national roadless area protection, comments regarding the extensive public involvement and support for the Rule, suggestions for keeping roadless areas roadless for forest health, a discussion of discretion given to forest managers to thin small diameter trees where needed to restore ecological processes, and the suggestion that the Rule has no effect on access to state and private inholdings. Suggests that roadless area values have already been identified through the public involvement process and that the real economic value of national forests comes from recreation and environmental quality of life. Requests protection from road building, commercial timber harvest, off-road vehicle use, and hard-rock mining, and suggests the need for evaluation of roadless areas for wilderness potential. Comments on the overwhelming public involvement and support for the Rule. Requests that the Forest Service stop preparing timber sales in the Tongass National Forest.
147	8	Opposes having millions of acres held in a roadless status. Suggests there is no need for this if resource managers are allowed to manage for legal uses. Requests that road decisions be made locally and guided by NFMA.
148	4	Opposes the Roadless Area Conservation Rule as it circumvents the intent of Congress and existing forest plans and was formulated with inadequate public involvement at the local level. Provides responses to the ten questions. Responses support local forest management, active management for forest health, request a complete inventory of forest stands, request that recreation potential evaluation must utilize accurate maps, and suggest using the collaborative concept at the beginning of the planning process. Responses also suggest that sustainable healthy forests should be the goal of all management by including descriptions for how disturbances can take place. Provides suggestions for private property management and access as well as suggestions for wilderness management and general forest management. Includes more discussion on public involvement and managing competing interests.
149	9	Supports the Roadless Area Conservation Rule. Suggests that wilderness should be preserved for generations to come as well as for its intrinsic value.
150	10	Requests that roadless areas be kept off-limits to timber harvest, mining, new road development and drilling. Mentions the overwhelming public response and support for the Roadless Area Conservation Rule. Suggests that local forest plans should identify roadless areas omitted from current inventories as well as prevent damage from off-road vehicles. Also suggests that most roadless areas should be preserved as wilderness and remain roadless in order to help prevent wildfires. Suggests that roadless area conservation is important to local economies because of the large amount of revenue generated from recreation. Also suggests that the Roadless Area Conservation Rule represents a balanced approach to forest management, and recommends that the Forest Service stop preparing timber sales that violate the Rule in the Tongass National Forest.

151	4	Supports the Roadless Area Conservation Rule and suggests that the Forest Service should protect roadless areas, including Alaska's National Forest, from timber harvest, road building, and mining.
152	3	Expresses support for TRCA's "Square Deal Initiative #1" which includes support for scientific management of fish and wildlife habitat, forest health, and restoration. Requests accessibility to forest lands for public use, especially hunters and anglers, while maintaining a functioning forest system and keeping roadless areas roadless. Supports a public process to determine designation of use. Suggests that criteria should be carefully defined for consideration of any exception regarding roads and forest management, that the interests of local people should be included, and that more wilderness areas should not be created by declaring them roadless.
153	20	Supports the Roadless Area Conservation Rule as it stands and expresses concern that the Bush Administration wants to undermine this policy by opening public wildlands to industrial development. Suggests that the policy should remain as it is in order to respect the will of the people.
154	9	Supports the Roadless Area Conservation Rule as a means to stop unsustainable activities by the timber industry. Expresses concern that although timber harvest creates jobs, it kills living organisms and makes it difficult for future generations to subsist. Questions the need to break into protected roadless areas when timber harvest opportunities already exist. Requests that the mapping error for Sallery Bay and Crab Bay in Tenakee inlet and others be fixed so that protected land is not exploited.
155	10	Opposes changes to the Roadless Area Conservation Rule that would weaken protection of roadless areas in the Tongass National Forest, specifically Crab and Sallery Bays in the Tenakee Inlet. Suggests that timber harvest in these areas would affect views, employment, tourism, and recreation due to restricted access to salmon streams. Lists specific areas where mapping areas need to be fixed as well as areas where roadless protection should be expanded. Requests that the Forest Service listen to the people of Alaska as it is "their" land.
156	6	Supports the Roadless Area Conservation Rule and mentions the overwhelming public response and support for the Rule. Opposes forest-by-forest decisionmaking and requests immediate protection of roadless areas including the Tongass National Forest.
157	11	Supports the Roadless Area Conservation Rule and mentions the overwhelming public response and support for the Rule. Opposes forest-by-forest decisionmaking and requests immediate protection of roadless areas including the Tongass National Forest.
158	199	Supports the Roadless Area Conservation Rule as it stands and opposes any changes that might weaken the Rule. Specifically mentions the social and economic importance of Alaska's Tongass and Chugach National Forests and the opportunities they provide for clean water, recreational and visitor opportunities, and habitat. Opposes forest-by-forest decisionmaking on timber harvest and mining because it puts corporate interests before public interest.
159	8	Supports road building and maintenance in proposed roadless areas. Suggests that forests be managed for multiple use as activities can benefit local people and local

		economies. Considers it wasteful for us not to use our natural resources as best we know how.
160	11	Requests that the Roadless Area Conservation Rule be immediately implemented, including the Tongass National Forest, to protect roadless areas from road construction, timber harvest, mining, and other forms of commercial extraction. Mentions the large number of public comments and support for protection of remaining roadless areas on national forests.
161	12	Expresses concern that the Roadless Area Conservation Rule did not give the recreational community enough opportunity to express concerns. Supports motorized and non-motorized use of national forests using local management along with NFMA and NEPA to tailor each area with appropriate management prescriptions. Suggests that roadless areas be set aside to increase water production in the future. Supports collaboration at the local level, forest protection through prescribed fire, timber harvest and allocations made in context of the forest plan, and consideration of the importance of resources to local areas and the nation. Requests that the Forest Service not prohibit activities and supports road building when necessary. Roadless areas should not automatically be proposed to Congress for Wilderness designation and should not be maintained under a specific designation for roadless area management under the forest plan. Suggests that regulations for roadless area management be general, short, and simple and guide the allocation process.
162	4	Provides a list of the ten questions and one-sentence responses to each which do not support the Roadless Area Conservation Rule. Some of the comments include, a request for no more roadless areas, the need to keep public land public, as well as the need for forest management access.
163	33	Requests immediate implementation of the Roadless Area Conservation Rule as it stands including the Tongass National Forest, and mentions the large number of public comments and support for the Rule. Supports road building to ensure forest health and access to state and private lands. Opposes weakening of roadless protection through forest-by-forest decisionmaking because this approach has cost taxpayers an \$8.4 million dollar backlog on the existing road system. Requests protection of roadless areas from road construction, timber harvest, mining, and other activities that compromise social and ecological values.
164	5	Supports the Roadless Area Conservation Rule and expresses concern regarding development in national forests. Requests that mining and timber industries stop destroying public land and that roadless areas should remain pristine and undeveloped to provide quieter forms of recreation. Opposes forest-by-forest decisionmaking because a national policy can provide quality experiences for all. Supports inclusion of the Tongass National Forest.
165	0	Supports the Roadless Area Conservation Rule as it represents a balanced approach to forest conservation. Suggests that preserving open space is a high priority for the residents of Lake County and has become a precious commodity. Opposes forest-by-forest decisions on timber harvest and development in roadless areas and requests the implementation of the Rule.
166	10	Responds to five questions supporting the Roadless Area Conservation Rule. Responses support a national policy to avoid local interests caving to timber interests. Mentions the overwhelming public support for the Rule and suggests that adherence to the Rule will allow local forest rangers to restore ecological

		processes and avert catastrophic wildfires. Supports prohibition of timber harvest, snowmobiling, and off-road vehicles; supports wilderness designation where criteria is met; and supports inclusion of the Tongass National Forest.
167	4	Opposes the Roadless Area Conservation Rule and requests that forests be managed by a pre-1994 policy. Expresses concern that the Rule is part of a Clinton-Gore agenda that caters to environmental groups without the consent of Congress. Also expresses concern about the negative impact that the Rule may have on Alaskan taxpayers and employment. Mentions the effect of the Dwyer Injunction (spotted owl study) on fire management and how this study resulted in the Los Alamos and Cloud Croft fires. Expresses concerns regarding Chief Dombeck and his political agenda.
168	17	Supports the Roadless Area Conservation Rule because roadless areas are priceless. Repeatedly mentions the overwhelming public involvement and support for the Rule.
169	15,697	Supports the Roadless Area Conservation Rule as it provides roadless area protection while maintaining public access to national forest land and adequately addresses issues of fire management, forest health, access, and local input. Opposes forest-by-forest decisionmaking as well as road building, timber harvest and other development in roadless areas. Also supports inclusion of the Tongass National Forest.
170	14	Supports the Roadless Area Conservation Rule as it protects roadless areas from road building and timber harvest. Disappointed in the reopening of public comment after the overwhelming response and support previously shown suggesting that adequate opportunities for input have already taken place. Opposes taxpayer subsidies for timber harvest and road building. Supports inclusion of the Tongass National Forest.
171	3	Supports the Roadless Area Conservation Rule and mentions the overwhelming public response and support for the Rule. Suggests that local planning does not provide adequate protection against roadbuilding and timber harvest and suggests that these activities should be prohibited. Also suggests that road building and timber harvest provide no economic advantage due to loss of revenue from recreation. Comments that fire suppression is not an issue, the Rule will have no effect on access to private land inholdings as well as no effect on the nation's energy supplies. Requests the Forest Service stop preparing timber sales on the Tongass National Forest as well as in Colorado.
172	78,479	Requests the Roadless Area Conservation Rule be implemented as written, including the Tongass National Forest. Mentions the large public response and support for the Rule. Opposes forest-by-forest decisionmaking regarding timber harvest, road construction, and other development in these pristine areas.
173	4	Opposes any changes to the Roadless Area Conservation Rule that would allow timber harvest in forests protected by the Rule, especially the Tongass National Forest. Also opposes allowing individual forests to opt out of the Rule and allow timber harvest, road building, and other development of these pristine areas.
174	1040	Supports the Roadless Area Conservation Rule as it stands. Opposes any changes that might weaken the Rule, suggesting that the Rule adequately addresses fire management, forest health, access, and local input. Specifically mentions the importance of Alaska's Tongass and Chugach National Forests and the

		opportunities they provide for clean water, recreational and visitor opportunities, and habitat.
175	5	Supports the Roadless Area Conservation Rule.
176	9	Supports the Roadless Area Conservation Rule as it protects 4.4 million acres in California. Mentions the overwhelming number of comments, 140,000 of them from Californians. Suggests that the Rule adequately addresses fire management, forest health, access, and local input. Opposes the weakening of national forest protection through forest-by-forest decisionmaking and requests protection from road construction, timber harvest, and drilling. Lists specific potential wilderness areas for protection as well as specific eligible and potential Wild and Scenic River sections. Requests the maintenance of scenic and recreational qualities of California.
177	24	Requests that forest roads and trails be maintained for expected use as an important part of forest management. Expresses concern that the Roadless Area Conservation Rule will lock up federal lands, negatively impacting recreation. Requests a "Back Country Recreation Area designation" to provide protection of natural resources as well as enhance back country recreation opportunities. Lists high points about responsible OHV recreationists and requests funding to support recreation and trail programs. Opposes the use of the term "roadless" for areas currently used. Suggests the importance of recreation to rural economies.
178	15	Supports every effort to protect roadless areas from exploitation, specifically road building and timber harvest. Expresses concern about development of roadless areas and the potential for subsidies at cost to the taxpayer. Supports the Roadless Area Conservation Rule due to overwhelming public support and asserts that environmental protection should be the top priority.
179	0	Suggests that the protection of national forests is crucial for clean water and air, wildlife habitat, biodiversity, recreation, and economic values. Supports the Roadless Area Conservation Rule as a first step toward conservation but requests the further protection of all roadless areas 1,000 acres and greater through wilderness designation.
180	65	Supports the Roadless Area Conservation Rule as it stands for wilderness and wild rivers, and specifically for protection of the Tongass and Chugach National Forests.
181	32	Supports the Roadless Area Conservation Rule as it protects 4.4 million acres in Colorado. Mentions the overwhelming number of comments, 28,000 of them from Coloradoans. Suggests that the Rule adequately addresses fire management, forest health, access, and local input. Opposes the weakening of national forest protection through forest-by-forest decisionmaking and requests protection from road construction, timber harvest, and drilling. Requests immediate protection of wildlife sanctuaries and immediate implementation of the Roadless Area Conservation Rule.
182	5	Supports the Roadless Area Conservation Rule, as it is not only ecologically necessary but has overwhelming public response and support as well. Suggests that the ten questions are biased and seem to invite opposition to the policy. Opposes forest-by-forest decisionmaking and suggests a national policy is needed to protect roadless areas. Suggests that the policy adequately addresses issues of fire management, forest health, access, and local input. Requests inclusion of the

		Tongass National Forest.
183	67	Supports the Roadless Area Conservation Rule because only national protection will guarantee that wildlands remain intact regardless of changing politics and personnel.
184	784	Supports implementation of the Roadless Area Conservation Rule. Provides responses to the ten questions. Responses include support for national roadless area protection, comments regarding the extensive public involvement and support for the Rule, support for keeping roadless areas roadless for forest health, discussion of discretion given to forest managers to thin small diameter trees where needed to restore ecological processes, that the Rule has no effect on access to state and private inholdings, assertion that roadless values have already been identified through the public process and that the real economic value of national forests comes from recreation and environmental quality of life, request that road building and commercial timber harvest be prohibited, and the roadless areas be evaluated for wilderness potential. Requests that the Forest Service stop preparing timber sales in the Tongass National Forest.
185	18	Opposes all trapping activities in roadless areas as they have been banned in many areas and have been deemed inhumane. Expresses concern that trapping is poorly regulated and not enforced and identifies some of the inhumane ways in which animals are treated throughout the trapping process.
186	0	Supports the Roadless Area Conservation Rule. Suggests that the Rule is a compromise between protection and industrial development and provides a balance between recreational and extractive uses. Suggests that the White Mountain National Forest provides solitude and recreational value for its residents as well as visitors and that the Rule helps protect biological, economic, and private property resources.
187	20	Requests that truth and facts be used when the final decision is made regarding the Roadless Area Conservation Rule. Expresses concern that special interest groups will do anything underhanded to get what they want and for that reason, the comment period has be reopened given that some procedures and protocols may not have been followed.
188	4	Suggests forest management should take place at the local level, and that the current planning process already requires consultation with local parties. Requests access for forest health management as well as unrestricted access to private and state inholdings. References ANILCA and the need to protect social and economic values in Alaska, including the direction no more lands in Alaska be proposed for wilderness designations. Requests that Alaska National Forests be reviewed by local officials in order to reestablish a reliable timber base for jobs that depend on the Tongass National Forest.
189	23	Expresses distrust toward the Administration's lack of desire to consider previous public comment and the Administration's actions to continue to seek comments in order to cater to industrial interests. Supports the Roadless Area Conservation Rule.
190	5	Requests protection of America's Heritage Forests by prohibiting timber harvest, road construction, and mining in all roadless areas with no exclusions or exemptions. Supports the Roadless Area Conservation Rule as it provides protection for roadless areas by providing clean air and water for our nation as

		well as habitat for rare, threatened, endangered, and sensitive species. Also mentions the overwhelming public response and support for the Rule.
191	20	Opposes all trapping activities in roadless areas as they have been banned in many areas and have been deemed inhumane.
192	721	Supports the Roadless Area Conservation Rule as forest protection is vital to the sustainability to the outdoor industry that supports over one million jobs. Supports long-term forest preservation without forest-by-forest review in order to avoid postponing preservation.
193	19	Supports immediate implementation of the Roadless Area Conservation Rule including protection for the Tongass National Forest since the Rule adequately addresses issues of fire management, forest health, access, and local input. Expresses opposition to forest-by-forest decisionmaking as well as road building, timber harvest, and other development in roadless areas. Requests protection of roadless areas from road construction, timber harvest, and mining.
194	22	Supports the Roadless Area Conservation Rule with no exemptions.
195	6	Supports the Roadless Area Conservation Rule with no exemptions or exclusions. Specifically requests protection for the Copper Mountain Roadless Area, the proposed Copper Salmon Wilderness, and all presently unroaded areas of the Elk River watershed.
196	20	Opposes any changes to the Roadless Area Conservation Rule that would allow timber harvest or road building on forests protected by the Rule, especially the Tongass National Forest. Also opposes allowing individual forests to opt out of the Rule and allow development of these pristine areas. Requests that the Rule be implemented immediately and defended in court to preserve the Tongass National Forest and other forests for future generations. Suggests that consideration of new comments is just a delaying tactic because two million Americans have already gone on record as supporting the Rule.
197	7296	Opposes weakening of the Roadless Area Conservation Rule, as it is already a compromise in that it allows road building, timber harvest, mining, and drilling. Also opposes forest-by-forest decisionmaking regarding development of roadless areas. Along with 95% of Americans who commented on this policy, supports protection of pristine forests, especially the Tongass National Forest,
198	24	Requests consideration of responses from the fourth volume of the Roadless Area Conservation Final Environmental Impact Statement. Recommends that national forest land be managed to provide a broad range of activities that reflect the diversity of our nation. Includes responses to the ten questions including concerns regarding local forest planning, community partnerships, fuel load buildup, sustaining forest health, access to private property, flexible management for changing conditions, wilderness designation, the need to base decisions on scientific data, litigation, reclamation of roads, and implementation based on a case-by-case basis.
199	4	Provides responses to the ten questions. Responses suggest the need to accommodate local needs and interests through public meetings with local residents, the need for wildfire and insect and disease management, landowners to be responsible, and the need for access to private property. Also recommends no new road construction, seeking input from all types of user groups, and managing

		lands for long-term renewal for wildlife and present use.
200	13	Requests that the Forest Service fix the Roadless Area Conservation Rule as it is the product of a flawed NEPA process, and is contrary to the agency's legal authority. Suggests that the process also ignored substantial concerns raised by local, state, and federal elected officials. Requests that roadless areas be accurately mapped at the forest level with access provided to private and state inholdings. Supports forest management at the local level to ensure forest health and wildlife protection. Suggests that economic and social relationships be evaluated, including those that directly impact working families and local communities. Also suggests a full range of management alternatives for forest plan revisions.
201	6	Opposes the Roadless Area Conservation Rule as it does not provide adequate information and is the result of a deeply flawed NEPA process. Suggests that the process also ignored substantial concerns raised by local, state, and federal elected officials. Requests that the Rule be revised to adequately address forest health concerns, access to private and state inholdings, and local input. Suggests that designated areas are poorly mapped and that areas should be returned to multiple use.
202	27	Supports the Roadless Area Conservation Rule as it is the product of an extensive federal rulemaking. Suggests that industrial extraction is allowed in more than half of National Forest System lands and that protecting remaining roadless areas allows diverse recreational opportunities. Opposes forest-by-forest decisionmaking on timber harvest and development in roadless areas.
203	11	Supports the Roadless Area Conservation Rule to safeguard forests from all roadbuilding, timber harvest, mining, and industrial development. Suggests that an overwhelming majority of comments support the Rule.
204	34	Suggests that the Advance Notice of Proposed Rulemaking is an inadequate alternative to protecting roadless areas. Suggests that wilderness cannot be commodified and that timber harvest, mining, and destructive activities should be prohibited on public lands.
205	8	Suggests that the Advance Notice of Proposed Rulemaking is an inadequate alternative to protecting roadless areas. Suggests that wilderness cannot be commodified and that timber harvest, mining, and destructive activities should be prohibited on public lands. Provides responses to the ten questions. Responses suggest that local planning has failed to provide adequate protection of roadless areas and that the Rule is needed to provide additional protection. Also suggests that the Rule received adequate public support, already provides exceptions for forest health management, has no affect on access to inholdings, already identifies roadless area values, and should be retained and implemented as is.
206	6	Expresses distrust toward President Bush regarding his disregard of public opinion for roadless areas. Suggests that certain ecosystems are unique to this country and should be protected for their intrinsic value as well as for the enjoyment of citizens. Supports the Roadless Area Conservation Rule to protect all roadless areas from timber harvest, roadbuilding, and mining.
207	13	Requests the Roadless Area Conservation Rule remain intact with no exemptions for the Tongass National Forest or any other roadless area on any national forest.
208	4	Supports the Roadless Area Conservation Rule with inclusion of protection for the

		Tongass National Forest. Opposes forest-by-forest decisionmaking as the Rule adequately upholds valid existing rights to property landowners. Mentions the overwhelming public comment and support for the Rule.
209	4	Requests a final roadless policy that provides immediate and lasting protection for all national forest roadless areas, including those in the Tongass National Forest. Also requests that the policy prohibit all road building and timber sales along with mining, oil and gas development, off-road vehicle use, and other destructive activities in roadless areas larger than 1,000 acres.
210	102	Lists five statements with options underneath to circle the level of support the individual gives to the statement. Strongly agrees in the following areas. First, the Roadless Area Conservation Rule failed to address concerns of local, state and federal officials; second, the Rule must be revised to better address forest health concerns at the local level; third, mapping of roadless areas needs to be improved and the Rule must address access to private and state lands; fourth, social and economic effects must be considered with special attention given to local communities surrounding roadless areas; and finally, requests exemption of the Black Hills National Forest from the Rule.
211	227	Expresses concern regarding plans to drill for oil in wildlife refuges because it would be unjust to native cultures and wildlife species. Requests that roadless areas be protected from roadbuilding and timber harvest and that the Endangered Species Act be strengthened. Suggests that the above concerns should be addressed for spiritual reasons.
212	4	Requests the Roadless Area Conservation Rule be kept in place as is.
213	388	Requests permanent protection of America's wild places by adding them to the country's National Wilderness Preservation System. Requests that wildlands receive permanent protection from timber harvest, mining, suburban sprawl, over-development, oil and gas drilling, off-road vehicles, air and water pollution, and the effects of climate change.
214	6	Requests that the Roadless Area Conservation Rule be immediately implemented, including the Tongass National Forest, to protect roadless areas from road construction, timber harvest, mining, and other forms of commercial extraction. Mentions the large number of public comment and support for protection of remaining roadless areas on national forests. Requests protection of remaining roadless areas in Oregon, especially Roaring River and Helso.
215	18	Requests that the Roadless Area Conservation Rule be immediately implemented, including the Tongass National Forest, to protect roadless areas from road construction, timber harvest, mining, and other forms of commercial extraction. Mentions the large volume of public comments and support for the protection of remaining roadless areas.
216	26	Provides responses to the ten questions. Responses suggest that local planning has failed to provide adequate protection of roadless areas and that the Roadless Area Conservation Rule is needed to provide additional protection. Also suggests that the Rule received adequate public support, already provides exceptions for forest health management, has no affect on access to inholdings, already identifies roadless area values, and should be retained and implemented as is.
217	8	Requests that national forests be protected from commercial timber harvest and

		other destructive activities. Supports a final roadless protection policy that immediately protects all national forest roadless areas of more than 1,000 acres and smaller areas of special biological importance. Requests the policy include the Tongass and Chugach National Forests and areas not previously inventoried as roadless. Also requests protection for all roadless areas from new road construction, timber harvest, mining, off-road vehicle use, oil and gas development, and other harmful activities.
218	4	Supports the Roadless Area Conservation Rule to protect national forests. Requests protection of the Tongass National Forest and opposes forest-by-forest decisionmaking in order to prevent timber harvest. Suggests that timber companies grow their own trees and not take the public's forest.
219	5	Supports the Roadless Area Conservation Rule in order to protect national forests from timber harvest, road building, and other developments. Mentions the large volume of public comment and support for the Rule as well and opposes forest-by-forest decisionmaking.
220	2	Requests that the Roadless Area Conservation Rule be revised to adequately address issues of recreational access, forest health, access to private and state inholdings, and local input. Also requests that roadless areas be mapped at the forest level with an inventory of classified and unclassified roads and that recreationists be involved in that process.
221	4	Requests immediate implementation of the Roadless Area Conservation Rule with no modifications, exemptions, or deletions.
222	102	Opposes all trapping activities in roadless areas as they have been banned in many areas and have been deemed inhumane.
223	1557	Supports the Roadless Area Conservation Rule as it provides a balanced approach to forest conservation from timber harvest, mining, and drilling activities in national forests.
224	6	Supports the Roadless Area Conservation Rule, mentioning the 47,000 Illinois residents who asked for a strong policy during the original comment period. Requests the Camp Hutchins area in the Shawnee National Forest be included as a roadless area. Includes responses to the ten questions. Responses identify additional roadless areas; and suggest protection of wildlife habitat and recreational values, maintenance of existing roads before building new ones, development of an adequate policy for forest management and private property access, public involvement, consideration of economic and recreational values, and request for prohibition of timber harvest, road construction, and off-road vehicles.
225	18	Requests a strengthened policy that provides immediate and lasting protection of roadless areas by prohibiting road building and timber harvest in national forests, including the Tongass National Forest. Also requests a moratorium on destructive activities in unroaded areas pending local forest plan revisions.
226	5702	Supports the Roadless Area Conservation Rule and mentions the overwhelming public support for the Rule. Requests that Congress oppose any attacks that attempt to undermine the protection of publicly owned forests and the environment.

227	5	Opposes restrictions that the Roadless Area Conservation Rule may have on recreational access in national forests. Supports wilderness designation, as it will protect sensitive areas while allowing other areas to provide recreational opportunities.
228	13,658	Letter contains text from Form 169 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule as it provides roadless area protection while maintaining public access to national forest land, and adequately addresses issues of fire management, forest health, access, and local input. Opposes forest-by-forest decisionmaking as well as road building, timber harvest, and other development in roadless areas. Also supports inclusion of the Tongass National Forest.
229	53	Letter contains text from Form 169 plus extra comments that suggest the need for a national roadless Rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Roadless Area Conservation Rule as it provides roadless area protection while maintaining public access to national forest land. It adequately addresses issues of fire management, forest health, access and local input. Opposes forest-by-forest decisionmaking as well as road building, timber harvest and other development in roadless areas. Also supports inclusion of the Tongass National Forest.
230	1161	Letter contains text from Form 127 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule as it protects forests from timber harvest, mining, and drilling activities already allowed on most National Forest System lands. Makes reference to the extensive public support and involvement for the Rule. Suggests that the Rule adequately addresses issues of fire management, forest health, and access, and gives local decision makers the necessary flexibility for sound forest management. Requests inclusion of protection for the Tongass National Forest and asserts that letting the Rule stand is the best way to protect roadless values.
231	968	Letter contains text from Form 127 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule as it protects forests from timber harvest, mining, and drilling activities already allowed on most National Forest System lands. Makes reference to the extensive public support and involvement for the Rule. Suggests that the Rule adequately addresses issues of fire management, forest health, and access, and gives local decision makers the necessary flexibility for sound forest management. Requests inclusion of protection for the Tongass National Forest and asserts that letting the Rule stand is the best way to protect roadless values.
232	3630	Letter contains text from Form 169 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule as it provides roadless area protection while maintaining public access to national forest land, and adequately addresses issues of fire management, forest health, access, and local input. Opposes forest-by-forest decisionmaking as well as road building, timber harvest, and other development in roadless areas. Also supports inclusion of the Tongass National Forest.
233	1484	Letter contains text from Form 172 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Requests the Roadless Area Conservation Rule be implemented as written including the Tongass National Forest. Mentions the large public response and support for the Rule. Opposes forest-by-forest

		decisionmaking regarding timber harvest, road construction, and other development in these pristine areas.
234	1275	Letter contains text from Form 172 plus extra comments that express concerns regarding trust and integrity. Requests the Roadless Area Conservation Rule be implemented as written including the Tongass National Forest. Mentions the large public response and support for the Rule. Opposes forest-by-forest decisionmaking regarding timber harvest, road construction, and other development in these pristine areas.
235	1272	Letter contains text from Form 172 plus extra comments that express concerns regarding future generations. Requests the Roadless Area Conservation Rule be implemented as written including the Tongass National Forest. Mentions the large public response and support for the Rule. Opposes forest-by-forest decisionmaking regarding timber harvest, road construction, and other development in these pristine areas.
236	2960	Letter contains text from Form 172 plus extra comments that express concerns regarding general environmental issues. Requests the Roadless Area Conservation Rule be implemented as written including the Tongass National Forest. Mentions the large public response and support for the Rule. Opposes forest-by-forest decisionmaking regarding timber harvest, road construction, and other development in these pristine areas.
237	449	Letter contains text from Form 197 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Opposes weakening the Rule, as it is already a compromise in that it allows road building, timber harvest, mining, and drilling. Also opposes forest-by-forest decisionmaking regarding development of these pristine areas. Along with 95% of Americans who commented on this policy, supports protection of pristine forests, especially the Tongass National Forest
238	641	Letter contains text from Form 197 plus extra comments that express concerns regarding trust and integrity. Opposes weakening the Rule, as it is already a compromise in that it allows road building, timber harvest, mining, and drilling. Also opposes forest-by-forest decisionmaking regarding development of these pristine areas. Along with 95% of Americans who commented on this policy, supports protection of pristine forests, especially the Tongass National Forest
239	311	Letter contains text from Form 197 plus extra comments that express concerns regarding future generations. Opposes weakening the Rule, as it is already a compromise in that it allows road building, timber harvest, mining, and drilling. Also opposes forest-by-forest decisionmaking regarding development of these pristine areas. Along with 95% of Americans who commented on this policy, supports protection of pristine forests, especially the Tongass National Forest
240	749	Letter contains text from Form 197 plus extra comments that express concerns regarding general environmental issues. Opposes weakening the Rule, as it is already a compromise in that it allows road building, timber harvest, mining, and drilling. Also opposes forest-by-forest decisionmaking regarding development of these pristine areas. Along with 95% of Americans who commented on this policy, supports protection of pristine forests, especially the Tongass National Forest
241	471	Letter contains text from Form 174 plus extra comments that express concerns

		regarding general environmental issues. Supports the Roadless Area Conservation Rule as it stands. Opposes any changes that might weaken the Rule, suggesting that the Rule adequately addresses fire management, forest health, access and local input. Specifically mentions the importance of Alaska's Tongass and Chugach National Forests and the opportunities they provide for clean water, recreational and visitor opportunities, and habitat.
242	215	Letter contains text from Form 174 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule as it stands. Opposes any changes that might weaken the Rule, suggesting that the Rule adequately addresses fire management, forest health, access, and local input. Specifically mentions the importance of Alaska's Tongass and Chugach National Forests and the opportunities they provide for clean water, recreational and visitor opportunities, and habitat.
243	145	Letter contains text from Form 174 plus extra comments that suggest the need of a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule as it stands. Opposes any changes that might weaken the Rule, suggesting that the Rule adequately addresses fire management, forest health, access and local input. Specifically mentions the importance of Alaska's Tongass and Chugach National Forests and the opportunities they provide for clean water, recreational and visitor opportunities, and habitat.
244	68	Letter contains text from Form 174 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule as it stands. Opposes any changes that might weaken the Rule, suggesting that the Rule adequately addresses fire management, forest health, access, and local input. Specifically mentions the importance of Alaska's Tongass and Chugach National Forests and the opportunities they provide for clean water, recreational and visitor opportunities, and habitat.
245	670	Letter contains the text from Form 79 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule as it protects pristine areas and is a compromise between protection and development. Opposes forest-by-forest decisions on timber harvest and development in roadless areas.
246	385	Letter contains the text from Form 79 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule as it protects pristine areas and is a compromise between protection and development. Opposes forest-by-forest decisions on timber harvest and development in roadless areas.
247	334	Letter contains the text from Form 79 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule as it protects pristine areas and is a compromise between protection and development. Opposes forest-by-forest decisions on timber harvest and development in roadless areas.
248	232	Letter contains the text from Form 79 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule as it protects pristine areas and is a compromise between protection and development. Opposes forest-by-forest decisions on timber harvest and development in roadless areas.

249	418	Letter contains the text from Form 169 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule as it provides roadless area protection while maintaining public access to national forest land and adequately addresses issues of fire management, forest health, access, and local input. Opposes forest-by-forest decisionmaking as well as road building, timber harvest and other development in roadless areas. Also supports inclusion of the Tongass National Forest.
250	515	Letter contains the text from Form 109 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule, including protection for the Tongass National Forest, as it adequately addresses fire management, forest health, access, and local input. Opposes forest-by-forest decisions on development in roadless areas.
251	462	Letter contains the text from Form 109 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule, including protection for the Tongass National Forest, as it adequately addresses fire management, forest health, access, and local input. Opposes forest-by-forest decisions on development in roadless areas.
252	875	Letter contains the text from Form 109 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule, including protection for the Tongass National Forest, as it adequately addresses fire management, forest health, access, and local input. Opposes forest-by-forest decisions on development in roadless areas.
253	408	Letter contains the text from Form 109 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule, including protection for the Tongass National Forest, as it adequately addresses fire management, forest health, access, and local input. Opposes forest-by-forest decisions on development in roadless areas.
254	504	Letter contains the text from Form 127 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule as it protects forests from timber harvest, mining, and drilling activities already allowed on most National Forest System lands. Makes reference to the extensive public support and involvement for the Rule. Suggests that the Rule adequately addresses issues of fire management, forest health, and access, and gives local decision makers the necessary flexibility for sound forest management. Requests inclusion of protection for the Tongass National Forest and asserts that letting the Rule stand is the best way to protect roadless values.
255	274	Letter contains the text from Form 127 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule as it protects forests from timber harvest, mining, and drilling activities already allowed on most National Forest System lands. Makes reference to the extensive public support and involvement for the Rule. Suggests that the Rule adequately addresses issues of fire management, forest health, and access, and gives local decision makers the necessary flexibility for sound forest management. Requests inclusion of protection for the Tongass National Forest and asserts that letting the Rule stand is the best way to protect roadless values.
256	46	Letter contains the text from Form 2 plus extra comments that suggest the need for

		a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule as it provides a balanced approach to forest conservation. Opposes forest-by-forest decisions on timber harvest and development in roadless areas and requests the inclusion of the Tongass National Forest.
257	149	Letter contains the text from Form 2 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule as it provides a balanced approach to forest conservation. Opposes forest-by-forest decisions on timber harvest and development in roadless areas and requests the inclusion of the Tongass National Forest.
258	100	Letter contains the text from Form 2 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule as it provides a balanced approach to forest conservation. Opposes forest-by-forest decisions on timber harvest and development in roadless areas and requests the inclusion of the Tongass National Forest.
259	53	Letter contains the text from Form 2 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule as it provides a balanced approach to forest conservation. Opposes forest-by-forest decisions on timber harvest and development in roadless areas and requests the inclusion of the Tongass National Forest.
260	29	Letter contains the text from Form 3 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Expresses concern regarding past damages to roadless areas. Supports the Rule as it provides a balanced approach to forest conservation. Opposes forest-by-forest decisions on timber harvest and development in roadless areas and requests the inclusion of the Tongass National Forest.
261	10	Letter contains the text from Form 3 plus extra comments that express concerns regarding trust and integrity. Expresses concern regarding past damages to roadless areas. Supports the Roadless Area Conservation Rule as it provides a balanced approach to forest conservation. Opposes forest-by-forest decisions on timber harvest and development in roadless areas and requests the inclusion of the Tongass National Forest.
262	4	Letter contains the text from Form 3 plus extra comments that express concerns regarding general environmental issues. Expresses concern regarding past damages to roadless areas. Supports the Roadless Area Conservation Rule as it provides a balanced approach to forest conservation. Opposes forest-by-forest decisions on timber harvest and development in roadless areas and requests the inclusion of the Tongass National Forest.
263	16	Letter contains the text from Form 3 plus extra comments that express concerns regarding future generations. Expresses concern regarding past damages to roadless areas. Supports the Roadless Area Conservation Rule as it provides a balanced approach to forest conservation. Opposes forest-by-forest decisions on timber harvest and development in roadless areas and requests the inclusion of the Tongass National Forest.
264	10	Letter contains the text from Form 7 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports immediate implementation of the Rule as written.

		Suggests that all roadless areas be protected from timber harvest, roadbuilding, and mining and that the Rule include the Tongass and Chugach National Forests.
265	8	Letter contains the text from Form 7 plus extra comments that express concerns regarding trust and integrity. Supports immediate implementation of the Roadless Area Conservation Rule as written. Suggests that all roadless areas be protected from timber harvest, roadbuilding, and mining and that the Rule include the Tongass and Chugach National Forests.
266	24	Letter contains the text from Form 7 plus extra comments that express concerns regarding general environmental issues. Supports immediate implementation of the Roadless Area Conservation Rule as written. Suggests that all roadless areas be protected from timber harvest, roadbuilding, and mining and that the Rule include the Tongass and Chugach National Forests.
267	10	Letter contains the text from Form 7 plus extra comments that express concerns regarding future generations. Supports immediate implementation of the Roadless Area Conservation Rule as written. Suggests that all roadless areas be protected from timber harvest, roadbuilding, and mining and that the Rule include the Tongass and Chugach National Forests.
268	4	Letter contains the text from Form 10 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule and urges abandonment of efforts to weaken roadless area protections. Opposes forest-by-forest decisionmaking and suggests that the Rule already contains the exemptions necessary to protect forest health, communities, homes and property, and access to inholdings.
269	5	Letter contains the text from Form 13 plus extra comments that express concerns regarding trust and integrity. Letter does not support the Roadless Area Conservation Rule as it was the product of a flawed NEPA process. Suggests the Rule be revised to adequately address forest health concerns, access to private and state inholdings, and local input. Also requests that roadless areas be accurately mapped at the forest level including an inventory of classified and unclassified roads. Modifications to the Rule must also take into consideration the need to access national forests to provide for congressionally mandated multiple uses. Other suggestions include the need to use up-to-date criteria for delineation of roadless areas, deletion of roaded portions of inventoried roadless areas from the inventory, and evaluation of economic and social relationships impacting working families and local communities. Requests a process to allow those most affected by management decisions on public lands to be heard.
270	5	Letter contains the text from Form 14 plus extra comments that express concerns regarding trust and integrity. Supports the Theodore Roosevelt Conservation Alliance's "Square Deal Initiative #1." Suggests that the 58 million acres under consideration should be kept roadless and that criteria should be carefully defined for the consideration of any exceptions for providing road access for forest management. Also suggests that decisionmaking should include the interests of local people while the final decision authority to build roads in roadless areas should be retained by the Chief of the Forest Service.
271	60	Letter contains the text from Form 14 plus extra comments that express concerns regarding general environmental issues. Supports the Theodore Roosevelt Conservation Alliance's "Square Deal Initiative #1." Suggests that the 58 million acres under consideration should be kept roadless and that criteria should be

		carefully defined for the consideration of any exceptions for providing road access for forest management. Also suggests that decisionmaking should include the interests of local people while the final decision authority to build roads in roadless areas should be retained by the Chief of the Forest Service.
272	31	Letter contains the text from Form 14 plus extra comments that express concerns regarding future generations. Supports the Theodore Roosevelt Conservation Alliance's "Square Deal Initiative #1." Suggests that the 58 million acres under consideration should be kept roadless and that criteria should be carefully defined for the consideration of any exceptions for providing road access for forest management. Also suggests that decisionmaking should include the interests of local people while the final decision authority to build roads in roadless areas should be retained by the Chief of the Forest Service.
273	5	Letter contains the text from Form 15 plus extra comments that express concerns regarding trust and integrity. Expresses disappointment and distrust toward the Bush Administration's attempt to weaken forest protections and ignore public input. Requests the immediate implementation of the Roadless Area Conservation Rule.
274	6	Letter contains the text from Form 16 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule and all efforts to oppose the weakening of forest protections. Suggests that roadless areas are valuable for high quality fish and wildlife habitat, backcountry recreation, and clean water supplies.
275	18	Letter contains the text from Form 18 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Expresses disappointment and distrust toward the Bush Administration's attempt to weaken forest protections and ignore public input. Requests the immediate implementation of the Rule.
276	42	Letter contains the text from Form 18 plus extra comments that express concerns regarding trust and integrity. Expresses disappointment and distrust toward the Bush Administration's attempt to weaken forest protections and ignore public input. Requests the immediate implementation of the Roadless Area Conservation Rule.
277	60	Letter contains the text from Form 18 plus extra comments that express concerns regarding general environmental concerns. Expresses disappointment and distrust toward the Bush Administration's attempt to weaken forest protections and ignore public input. Requests the immediate implementation of the Roadless Area Conservation Rule.
278	32	Letter contains the text from Form 18 plus extra comments that express concerns regarding future generations. Expresses disappointment and distrust toward the Bush Administration's attempt to weaken forest protections and ignore public input. Requests the immediate implementation of the Roadless Area Conservation Rule.
279	24	Letter contains the text from Form 19 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule and urges abandonment of efforts to weaken roadless area protections. Opposes forest-by-forest decisionmaking and suggests that the Rule already contains the exemptions necessary to protect forest

		health, communities, homes and property, and access to inholdings. Also suggests that previous public involvement processes have proven public support for roadless area protections.
280	36	Letter contains the text from Form 19 plus extra comments that express concerns regarding general environmental concerns. Supports the Roadless Area Conservation Rule and urges abandonment of efforts to weaken roadless area protections. Opposes forest-by-forest decisionmaking and suggests that the Rule already contains the exemptions necessary to protect forest health, communities, homes and property, and access to inholdings. Also suggests that previous public involvement processes have proven public support for roadless area protections.
281	17	Letter contains the text from Form 19 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule and urges abandonment of efforts to weaken roadless area protections. Opposes forest-by-forest decisionmaking and suggests that the Rule already contains the exemptions necessary to protect forest health, communities, homes and property, and access to inholdings. Also suggests that previous public involvement processes have proven public support for roadless area protections.
282	21	Letter contains the text from Form 27 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Opposes any changes to the Rule that would allow timber harvest in pristine areas of any national forest, especially the Tongass National Forest. Also opposes forest-by-forest decisionmaking for roadless area management. Suggests that the Tongass is valuable for abundant wildlife and should be protected. Also suggests that previous public support for the Rule should not be ignored.
283	27	Letter contains the text from Form 27 plus extra comments that express concerns regarding trust and integrity. Opposes any changes to the Roadless Area Conservation Rule that would allow timber harvest in pristine areas of any national forest, especially the Tongass National Forest. Also opposes forest-by-forest decisionmaking for roadless area management. Suggests that the Tongass is valuable for abundant wildlife and should be protected. Also suggests that previous public support for the Rule should not be ignored.
284	67	Letter contains the text from Form 27 plus extra comments that express concerns regarding general environmental issues. Opposes any changes to the Roadless Area Conservation Rule that would allow timber harvest in pristine areas of any national forest, especially the Tongass National Forest. Also opposes forest-by-forest decisionmaking for roadless area management. Suggests that the Tongass is valuable for abundant wildlife and should be protected. Also suggests that previous public support for the Rule should not be ignored.
285	15	Letter contains the text from Form 27 plus extra comments that express concerns regarding future generations. Opposes any changes to the Roadless Area Conservation Rule that would allow timber harvest in pristine areas of any national forest, especially the Tongass National Forest. Also opposes forest-by-forest decisionmaking for roadless area management. Suggests that the Tongass is valuable for abundant wildlife and should be protected. Also suggests that previous public support for the Rule should not be ignored.
286	4	Letter contains the text from Form 31 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule as it

		protects roadless areas in our national forests, especially the Tongass National Forest. Opposes any changes that would weaken the January Rule including forest-by-forest decision-making.
287	16	Letter contains the text from Form 31 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule as it protects roadless areas in our national forests, especially the Tongass National Forest. Opposes any changes that would weaken the January Rule including forest-by-forest decision-making.
288	7	Letter contains the text from Form 31 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule as it protects roadless areas in our national forests, especially the Tongass National Forest. Opposes any changes that would weaken the January Rule including forest-by-forest decision-making.
289	64	Letter contains the text from Form 49 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule as roadless areas are important for recreational experiences and ecosystem protection. Suggests that the Rule is the result of extensive participation and adequately addresses issues of fire management, forest health, access, and local input.
290	26	Letter contains the text from Form 49 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule as roadless areas are important for recreational experiences and ecosystem protection. Suggests that the Rule is the result of extensive participation and adequately addresses issues of fire management, forest health, access, and local input.
291	19	Letter contains the text from Form 49 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule as roadless areas are important for recreational experiences and ecosystem protection. Suggests that the Rule is the result of extensive participation and adequately addresses issues of fire management, forest health, access, and local input.
292	21	Letter contains the text from Form 49 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule as roadless areas are important for recreational experiences and ecosystem protection. Suggests that the Rule is the result of extensive participation and adequately addresses issues of fire management, forest health, access, and local input.
293	16	Letter contains the text from Form 58 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should

		respect the fact that the Rule enjoys overwhelming public support.
294	3	Letter contains the text from Form 58 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
295	7	Letter contains the text from Form 58 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
296	10	Letter contains the text from Form 59 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
297	8	Letter contains the text from Form 59 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
298	7	Letter contains the text from Form 59 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation

		Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
299	6	Letter contains the text from Form 60 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
300	5	Letter contains the text from Form 60 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
301	6	Letter contains the text from Form 61 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
302	6	Letter contains the text from Form 61 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that the role of local forest planning is to provide additional protection of roadless areas, that the Rule is the result of an extensive public involvement process, and that the Rule already

		adequately provides for forest health management, access to inholdings, wilderness designations, and identifies roadless area values. Also suggests that the economic value of roadless areas comes from recreation and environmental quality, that timber harvest and roadbuilding should be prohibited, and that the Bush Administration should respect the fact that the Rule enjoys overwhelming public support.
303	170	Letter contains the text from Form 68 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Requests immediate implementation of the Rule, including protection of the Tongass National Forest. Opposes forest-by-forest decisions on timber harvest and development. Suggests that roadless areas should be protected from road building and commercial extraction.
304	9	Letter contains the text from Form 68 plus extra comments that express concerns regarding trust and integrity. Requests immediate implementation of the Roadless Area Conservation Rule, including protection of the Tongass National Forest. Opposes forest-by-forest decisions on timber harvest and development. Suggests that roadless areas should be protected from road building and commercial extraction.
305	31	Letter contains the text from Form 68 plus extra comments that express concerns regarding future generations. Requests immediate implementation of the Roadless Area Conservation Rule, including protection of the Tongass National Forest. Opposes forest-by-forest decisions on timber harvest and development. Suggests that roadless areas should be protected from road building and commercial extraction.
306	42	Letter contains the text from Form 68 plus extra comments that express concerns regarding general environmental issues. Requests immediate implementation of the Roadless Area Conservation Rule, including protection of the Tongass National Forest. Opposes forest-by-forest decisions on timber harvest and development. Suggests that roadless areas should be protected from road building and commercial extraction.
307	32	Letter contains the text from Form 74 plus extra comments that suggest the need for a national roadless rule or suggest keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule.
308	8	Letter contains the text from Form 74 plus extra comments that express concerns regarding trust and integrity. Supports the Roadless Area Conservation Rule.
309	28	Letter contains the text from Form 74 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule.
310	37	Letter contains the text from Form 74 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule.
311	11	Letter contains the text from Form 80 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule as it is the result of an extensive public involvement process. Suggests that roadless areas are a great treasure and should be preserved for future generations.

312	20	Letter contains the text from Form 80 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule as it is the result of an extensive public involvement process. Suggests that roadless areas are a great treasure and should be preserved for future generations.
313	27	Letter contains the text from Form 80 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule as it is the result of an extensive public involvement process. Suggests that roadless areas are a great treasure and should be preserved for future generations.
314	96	Letter contains the text from Form 83 plus extra comments that express concerns regarding future generations. Suggests that roadless areas provide clean water, high quality fish and wildlife habitat and should be protected by implementation of the Roadless Area Conservation Rule. Opposes forest-by-forest decisions on roadless area management.
315	12	Letter contains the text from Form 83 plus extra comments that express concerns regarding general environmental issues. Suggests that roadless areas provide clean water, high quality fish and wildlife habitat and should be protected by implementation of the Roadless Area Conservation Rule. Opposes forest-by-forest decisions on roadless area management.
316	4	Letter contains the text from Form 91 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule as it protects pristine areas while still allowing access for forest health management. Opposes forest-by-forest decisions on timber harvest and development in roadless areas.
317	4	Letter contains the text from Form 91 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule as it protects pristine areas while still allowing access for forest health management. Opposes forest-by-forest decisions on timber harvest and development in roadless areas.
318	5	Letter contains the text from Form 106 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule as it offers a balanced approach to forest conservation without compromising public health and safety or access to inholdings. Opposes forest-by-forest decisions on roadless area management.
319	7	Letter contains the text from Form 111 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that local forest planning has failed to adequately protect roadless areas and that the Rule was developed through an extensive public involvement process. Also suggests that the Rule already provides exceptions for forest health management, that forest fires should be left to burn in most cases, and that access to private property is already ensured in the Rule. Letter provides a list of environmental, social, and cultural values associated with roadless areas and requests that timber harvest, mining, oil drilling, off-road vehicle use, and pack animals should be banned. Suggests that the ten questions are highly biased and unnecessary because the public has already spoken in support of the Rule.
320	5	Letter contains the text from Form 111 plus extra comments that express concerns

		regarding trust and integrity. Supports the Roadless Area Conservation Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that local forest planning has failed to adequately protect roadless areas and that the Rule was developed through an extensive public involvement process. Also suggests that the Rule already provides exceptions for forest health management, that forest fires should be left to burn in most cases, and that access to private property is already ensured in the Rule. Letter provides a list of environmental, social, and cultural values associated with roadless areas and requests that timber harvest, mining, oil drilling, off-road vehicle use, and pack animals should be banned. Suggests that the ten questions are highly biased and unnecessary because the public has already spoken in support of the Rule.
321	4	Letter contains the text from Form 111 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule because individual forest planning has inadequately protected roadless areas. Provides responses to the ten questions. Responses suggest that local forest planning has failed to adequately protect roadless areas and that the Rule was developed through an extensive public involvement process. Also suggests that the Rule already provides exceptions for forest health management, that forest fires should be left to burn in most cases, and that access to private property is already ensured in the Rule. Letter provides a list of environmental, social, and cultural values associated with roadless areas and requests that timber harvest, mining, oil drilling, off-road vehicle use, and pack animals should be banned. Suggests that the ten questions are highly biased and unnecessary because the public has already spoken in support of the Rule.
322	14	Letter contains the text from Form 112 plus extra comments that express concerns regarding future generations. Supports the Theodore Roosevelt Conservation Alliance's "Square Deal Initiative #1." Suggests that the 58 million acres under consideration should be kept roadless and that criteria should be carefully defined for the consideration of exceptions for providing road access for forest management. Also suggests that decisionmaking should include the interests of local people while the final decision authority to build roads in roadless areas should be retained by the Chief of the Forest Service.
323	10	Letter contains the text from Form 112 plus extra comments that express concerns regarding general environmental issues. Supports the Theodore Roosevelt Conservation Alliance's "Square Deal Initiative #1." Suggests that the 58 million acres under consideration should be kept roadless and that criteria should be carefully defined for the consideration of exceptions for providing road access for forest management. Also suggests that decisionmaking should include the interests of local people while the final decision authority to build roads in roadless areas should be retained by the Chief of the Forest Service.
324	27	Letter contains text from Form 117 plus extra comments that express concerns regarding general environmental issues. Mentions that 95% of Americans support the Roadless Area Conservation Rule. Requests that actions be taken to ensure that the Rule is not undermined and that the Forest Service listen to the will of the American people. Requests that the Rule be implemented immediately and without exemption.
325	10	Letter contains text from Form 117 plus extra comments that express concerns regarding future generations. Mentions that 95% of Americans support the Roadless Area Conservation Rule. Requests that actions be taken to ensure that the Rule is not undermined and that the Forest Service listen to the will of the

		American people. Requests that the Rule be implemented immediately and without exemption.
326	36	Letter contains text from Form 134 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule as it protects 4.4 million acres in Colorado. Mentions the overwhelming number of comments, 28,000 of them from Coloradoans, supporting the Rule. Comments that the Rule adequately addresses fire management, forest health, access, and local input. Opposes the weakening of national forest protection through forest-by-forest decisionmaking and requests protection from road construction, timber harvest, and drilling.
327	16	Letter contains text from Form 134 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule as it protects 4.4 million acres in Colorado. Mentions the overwhelming number of comments, 28,000 of them from Coloradoans, supporting the Rule. Comments that the Rule adequately addresses fire management, forest health, access, and local input. Opposes the weakening of national forest protection through forest-by-forest decisionmaking and requests protection from road construction, timber harvest, and drilling.
328	70	Letter contains text from Form 134 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule as it protects 4.4 million acres in Colorado. Mentions the overwhelming number of comments, 28,000 of them from Coloradoans, supporting the Rule. Comments that the Rule adequately addresses fire management, forest health, access, and local input. Opposes the weakening of national forest protection through forest-by-forest decisionmaking and requests protection from road construction, timber harvest, and drilling.
329	75	Letter contains text from Form 137 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Requests protection of all national forest roadless areas through a national policy to prohibit road construction and timber harvest.
330	25	Letter contains text from Form 137 plus extra comments that express concerns regarding general environmental issues. Requests protection of all national forest roadless areas through a national policy to prohibit road construction and timber harvest.
331	18	Letter contains text from Form 137 plus extra comments that express concerns regarding future generations. Requests protection of all national forest roadless areas through a national policy to prohibit road construction and timber harvest.
332	5	Letter contains text from Form 142 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule, as it is the product of the most extensive federal Rulemaking in history relating to public involvement and response. Comments on the quality recreational opportunities provided by roadless lands in Colorado. Also comments on how the Rule provides a balanced approach to forest conservation and addresses issues of fire management, forest health, access, and local input. Opposes forest-by-forest decisionmaking as it weakens forest protection and asserts that timber harvest leads to the degradation of these lands. Supports preservation of roadless areas for recreational experiences.

333	4	Letter contains text from Form 142 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule, as it is the product of the most extensive federal Rulemaking in history relating to public involvement and response. Comments on the quality recreational opportunities provided by roadless lands in Colorado. Also comments on how the Rule provides a balanced approach to forest conservation and addresses issues of fire management, forest health, access, and local input. Opposes forest-by-forest decisionmaking as it weakens forest protection and asserts that timber harvest leads to the degradation of these lands. Supports preservation of roadless areas for recreational experiences.
334	37	Letter contains text from Form 158 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule as it stands and opposes any changes that might weaken the Rule. Specifically mentions the social and economic importance of Alaska's Tongass and Chugach National Forests and the opportunities they provide for clean water, recreational and visitor opportunities, and habitat. Opposes forest-by-forest decisionmaking on timber harvest and mining because it puts corporate interests before public interest.
335	7	Letter contains text from Form 180 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Supports the Rule as it stands for wilderness and wild rivers, specifically for protection of the Tongass and Chugach National Forests.
336	15	Letter contains text from Form 180 plus extra comments that express concerns regarding future generations. Supports the Roadless Area Conservation Rule as it stands for wilderness and wild rivers, specifically for protection of the Tongass and Chugach National Forests.
337	58	Letter contains text from Form 180 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule as it stands for wilderness and wild rivers, specifically for protection of the Tongass and Chugach National Forests.
338	5	Letter contains text from Form 215 plus extra comments that suggest the need for a national roadless rule or support keeping or strengthening the Roadless Area Conservation Rule. Requests that the Rule be immediately implemented, including the Tongass National Forest, to protect roadless areas from road construction, timber harvest, mining, and other forms of commercial extraction. Mentions the large number of public comments and support for protection of remaining roadless areas on national forests.
339	4	Letter contains text from Form 219 plus extra comments that express concerns regarding general environmental issues. Supports the Roadless Area Conservation Rule in order to protect national forests from timber harvest, road building, and other developments. Mentions the large number of public comments and support for the Rule and opposes forest-by-forest decisionmaking.

## Appendix F

### Site-Specific Requests for Inclusion/Exemption

The following tables list the specific places respondents request to be included in/excluded from national roadless area protection or to be recommended/not recommended to Congress for wilderness designation. Note that because respondents sometimes reference multiple areas, there is some overlap in the requests.

**Table F-1. Site-Specific Requests that Areas be Included in National Roadless Area Protection**

#### Region 1 Northern

Area	National Forest or Grassland	State
Idaho. (Conservation/Preservation Organization, Williams, OR - #A21210.45500)	Multiple	ID
Idaho's remaining 8 million acres of wild lands. (Business, Boise, ID - #A20362.10150)	Multiple	ID
Idaho's wild forests. (Individual, La Canada Flintridge, CA - #A803.90110)	Multiple	ID
Northern Rockies (Idaho). (Individual, Boise, ID - #A5873.90110)	Multiple	ID
I live in Idaho . . . I want to see all 9 million of those acres protected by the roadless rule. . . . including the Boulder-White Clouds, the Pahsimeroi, the Pioneer Mountains, the Smokey Mountains, The Lost River Range. (Individual, Stanley, ID - #A16269.45620)	Multiple	ID
The Continental Divide Trail (Individual, Helena, MT - #A7359.45621)	Multiple	ID, MT
Areas of Montana, Idaho, and Washington, such as the Gallatin Range, the Big Belts, the Whitetail-Haystack-O'Neill roadless area, the White Sand and Cove-Mallard roadless areas, and the Kettle Range. (Conservation/Preservation Organization, Bozeman, MT - #A20601.45621)	Multiple	ID, MT, WA
The following National Forests: Beaverhead, Bitterroot, Clearwater, Custer, Deerlodge, Flathead, Gallatin, Helena, Idaho Panhandle (ID), Kootenai, Lewis and Clark, Lolo, Nez Perce (ID). (Individual, Missoula, MT- #A17281.45622)	Multiple	ID, MT, WA
All roadless areas including those encompassed in the Northern Rockies Ecosystem Protection Act and including one thousand acres in size should be protected to preserve their wilderness character and eligibility for congressional Wilderness designation, rather than being deferred later to the forest planning process. (Individual, Elmhurst, IL - #A15290.45320)	Multiple	ID, MT, WY
The Greater Yellowstone area. (Individual, Santa Monica, CA - #A9909.45331)	Multiple	ID, MT, WY
6 million acres in Greater Yellowstone. (Individual, Bozeman, MT - #A661.50510)	Multiple	ID, MT, WY
Cove/Mallard, Selkirk Mountain Roadless Area in Idaho, the South Fork Mountain Area, Quartzite Roadless Area, Kettle Range, Tucannon, Wenatchee Creek, Dark Divide, Long Swamp, Granite Mt., Jackson/Graphite, and Mt. Bonaparte in Washington are just a few designated roadless areas. (Business, Spokane, WA - #A22047.45621)	Multiple	ID, WA
Montana. (Individual, Lebanon, NH - #A4286.90110)	Multiple	MT
Roadless areas in Montana. (Individual, Missoula, MT - #A5604.45621)	Multiple	MT
6.4 million acres in Montana. . . . the Bitterroot forest. (Individual, Hamilton, MT - #A5804.10150)	Multiple	MT
Timberlands in N.W. Montana. (Individual, Libby, MT - #A5586.90130)	Multiple	MT
The City of Bozeman lies in the heart of an area surrounded by spectacularly	Multiple	MT

beautiful—yet unprotected—roadless lands, including the Bridger Mountains, the Gallatin Range, the Tobacco Root Mountains, and portions of the Madison Range. (Joe N. Frost, Commissioner, Bozeman City Commission, Bozeman, MT - #A20731.45620)		
The Scotchman Peak area of the West Cabinets, the northern reaches of the Swan Mountains and the Bitterroots. (Individual, Kalispell, MT - #A21027.10111)	Multiple	MT
The 17.2 million acres of remaining Roadless Areas of the Northern Rockies—including but not limited to the Glacier National Park, the Swan Range, the Rocky Mountain Front, the Gallatin Range, the Absoroka-Beartooth Wilderness, the Rattlesnake Wilderness, and the Bitterroot Wilderness. (Individual, No Address - #A23580.45621)	Multiple	MT
Montana . . . Pryors, Snowies. . . (Individual, Missoula, MT - #A17700.45621)	Multiple	MT
The Scotchman Peaks, Cube Iron-Silcox, Trout Creek, Cabinet Additions, Cataract, Galena, Allen Peak, Roderick, Gold Hill, Northwest Peaks, Buckhorn Ridge . . . Montana. (Individual, Somers, MT - #A8210.45624)	Multiple	MT
Elkhorns, Big Belts, Continental Divide and Rocky Mountain Front. (James Smith, Commissioner, Helena City Commission, Helena, MT - #A20615.45621)	Multiple	MT
The Gallatin, Yellowstone and Madison Rivers. (Individual, San Antonio, TX - #A10116.45620)	Multiple	MT, WY
The Snake and Yellowstone Rivers. (Individual, Gladwyne, PA - #A10116.45620)	Multiple	MT, WY
Wyoming. (Individual, East Greenbush, NY - #A8821.90110)	Multiple	WY
I would like to see the Roadless Area Rule apply to <u>ALL</u> national forests (New England, Eastern, Midwest, Western, Alaskan Tongass, and other Alaskan forests etc.) (Individual, Endeavor, WI - #A8231.45622)	Multiple	Multiple
The North/West Big Hole and East/West Pioneers. (Individual, Butte, MT - #A16710.45624)	Beaverhead-Deerlodge	MT
Roadless areas in Montana. . . . Helena Forest Areas: Camas Lakes—Big Belt Mountains Mount Baldy—Big Belt Mountains Hedges Mountain—Big Belt Mountains Elkhorn Mountains Range Black Mountain—Near Helena Nevada Mountain—Continental Divide Silver King/Falls Creek Grassy Mountain—Big Belt Mountains Electric Peak/Blackfoot Meadows—Continental Divide. Lewis & Clark Forest Areas: All areas along the Rocky Mountain Front Lola Forest Area: Cuba Iron/Silcox Deerlodge/Beaverhead Forest Areas: Tobacco Root Mountains East Pioneer Mountains. (Individual, Helena, MT- #A29425.45620)	Beaverhead-Deerlodge, Lewis and Clark, Helena	MT
Places like the Bitterroot Selway. (Individual, Missoula, MT - #A16787.10150)	Bitterroot	ID, MT
Roadless lands in my area - the Bitterroot Valley. (Individual, Corvallis, MT - #A8285.50000)	Bitterroot	MT
Tepee Point lookout (Bitterroot Forest, Sula Dist.) . . . the Anaconda-Pintlar Wilderness . . . the Sapphires. (Individual, Billings, MT - #A8697.45621)	Bitterroot	MT
The Targhee, Boise, and Payette. (Conservation/Preservation Organization, Nevada City, CA - #A4941.45621)	Boise, Payette, Targhee	ID, MT, WY
The Great Burn Roadless Area of the Clearwater NF. (Individual, Moscow, ID - #A5712.45622)	Clearwater	ID
<b>Idaho Panhandle National Forests:</b> (only portions in the Big Wild Ecosystem, mainly the upper St. Joe River drainage are listed—others outside the ecosystem should also be protected) <u>Mallard-Larkins</u> (see Clearwater National Forest) <u>Meadow Creek/Vanderbilt-Upper St. Joe</u> (see Clearwater National Forest) <u>Mosquito Fly—1150.</u> <u>Midget Peak—1151.</u> This area borders the St. Joe River. . . . Simmons Creek is a tributary to the fabled St. Joe River.	Clearwater, Idaho Panhandle, Lolo	ID, MT, WA

<p><u>Sheep Mountain/State Line (also Lolo National Forest)—1779</u> . . . near the headwaters of the St. Joe River. . . the Bitterroot Crest.  <u>Grandmother Mountain—1148</u>. . . around Widow Mountain. . . a corner of it drains into the St. Maries River. (Conservation/Preservation Organization, Moscow, ID - #A22654.25200)</p>		
<p><u>Clearwater National Forest</u>  <u>The Great Burn—1301</u> (or Hoodoo also on the Lolo National Forest) . . . Kelly Creek and includes its confluence with Cayuse Creek. . . the North Fork of the Clearwater. . . Fish Lake . . . in the Jap, Siam, Boose and Shell Creek drainages.  <u>Weitas Creek—1306</u> (Bighorn-Weitas) . . . along lower Weitas Creek. . . the North Fork Clearwater. . . Upper Cayuse Creek. (Conservation/Preservation Organization, Moscow, ID - #A22654.91220)  <u>Pot Mountain—1304</u>. (Conservation/Preservation Organization, Moscow, ID - #A22654.50520)  <u>Moose Mountain—1305</u>. (Conservation/Preservation Organization, Moscow, ID - #A22654.45310)  <u>Meadow Creek/Vanderbilt and Rawhide—1302 and 1313</u> (also Idaho Panhandle and Lolo National Forests) . . . both the North Fork proper and the St. Joe Rivers . . . lakes like Trail, Oregon, 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 appendices (page C-224). This has been done and the two areas should be considered as one roadless area. . . the North Fork River.                  Selway-Bitterroot Additions:                  These are all logical additions to the Selway Bitterroot Wilderness and many were previously included in the old Selway Primitive Area. They contain crucial low elevation habitat and important wet meadow complexes.                  (Conservation/Preservation Organization, Moscow, ID - #A22654.25200)  <u>White Sand Creek, North Fork—1309</u>. . . land near Beaver Creek. . . This is a wet, high elevation area in the upper Lochsa.  <u>Sneakfoot—1314</u>. . . White Sand and part of the Lochsa Face  <u>Lochsa Face—1311</u>. 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.  <u>Lolo—1805</u> (mostly on the Lolo National Forest) This is part of a large roadless area that encompasses the north flank of Lolo Peak, the northern boundary of the Selway-Bitterroot Wilderness. (Conservation/Preservation Organization, Moscow, ID - #A22654.45310)  <u>Section 16 Roadless—1310</u> This area is adjacent to the Selway-Bitterroot Wilderness and just south of the Lolo Creek area. (Conservation/Preservation Organization, Moscow, ID - #A22654.45400)  <u>North Lochsa Country</u> This is the northern flank of the scenic Lochsa River.  <u>Fish and Hungery Creek—1307</u> (also called North Lochsa Slope). . . the Lochsa River corridor. It also contains the only unroaded section of the Lewis and Clark trail remaining in the entire country.  <u>Weir/Post Office—1308</u>. . . Ashpile Peak and Weir Creek Hot Springs and is adjacent to Indian Post Office. (Conservation/Preservation Organization, Moscow, ID - #A22654.45100)  <u>Eldorado Creek—1312</u>. . . White Pine region. (Conservation/Preservation Organization, Moscow, ID - #A22654.45310)</p>	<p>Clearwater, Lolo</p>	<p>ID, MT</p>
<p>Clearwater, Nez Perce and St. Joe National Forest. (Individual, Moscow, ID - #A11643.45621)</p>	<p>Clearwater, Nez Perce, St. Joe</p>	<p>ID</p>
<p>Beartooth District. (Individual, Red Lodge, MT - #A12473.90130)</p>	<p>Custer</p>	<p>MT</p>
<p>The Beartooths, and the Bob. (Individual, Missoula, MT - #A6480.10150)</p>	<p>Custer, Flathead, Lewis and Clark</p>	<p>MT</p>
<p>Here on the Flathead National Forest the roadless areas of the Swan Front, Swan</p>	<p>Flathead</p>	<p>MT</p>

Crest, Mt. Hefty, Tuchuck, Thompson-Seaton, Nasukoin, Lost Jack, Jewel Basin, and Le Beau. (Individual, Kalispell, MT - #A28230.45621)		
Northwest Montana, between Glacier National Park and the Flathead National Forest. (Individual, Winnebago, IL - #A1471.90110)	Flathead, Glacier National Park	MT
Seeley Lake, Montana in the heart of the Swan Valley and near the Bob Marshall and Scapegoat Wilderness Areas. (Individual, Seeley Lake, MT - #A6434.45621)	Flathead, Helena, Lewis and Clark, Lolo	MT
The Lolo and Flathead National Forest. (Individual, Condon, MT - #A13397.45621)	Flathead, Lolo	MT
The Roadless Area on Lie Creek in the Gallatin National Forest. (Individual, Livingston, MT - #A6409.45621)	Gallatin	MT
The Montana side of Yellowstone. (Individual, Boulder, CO - #A9968.50000)	Gallatin	MT
Near Gallatin National Forest roadless areas. . . . The Crazy Mountains. (Individual, Gallatin Gateway, MT - #A19100.45622)	Gallatin	MT
The Gallatin-Yellowstone Divide Trail in the Gallatin N.F. (Individual, Madison, WI - #A866.91221)	Gallatin	MT
Gallatin Range . . . Wyoming & Montana. (Individual, Middlebury, VT - #A10033.45621)	Gallatin	MT, WY
The Shoshone and Gallatin National Forests. (Individual, Gardiner, MT - #A27498.45621)	Gallatin, Shoshone	MT, WY
Glacier Parks. (Individual, Littleton, CO - #A9935.45331)	Glacier National Park	MT
The Elkhorns, Big Belts, Continental Divide, and Rocky Mountain Front . . . the Helena National Forest. (Christian Kaufman, Representative, Helena, MT - #A30149.45621)	Helena	MT
The Ten Mile watershed on the Helena National Forest . . . from roadless tracts east of the Continental Divide in the Black Mountain Roadless Areas. (Christine Kaufman, Representative, Montana House of Representatives, Helena, MT - #A30149.45622)	Helena	MT
The Blackfoot Meadows and Avalanche Gulch to US 12 portions of the Helena NF. (Individual, Helena, MT - #A30941.10150)	Helena	MT
Roadless areas on the Idaho Panhandle National Forest. (Conservation/Preservation Organization, Couer d'Alene, ID - #A5697.90110)	Idaho Panhandle	ID, MT, WA
Idaho Panhandle National Forest. . . . timber sale (the Myrtle Cascade). (Conservation/Preservation Organization, Spokane, WA - #A18013.90520)	Idaho Panhandle	ID, MT, WA
The St. Joe R. D. of the Idaho Panhandle forest. (Individual, Saint Maries, ID - #A15516.45621)	Idaho Panhandle	ID, MT, WA
Lake Pend Oreille area . . . of the Northern Idaho Panhandle forest. (Individual, Sandpoint, ID - #A28585.90421)	Idaho Panhandle	ID, MT, WA
The Yaak, MT, watershed (a Kootenai tributary). (Individual, Troy, MT - #A13457.45624)	Kootenai	ID, MT
Roadless areas in the Kootenai National Forest in Western Montana. (Individual, Trout Creek, MT - #A10498.45622)	Kootenai	ID, MT
Montana's Yaak valley, in the northern half of the Kootenai National Forest. (Conservation/Preservation Organization, Missoula, MT - #A17234.45621)	Kootenai	ID, MT
The Ten Lakes Proposed Wilderness Area. . . . The areas surrounding the Cabinet Mountain Wilderness Area and the Bob Marshall Wilderness Complex. (Individual, Libby, MT - #A8346.45621)	Kootenai	ID, MT
In Montana's Rocky Mountain Front, on the inventoried roadless areas of the Lewis and Clark National Forest, Rocky Mountain Division, which is known to Montanans as the fabulous, wild Rocky Mountain Front. (Individual, Choteau, MT - #A5653.45621)	Lewis and Clark	MT
The Snowy Mts. Wilderness Study Area, Bitter Cr., Woodhawk. (Individual, Lewistown, MT - #A15660.45629)	Lewis and Clark	MT
Little Missouri National Grasslands. . . . The Theodore Roosevelt National	Little Missouri	ND

<p>Park’s South Unit, located within the boundaries of the Grasslands, is bordered by the Teddy Roosevelt Oil Field. The Park’s North Unit is similarly at risk. . . . Bell Lake and Wannagan Roadless Areas. . . . Dawson’s Waterhole Roadless Area’s east side. . . . Kinley Plateau and Bullion Butte, roadless areas the Dakota Prairie Grasslands Office deems unsuitable for Wilderness. Lone Butte and Bennett-Cottonwood Roadless Areas. (Conservation/Preservation Organization, Bismarck, ND - #A19108.45620)</p>	<p>National Grasslands, Theodore Roosevelt National Park</p>	
<p><u>Nez Perce National Forest</u>  <u>River of No Return/Gospel Hump Additions.</u> These roadless areas are contiguous to the River of No Return and Gospel Hump Wilderness Areas (areas that are contiguous) and make logical additions. . . . Furthermore, the closure of the unneeded Magtruder Road would unite this largest wildland in the lower 48 with the Selway-Bitterroot and surrounding wildlands.  <u>Cove and Mallard—1921 and 1847.</u> . . . Cove/Mallard timber sales. . . . four sales went forth and road reclamation should take place on the Noble, Jack, Grouse and Small sales roads. . . . part of the Salmon River country. (Conservation/Preservation Organization, Moscow, ID - #A22654.53110)   <u>Gospel Hump Additions</u> This is the site of the Wing Creek/Twentymile Roadless Area (south Fork Clearwater drainage) . . . Tenmile and Johns Creeks. Other key additions 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). . . .  <u>Selway-Bitterroot Additions</u>                  These are all logical additions to the Selway Bitterroot Wilderness. A portion of Meadow Creek was previously included in the old Selway Primitive Area. (Conservation/Preservation Organization, Moscow, ID - #A22654.45400)  <u>Meadow Creek-1845.</u> . . . Meadow Creek is the major tributary to the Selway River.  <u>Rackcliff-Gedney—1841</u> (also Clearwater National Forest) This large area occupies the divide between the Lochsa and Selway Rivers. (Conservation/Preservation Organization, Moscow, ID - #A22654.45100)  <u>Upper Bear Creek.</u> . . . the headwaters of Bear Creek, contiguous to the Selway Bitterroot Wilderness and at the top of Lost Horse Canyon. (Conservation/Preservation Organization, Moscow, ID - #A22654.25200)   <u>South Fork Clearwater</u>  <u>Dixie Summit/Nut Hill—1235.</u>  <u>Lick Point—1227.</u> This is the headwater of the American River.                  Selway-Middle Fork Clearwater                  These roadless areas drain into the Selway and Middle Fork Clearwater.  <u>O’Hara Falls—1226.</u> O’Hara Creek.  <u>Goddard Creek—1843.</u> . . . between O’Hara Falls and Middle Fork Face.  <u>Middle Fork Face—1842.</u> . . . The Middle Fork sale . . . in the Horse Creek watershed.  <u>Lower Salmon</u>                  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. (Conservation/Preservation Organization, Moscow, ID - #A22654.90310)  <u>Clear Creek—1844.</u>  <u>North Fork Slate—1850.</u> Slate Creek  <u>Little Slate—1851.</u> . . . tributaries to Slate Creek . . . A unique lake in Nut Basin and an RNA in No Business Creek.  <u>John Day—1852.</u> . . . John Day and Allison Creeks.  <u>Kelly Mountain—1857.</u> This area drains into the Salmon east of Riggins.</p>	<p>Nez Perce</p>	<p>ID</p>

(Conservation/Preservation Organization, Moscow, ID - #A22654.45100)		
Cove/Mallard, Selkirk Mountain Roadless Area, South Fork Mountain Area, Quartzite Roadless Area. . . . roadless areas, such as Cove/Mallard in the Nez Perce National Forest in central Idaho. . . . the Myrtle-Cascade Project just west of Bonners Ferry . . . the Selkirk Roadless Area! (Conservation/Preservation Organization, Spokane, WA - #A2840.45614)	Nez Perce	ID
Roadless lands in Yellowstone Nat'l Park. (Individual, Southampton, PA - #A10089.45620)	Yellowstone National Park	WY
The areas in the National Grasslands need to be protected. . . . (Individual, Center, ND - #A6904.45621)	Multiple	ND

**Region 2 Rocky Mountain**

Area	National Forest or Grassland	State
Colorado's roadless areas. (Individual, Coal Creek, CO - #A15770.50000)	Multiple	CO
Colorado's wild forest. (Individual, Boulder, CO - #A21023.45620)	Multiple	CO
The Colorado Plateau and Southwest. (Individual, Burke, VA - #A30052.90130)	Multiple	CO
4.4 million acres in Colorado. (Business, Crested Butte, CO - #A31274.45300)	Multiple	CO
Southwest Colorado...San Juan County, Colorado. (Peter McKay, Commissioner, San Juan County Board of Commissioners, Silverton, CO - #A8590.10150)	Multiple	CO
The Bighorns, Medicine Bows and Wind River Mountains. (Individual, Casper, WY - #A21035.10111)	Multiple	CO, WY
The Continental Divide Trail. (Individual, Helena, MT - #A7359.45621)	Multiple	CO, WY
Wyoming. (Individual, Sheridan, WY - #A12145.10150)	Multiple	WY
Wyoming's national forest lands. (Individual, Cheyenne, WY - #A15034.10150)	Multiple	WY
The West, especially the Colorado Plateau. (Individual, Burke, VA - #A30052.90130)	Multiple	Multiple
The Rocky Mountains. (Individual, Rindge, NH - #A4812.90130)	Multiple	Multiple
The Southern Rockies. (Conservation/Preservation Organization, Boulder, CO - #A22130.90130)	Multiple	Multiple
Colorado—the Canyonlakes Ranger District of the Roosevelt National Forest. (Individual, Fort Collins, CO - #A21116.10111)	Arapaho-Roosevelt	CO
In the Front Range . . . the James Peak Area. (Individual, No Address - #A23544.45621)	Arapaho-Roosevelt	CO
The City of Boulder has a great interest in the protection of roadless areas in the Arapahoe and Roosevelt National Forests. . . . In Colorado . . . more than 4.4 million acres. (William R. Toor, Mayor, City of Boulder, Boulder, CO - #A21473. 45622)	Arapaho-Roosevelt	CO
Please, please, please protect all of our roadless areas in all of our national forests. Including the Arapaho-Roosevelt, my next door neighbor. (Individual, Boulder, CO - #A20728.45620)	Arapaho-Roosevelt	CO
Roadless areas on the Grand Mesa National Forest—the Salt Creek and Priest Mountain roadless areas. Moreover, three forests in Colorado—the Routt, Rio Grande, and Arapaho Roosevelt National Forests—as well as the Black Hills National Forest in South Dakota and Wyoming . . . Bushy Creek, Morrison Creek, and South Fork roadless areas on the Routt and the Beaver Park roadless area in the Black Hills. (Conservation/Preservation Organization, Missoula, MT - #A17234.45622)	Arapaho-Roosevelt, Black Hills, Grand Mesa, Medicine Bow-Routt, Rio Grande	CO, SD, WY
Bushy Creek and Morrison Creek (Morrison Creek Timber Sale—Routt National Forest); Salt Creek and Priest Creek (Sheep Flats Timber Sales, Grand Mesa-	Arapaho-Roosevelt, Grand Mesa-Uncompahgre-	CO, WY

Uncompahgre-Gunnison National Forest); Gunbarrel, Rampart and Thunder Butte (Upper South Platte Project, Pike-San Isabel National Forest); Nipple Peak North Roadless Areas and possibly others (Routt Bark Beetle Project, Routt National Forest); Cherokee Park (Sheep Creek Timber Sale, Arapaho-Roosevelt National Forest); Dome Peak (Dome Peak Timber Sale, White River National Forest); and HD Mountains (coalbed methane production, San Juan National Forest). (Conservation/Preservation Organization, Denver, CO - #A12008.45624)	Gunnison, Medicine Bow-Routt, Pike-San Isabel, San Juan, White River	
Grand County. (Individual, Watkins, CO - #A100.45400)	Arapaho-Roosevelt, Medicine Bow-Routt	CO, WY
WY's roadless areas. . . . the Bighorn Mtns. . . . the Rock Creek, Littlehorn Canyon and Devils playground areas. . . . Rock Creek and Buffalo Creek in the Med Bow area. (Individual, Sheridan, WY - #A16801.45620)	Big Horn, Medicine Bow-Routt	WY
Roadless areas in Wyoming . . . the deep canyon lands of the Rock Creek and Littlehorn Roadless Areas in the Bighorns . . . the Mt. Leidy Highlands and Wyoming Range Roadless Areas in the Bridger-Teton . . . forests of Rock Creek and Buffalo Peak Roadless Areas in the Medicine Bows . . . mountains of Deep Lake/Beartooth Plateau and Franc's Peak Roadless Areas in the Shoshone National Forest. (Individual, Jackson, WY - #A28333.45621)	Bighorn, Bridger-Teton, Medicine Bow-Routt, Shoshone	WY
Wyoming forests (Medicine Bow and Bighorn) . . . The Bridger-Teton and Shoshone National Forests. (Conservation/Preservation Organization, Sheridan, WY - #A17593.45622)	Bighorn, Bridger-Teton, Medicine Bow-Routt, Shoshone	WY, CO
Roadless Areas in the Shoshone, Big Horn and Medicine Bow National Forests. (Individual, Pinedale, WY - #A5307.45622)	Big Horn, Medicine Bow-Routt, Shoshone	CO, WY
The Shoshone National Forest and Bighorn National Forest roadless areas. (Conservation/Preservation Organization, Sheridan, WY - #A17593.45622)	Bighorn and Shoshone	WY
The Brent Creek area in Duboise. (Individual, Casper, WY - #A21049.45622)	Bridger-Teton Shoshone	WY
Custer and Shoshone National Forests. (Individual, Red Lodge, MT - #A5778.10150)	Custer, Shoshone	MT, SD, WY
Gunnison National Forest. (Conservation/Preservation Organization, Crested Butte, CO - #A21706.91221)	Grand Mesa-Uncompahgre-Gunnison	CO
The North Fork Valley. (Conservation/Preservation Organization, Paonia, CO - #A20478.90130)	Grand Mesa-Uncompahgre-Gunnison	CO
The Uncompahgre, HD Mountains 25 miles east of Durango and an area close to Fort Collins need to remain protected as Roadless Areas. (Individual, Aurora, CO - #A21657.45621)	Grand Mesa-Uncompahgre-Gunnison	CO
Troublesome Roadless Area (Routt NF). . . . San Juan National Forest. . . . Salt Creek and Priest Mountain Roadless Areas (GMUG NF). (Individual, Boulder, CO - #A21450.45624)	Grand Mesa-Uncompahgre-Gunnison, Medicine Bow-Routt, San Juan	CO, WY
15 million acres in Colorado, of which more than 4.4 million acres are roadless. In Wyoming, national forests cover about 9.3 million acres, including 3.5 million acres of roadless lands. These roadless lands include such special places as the Dome Peak and Basalt Mountain Roadless Areas on the White River NF, the Salt Creek and Priest Mountain Roadless Areas on the Grand Mesa NF, the Turkey Creek Roadless Area on the San Juan NF, and Coon Creek on the Medicine Bow NF. (Conservation/Preservation Organization, Denver, CO - #A21367.45100)	Grand Mesa-Uncompahgre-Gunnison, Medicine Bow-Routt, San Juan, White River	CO, WY
National Forest roadless areas in the Southern Rockies . . .	Grand Mesa-	CO,

<p>Below is a partial list of pending threats to roadless areas in Colorado and southern Wyoming—these pending agency projects could move forward immediately, although they would be prohibited in their current form under the Roadless Rule:                  Sheep Flats Timber Sale would damage parts of the Salt Creek and Priest Mountain Roadless Areas - two of the three remaining roadless areas on the Grand Mesa National Forest.                  Jackson Mountain Timber Sale on the San Juan National Forest                  Trout Mountain Timber Sale on the Rio Grande National Forest                  Morrison Creek Timber Sale on the Routt National Forest                  On the White River National Forest, the proposed Dome Peak and South Quartzite timber sales both include some logging in roadless areas.                  The Upper Blue Stewardship Project on the White River NF would degrade the Ten Mile Roadless Area. . . .                  Oil and gas leasing and development would invade the HD Mountains Roadless Area on the San Juan National Forest.                  The West Elk Roadless Area and the Springhouse Park Roadless Area on the Gunnison National Forest. . . .                  A proposed timber sale on Basalt Mountain on the White River NF would damage the Basalt Mountain Roadless Area;                  The Upper South Platte Project on the Pike-San Isabel NF could damage parts of four inventoried roadless areas—the Gunbarrel, Green Mountain, Thunder Mountain, and Rampart Roadless Areas.                  On the Medicine-Bow National Forest in Wyoming, the Cold Springs Timber Sale proposed in 1998 would log 5.4 million board feet, including logging on more than 1,000 acres, in two RARE II areas—the Buffalo Peak and Deer Creek Roadless Areas. (Conservation/Preservation Organization, Denver, CO - #A21367.12440)</p>	<p>Uncompahgre-Gunnison, Medicine Bow-Routt, Rio Grande, San Juan, White River</p>	<p>WY</p>
<p>Areas of local concern that I would like to see remain roadless include the ED Mountains on the San Juan National Forest and all roadless areas on the White River and Grand Mesa National Forests. (Individual, Littleton, CO - #A29784.45620)</p>	<p>Grand Mesa-Uncompahgre-Gunnison, San Juan, White River</p>	<p>CO</p>
<p><u>Rock Creek Roadless Area (Medicine NF)</u>. . . . Rock Creek Roadless Area on the Medicine Bow National Forest (NF). (Individual, Boulder, CO - #A21450.45621)</p>	<p>Medicine Bow-Routt</p>	<p>CO, WY</p>
<p>On the Medicine Bow National Forest, roadless areas . . . Libby Creek and French Creek...the Snowy Range Roadless Area. . . . the Big and Little Sandstone, Huston Park Additions, and Solomon Creek roadless areas. . . . The Middle Fork and Rock Creek roadless areas. (Conservation/Preservation Organization, Laramie, WY - #A20904.45100)</p>	<p>Medicine Bow-Routt</p>	<p>CO, WY</p>
<p>Routt/Medicine Bow National Forest. . . .                  I am asking that you protect completely the remaining roadless areas in that forest, as well as in all national forests. (Individual, No Address - #A22378.10150)</p>	<p>Medicine Bow-Routt</p>	<p>CO, WY</p>
<p>Roadless areas on the Medicine Bow National Forest. The Tie Camp Timber Sale, Jack Creek Timber Sale and Cold Springs Timber Sale would seriously impact roadless areas on the Medicine Bow National Forest if allowed to go forward. (Conservation/Preservation Organization, Laramie, WY - #A20904.30100)</p>	<p>Medicine Bow-Routt</p>	<p>CO, WY</p>
<p>The area east of Ptarmigan Peak Wilderness. (Individual, Silverthorne, CO - #A28101.45624)</p>	<p>Medicine Bow-Routt, White River</p>	<p>CO</p>
<p>Roadless areas on the Pike National Forests. . . . The eastern edges of the Pike are important refuges for increased metropolitan development. Further, Audubon’s new Nature Center is located at the very edge of the Pike forest were the S. Platte River leave the mountain valleys to continue its journey across</p>	<p>Pike-San Isabel</p>	<p>CO</p>

Colorado's eastern plains. (Conservation/Preservation Organization, Littleton, CO - #A8829.45622)		
The Roadless Area Conservation Rule would protect 5.2 million acres across the Southern Rockies and 669,000 acres in the Pike and San Isabel National Forests. (Conservation/Preservation Organization, Denver, CO - #A8824.45622)	Pike-San Isabel	CO
The San Isabel National Forest. . . . in the Wet Mountains. (Individual, Wetmore, CO - #A13477.45622)	Pike-San Isabel	CO
This summer I had the opportunity to map two areas of Colorado for possible roadless/wilderness inventory. One area, East of Twin Lakes, includes a large roadless area that is pristine, home to much wildlife, is used by hikers, runners, and backpackers, has two major Colorado trails and is in need of protection. (Individual, Evergreen, CO - #A17159.70400)	Pike-San Isabel	CO
The Pike-San Isabel National Forest. . . . the Kreutzer-Princeton Roadless Area. (Individual, Colorado Springs, CO - #A25621.45622)	Pike-San Isabel	CO
This regards <b>Gray Back Peak, a roadless area on the Pike-San Isabel National Forest which has consistently been overlooked in roadless inventory.</b> This area should be included under the Roadless Conservation Rule when the current revision is finalized. . . . This tract is in the upper watersheds of Little Fountain Creek and Rock Creek, centered on Gray Back Peak, near Colorado Springs on the Pikes Peak Ranger District. . . . this tract is adjacent to the BLM's Beaver Creek Wilderness Study Area. . . . <b>(We again urge the U.S. Forest Service to inventory and include this area in the Roadless Area Conservation Rule.)</b> (Conservation/Preservation Organization, Monument, CO - #A20695.45624)	Pike-San Isabel	CO
The lands the Rule protects are an excellent buffer to the Weminuche Wilderness area in our county. (Christine K. Smith, Chairperson, San Juan County Board of Commissioners, Silverton, CO - #A8596.45621)	Rio Grande, San Juan	CO
The Hermosa roadless area in southwest Colorado, 10 miles north of Durango . . . the Hermosa Creek Drainage. (Recreational Non-Motorized Organization, Boulder, CO - #A17233.45621)	San Juan	CO
The Hermosa Creek area—the largest unprotected roadless area in the San Juans. (Individual, Boulder, CO - #A3501.45100)	San Juan	CO
The San Juan Mountain Range in Hermosa. (Individual, Boulder, CO - #A3489.45621)	San Juan	CO
Several National Forest roadless areas are adjacent to the City of Durango or located nearby. These roadless areas on the San Juan National Forest provide some of the most cherished backcountry recreation opportunities for Durango city residents and visitors. Junction Creek is one such roadless area. The Colorado Trail begins at Junction Creek and offers popular hiking, mountain bicycling, and cross-country skiing trips for locals and tourists. Junction Creek comprises a portion of the Hermosa Roadless Area. The Haflin Creek and Missionary Ridge Trails are other popular trails just a few miles outside the Durango city limits. These trails are located in a roadless area adjacent to the Weminuche Wilderness Area. The Roadless Area Conservation Rule as originally published would maintain these undeveloped, roadless national forest lands in their present condition and perpetuate the roadless, backcountry settings cherished by our city's residents. (Virginia Castro, Council Member, City of Durango, Durango, CO - #A8598.45624)	San Juan	CO
The San Juan and White River National Forests. (Individual, Broomfield, CO - #A6301.90110)	San Juan, White River	CO
White River NF. (Individual, Aurora, IL - #A916045620)	White River	CO
The forests of Basalt and Table Mountain on the White River National Forest. (Individual, Aspen, CO - #A5116.50000)	White River	CO
Over 600,000 roadless acres in the White River National Forest . . . including	White River	CO

Dome Peak, Big Ridge, and Red Table Mountain. . . Big Ridge to South Fork Roadless Area, adjacent to Flat Tops Wilderness Area in northwestern Colorado. . . Basalt Mountain, Red Table Mountain, and Gypsum Creek Roadless Area encompass the largest unprotected wild area on the White River National Forest covering 78,500 acres. . . The Red Table area. (Conservation/Preservation Organization, Denver, CO - #A17162.45621)		
Dome Peak and Two Elk roadless areas in the White River National Forest. (Conservation/Preservation Organization, Nevada City, CA - #A4941.90110)	White River	CO
Dome Peak Roadless Area...the Flat Tops Wilderness...roadless areas on the White River NF. (Individual, Boulder, CO - #A21450.45621)	White River	CO
Beaver Creek, Breckenridge and Vail in Colorado, (Individual, Alta, WY - #A19643.90820)	White River	CO
The Frind Range Roadless Area. (Individual, Colorado Springs, CO - #A22145.45621)	Unknown	CO

**Region 3 Southwestern**

Area	National Forest or Grassland	State
Areas of the West, such as Arizona. (Individual, Bloomsburg, PA - #A15515.45621)	Multiple	AZ
160,000 roadless acres in the Greater Grand Canyon region. (Conservation/Preservation Organization, Flagstaff, AZ - #A21368.45621)	Multiple	AZ
1.2 million acres of forest in Arizona and 1.3 million acres in New Mexico. (Individual, Tucson, AZ - #A6021.10150)	Multiple	AZ, NM
The west especially . . . Southwest. (Individual, Burke, VA - #A30052.90130)	Multiple	AZ, NM
In New Mexico . . . nearly 1.6 million acres of inventoried roadless acres in need of protection. (Individual, Santa Fe, NM - #A19211.90110)	Multiple	NM
The Continental Divide Trail. (Individual, Helena, MT - #A7359.45621)	Multiple	NM
In the Apache-Sitgreaves National Forest in the White Mountains of Arizona. (Individual, Sonoita, AZ - #A22274.45621)	Apache-Sitgreaves	AZ
Cibola National Forest in central New Mexico. (Individual, No Address - #A5287.70000)	Cibola	NM
Santa Fe NF. (Individual, Aurora, IL - #A916045620)	Santa Fe	NM
On the Santa Fe National Forest, inventoried roadless areas border the Pecos and Dome Wilderness areas and significant portions of the Jemez Mountains contain roadless areas. (Individual, Santa Fe, NM - #A19211.45611)	Santa Fe	NM
Phoenix, Arizona, near the Tonto National Forests. A favorite hiking area in the forest is near the Mazatzal Wilderness northeast of Phoenix. It is a beautiful, yet rugged part of Arizona. Southeast of the small village of Sunflower, Forest Road 22 links several trails in the Mazatzal Wilderness to the Four Peak Wilderness. (Individual, Phoenix, AZ - #A15726.90130)	Tonto	AZ

**Region 4 Intermountain**

Area	National Forest or Grassland	State
Our state of California. . . San Luis Obispo County itself has roadless and wilderness areas which must be protected. (Conservation/Preservation Organization, San Luis Obispo, CA - #A31202.45621)	Multiple	CA
All Roadless national forest land in California and the Pacific Northwest. (Individual, Westminster, SC - #A9412.45620)	Multiple	CA, OR, WA
Colorado. (Individual, Lebanon, NH - #A4286.90110)	Multiple	CO
The Northern Rockies. (Individual, No Address - #A928.70300)	Multiple	CO, ID, MT,

		WY
Idaho's wild forests. (Individual, La Canada Flintridge, CA - #A803.90110)	Multiple	ID
Idaho's remaining 8 million acres of wild lands. (Business, Boise, ID - #A20362.10150)	Multiple	ID
Idaho. (Conservation/Preservation Organization, Williams, OR - #A21210.45500)	Multiple	ID
The proposed roadless areas in Idaho (Boulder/White Clouds, S. Fork of the Salmon River, S. Fork of the Snake, etc.). (Individual, No Address - #A27595.90110)	Multiple	ID
I live in Idaho . . . I want to see all 9 million of those acres protected by the roadless rule. . . . including the Boulder-White Clouds, the Pahsimeroi, the Pioneer Mountains, the Smokey Mountains, The Lost River Range. (Individual, Stanley, ID - #A16269.45620)	Multiple	ID
All roadless areas including those encompassed in the Northern Rockies Ecosystem Protection Act to and including, one thousands acres in size should be protected to preserve their wilderness character and eligibility for congressional Wilderness designation, rather than being deferred later to the forest planning process. (Individual, Emhurst, IL - #A15290.45320)	Multiple	ID
Proposed roadless areas in Idaho (Boulder/White Clouds, S. Fork of the Salmon River, S. Fork of the Snake, etc.) (Individual, No Address - #A27595.90110)	Multiple	ID
Places like Cove/Mallard, the Lost River Range, the Boulder-White Clouds, Mallard Larkins, Meadow Creek, Kelly Creek, South Fork Snake, Deadwood River, St. Joe River and Long Canyon, to just mention a few wild Idaho places. . . . (Individual, Boise, ID - #A20071.45100)	Multiple	ID
Areas of Montana, Idaho, and Washington, such as the Gallatin Range, the Big Belts, the Whitetail-Haystack-O'Neill roadless area, the White Sand and Cove-Mallard roadless areas, and the Kettle Range. (Conservation/Preservation Organization, Bozeman, MT - #A20601.45621)	Multiple	ID, MT, WA
The Clearwater, Nez Perce, Idaho Panhandle, Targhee, Boise, and Payette. (Conservation/Preservation Organization, Nevada City, CA - #A4941.45621)	Multiple	ID, MT, WA, WY
The Greater Yellowstone area. (Individual, Santa Monica, CA - #A9909.45331)	Multiple	ID, MT, WY
6 million acres in Greater Yellowstone. (Individual, Bozeman, MT - #A661.50510)	Multiple	ID, MT, WY
Utah, Wyoming, Nevada . . . Bridger-Teton near Grand Teton National Park. . . . The Red Canyon area in Dixie near Bryce Canyon National Park. (Individual, East Greenbush, NY - #A8821.90110)	Multiple	NV, UT, WY
Roadless areas in Utah. (Individual, Salt Lake City, UT - #A4857.90110)	Multiple	UT
Utah. (Individual, Lebanon, NH - #A4286.90110)	Multiple	UT
Wyoming. (Individual, Sheridan, WY - #A12145.10150)	Multiple	WY
Wyoming's national forest lands. (Individual, Cheyenne, WY - #A15034.10150)	Multiple	WY
Wyoming wildlands. (Individual, Gillette, WY - #A12084.50000)	Multiple	WY
Commissary Ridge is not only the far southwestern corner of the Greater Yellowstone Ecosystem, but it is also one of the most crucial links between the Greater Yellowstone Ecosystem and the Uinta Range in Utah and the southern Rockies in Colorado. . . . Public lands within the Greater Yellowstone Ecosystem including the 170,000 roadless acres of Commissary Ridge. (Individual, Salt Lake City, UT - #A2369.53110)	Multiple	WY, UT
Pristine forests of the Inter-mountain west. (Individual, Sequim, WA - #A4527.45620)	Multiple	Multiple
The Yellowstone/Teton area . . . the Gallatin, Yellowstone and Madison Rivers. (Individual, San Antonia, TX - #A10116.45620)	Multiple	Multiple
The Snake and Yellowstone Rivers. (Individual, Gladwyne, PA -	Multiple	Multiple

#A10116.45620)		
I would like to see the Roadless Area Rule apply to <u>ALL</u> national forests (New England, Eastern, Midwest, Western, Alaskan Tongass, and other Alaskan forests etc.) (Individual, Endeavor, WI - #A8231.45622)	Multiple	Multiple
The Ashley and Fish Lake National Forests. (Individual, Kearns, UT - #A7590.65280)	Ashley, Fish Lake	UT
The Uintas. (Individual, Dutch John, UT - #A13402.45621)	Ashley, Uinta, Wasatch-Cache	UT
Roadless areas in Wyoming . . . lands such as the deep canyon lands of the Rock Creek and Littlehorn Roadless Areas in the Bighorns . . . the Mt. Leidy Highlands and Wyoming Range Roadless Areas in the Bridger-Teton . . . forests of Rock Creek and Buffalo Peak Roadless Areas in the Medicine Bows . . . mountains of Deep Lake/Beartooth Plateau and Franc’s Peak Roadless Areas in the Shoshone National Forest. (Individual, Jackson, WY - #A28333.45621)	Bighorn, Bridger-Teton, Medicine Bow-Routt, Shoshone	WY
Boise National Forest, primarily along the north, middle and south forks of the Boise River. . . the Sawtooth and Trinity mountain ranges, which are located in the same general vicinity. (Individual, Phoenix, AZ - #A15726.90130)	Boise	ID
The Smokys are 347,880 acres, immediately south of the Sawtooths. They’re from 5,000 [feet] in elevation by the South Fork of the Boise River to 10,000 feet beside “Big Peak”. . . the South Fork of the Boise. (Individual, Boise, ID - #A213693.45100)	Boise	ID
Idaho’s . . . in roadless areas, like Deadwood river and Middle Fork Payette River. (Individual, Boise, ID - #A6970.50000)	Boise	ID
Targhee, Boise, and Payette National Forests. (Conservation/Preservation Organization, Missoula, MT - #A17234.45622)	Boise, Payette, Targhee	ID, WY
Roadless areas such as the Deadwood River, Lime Creek, Snowbank Mountain, and Trinity Mountains are easily accessible from Boise. (Business, Boise, ID - #A20362.45624)	Boise, Sawtooth	ID
The Boise National Forest and the Sawtooth National Forest. (Individual, Boise, ID - #A21215.45621)	Boise, Sawtooth	ID
Bridger-Teton National Forest. (Individual, South Lake Tahoe, CA - #A5108.90720)	Bridger-Teton	WY
Bondurant, WY adjacent to the Gros Ventre Wilderness Area. (Individual, Bondurant, WY - #A15081.45620)	Bridger-Teton	WY
The Mt. Leidy Highlands and Wyoming Range Roadless Areas in the Bridger-Tetons. (Individual, Jeffrey City, WY - #A27115.45100)	Bridger-Teton	WY
The Wyoming Range roadless area in the Bridger-Teton National Forest. (Conservation/Preservation Organization, Sheridan, WY - #A17593.45330)	Bridger-Teton	WY
On the south side of the same roadless area, at the headwaters of Devil’s Hole Creek. . . I’ve hiked along the ridge overlooking Devil’s Hole Creek from the south. The panorama north to Electric Peak and the Salt River Range is superlative. . . Commissary Ridge. (Individual, Salt Lake City, UT - #A2369.50000)	Bridger-Teton	WY
The Brent Creek area in Duboise. (Individual, Casper, WY - #A21049.45622)	Bridger-Teton, Shoshone	WY
Tippets Valley, an IRA, on the Cedar District . . . The Dixie (Individual, Las Vegas, NV - #A5694.45622)	Dixie	UT
The Targhee National Forest . . . Boulder Mountain on the Dixie National Forest in Utah is a 150,000+ acre uninventoried roadless area. Areas adjacent to Boulder Mountain comprise 60,000-80,000 acres of roadless lands that were not included in the Dixie inventory. All these areas should receive immediate protection and should not have to wait for the forest planning process. In a 1999 citizens’ inventory of the Manti-La Sal National Forest in Utah, 30	Dixie, Manti-La Sal, Targhee, Uinta	ID, UT

percent more roadless areas were found in the La Sal mountains and 50 percent more were found in the Abajos than what is currently in the Forest Service's inventories. In a 1998 citizens' inventory of the Uinta National Forest 123,500 more acres of roadless lands were found than the Uinta's own 1999 inventory. These areas also deserve immediate protection. (Conservation/Preservation Organization, Missoula, MT - #A21359.45622)		
Fishlake National Forest and Manti-LaSal National Forest. (Individual, Apo, NY - #A27804.45622)	Fishlake, Manti-La Sal	UT
Boulder Mountain, Thousand Lake Mountain, Cascade Peak, Pump Ridge, Hammond Canyon and the LaSal High Peaks are just some of the magnificent and unprotected Forest Service roadless lands in Utah. (Individual, Salt Lake City, UT - #A2369.10150)	Fishlake, Manti-La Sal	UT
Gallatin Range . . . Wyoming and Montana. (Individual, Middlebury, VT - #A10033.45621)	Gallatin	MT, WY
The Spring Mountains in Nevada, which are part of the Toiyabe National Forest. (Individual, Henderson, NV - #A4904.45622)	Humboldt-Toiyabe	NV
The Humboldt-Toiyabe National Forest in Nevada . . . in the west part of the Grant Range and Clement Mountains. All of the roadless areas in the Schell Creek range. (Conservation/Preservation Organization, Missoula, MT - #A17234.45622)	Humboldt-Toiyabe	NV
Roadless areas on the Humboldt-Toiyabe National Forest in Nevada. . . These include: Arc Dome south, the Toiyabe crest, Bunker Hill, Georges Canyon, land directly adjacent to the Alta Toquima Wilderness, and Mahala Creek in the Independence Range. (Conservation/Preservation Organization, Nevada City, CA - #A4941.90720)	Humboldt-Toiyabe	NV
Inventoried Roadless Areas in Utah. . . roadless areas in the Moab and Monticello Ranger Districts in the Manti-La Sal National Forest . . . the Wasatch-Cache NF. (Conservation/Preservation Organization, Moab, UT - #A30528.45622)	Manti-La Sal, Wasatch-Cache	UT
Two logging projects, the North Valley and Fourmile timber sales, on the Payette National Forest threaten roadless areas in Idaho. The North Valley Sale, 10 miles northwest of New Meadows on the New Meadows Ranger District, calls for logging 8.8 mmbf and 3.1 miles of roads. Several of the cutting units are in the Rapid River roadless area, one of the areas set aside for tradeoff for dams near Hell's Canyon. The Fourmile Sale, five miles northeast of New Meadows in the New Meadows Ranger District, will log 637 acres and build eight miles of roads. Part of the sale is the Patrick Butte roadless area, and 80,000-acre roadless area that hugs close to the Salmon River and comes up to the high, mountainous country above. The sale area is critical for the migration of elk, moose, and bear. Other roadless areas in Idaho are at risk South Fork Snake, Deadwood River, St. Joe River, Long Canyon, and the greater Cove/Mallard-Jersey-Wing/Ten Mile area on the Nez Perce National Forest. (Individual, Boise, ID - #A20396.45621)	Payette	ID
Specifically the French Creek, Patrick Butte, Needles, Secech, Rapid River, Council Mountain, and Cuddy Mountain roadless areas need to be conserved in their entirety. . . . All the way from the desert-like canyon bottoms of Hells Canyon and the main Salmon River canyon to the alpine regions of Cuddy Mountain and Bear Pete. (Individual, Weiser, ID - #A15804.45624)	Payette	ID
French Creek and Patrick Butte Roadless areas. . . Elkhorn Creek areas . . . Lake and Partridge Creeks are the most pristine drainages aside from French Creek, and all three should remain roadless in perpetuity. The boundary should be extended to include the BLM property to the Salmon River. Hazard Creek and Hard Creek should be protected . . . Granite Mountain, at the south end of Patrick Butte, is threatened by a ski area and further random skiing but should remain roadless at least through the next planning period. The boundary of the roadless area is adequate up past Grassey Lakes and by Scribner Lake, Lave	Payette	ID

Butte, and Hershey Point. Beyond that point the boundary in the hydrogeologic boundary of Partridge Creek. In the French Creek drainage the roadless areas boundaries should follow Little French Creek as close as possible, skirting clearcuts and the road down to include the BLM property. From there the boundary following the French Creek road up to Burgdorf property. From there the boundary following the French Creek road on up to Burgdorf then to Nethger and Josephine lakes and Cloochman Saddle, following the paved road to near Copet Creek, missing Granite Reservoir and Fisher Creek Saddle then dipping south again to past Slab Butte and following along Brundage Mountain Road to near Hard Creek Lake and Upper Hazard Lake and back to Little French Creek. The clearcuts along Little French and French Creeks should be managed to favor habitat management. The utmost concern should be taken to include the hydrogeologic boundary of French Creek, especially along Klip Creek, where no timber management should be undertaken. The Slab Butte, Bruin Mountain, and Little French Creek country should not be managed for recreation, timber, or sheep, but rather for their plants and alpine habitat; it is fragile and in some cases burned. (Individual, Boise, ID - #A21369.45624)		
The Sawtooth Valley between the Sawtooth and White Cloud mountains. (Individual, Kittery, ME - #A21218.45621)	Sawtooth	ID
The Smokys are 347,800 acres, immediately south of the Sawtooths. They're from 5,000 in elevation by the South Fork of the Boise River to 10,000 feet beside "Big Peak". (Individual, Boise, ID - #A20514.45621)	Sawtooth	ID
Lake Tahoe. (Individual, Carmelien Bay, CA - #A1278.45621)	Tahoe	CA, NV
Roadless areas in the Sierra Nevada. . . . For example, the Tahoe National Forest . . . Devils Canyon . . . Lafayette Ridge . . . an area near Downieville and north of New York Ravine. (Individual, Oklahoma City, OK - #A17236.45621)	Tahoe	CA, NV
Targhee. (Individual, Hailey, ID - #A17172.10150)	Targhee	ID, WY
Island Pk. (Individual, Salt Lake City, UT - #A9719.45621)	Targhee	ID
I am writing to ask you to preserve the roadless forest areas in our district. I am 81 yrs old and have hiked & backpacked in this area since 1975, when we moved to Utah. Two days ago I climbed to the Saddle just below Ben Lomond. (Individual, Ogden, UT - #A800.45621)	Wasatch-Cache	UT
Wasatch-Cache National Forest (Individual, Apo, NY - #A27804.45622)	Wasatch-Cache	UT
[Areas adjacent to] Snowbird and Snowbasin ski areas in Utah. (Individual, Alta, WY - #A19643.90820)	Wasatch-Cache	UT

**Region 5 Pacific Southwest**

Area	National Forest or Grassland	State
California. (Conservation/Preservation Organization, Williams, OR - #A21210.45500)	Multiple	CA
Wild areas of Northern California. (Individual, San Diego, CA - #A17921.90110)	Multiple	CA
4.4 million acres in California. (Individual, Fresno, CA - #A7072.10150)	Multiple	CA
National Forests in the Sierra Nevada. (Conservation/Preservation Organization, Davis, CA - #A21666.90100)	Multiple	Multiple
Throughout the Sierra Nevada and in National Forests in southern California. (Conservation/Preservation Organization, Nevada City, CA - #A4941.90110)	Multiple	CA
All roadless areas in northwestern California. (Conservation/Preservation Organization, Arcata, CA - #A21750.45621)	Multiple	CA
The Sierra Nevada Mountains and forests. (Individual, Chicago, IL - #A19019.45622)	Multiple	CA
The forests I visit here in California . . . the Sierra Nevada. Roadless area	Multiple	CA

designation would protect San Diego County's Cypress, which does not grow anywhere else and is down to the last few. (Individual, La Mesa, CA - #A30753.45621)		
Roadless areas in the National Forests covered by the Northwest Forest Plan. (Conservation/Preservation Organization, Missoula, MT - #A17234.45621)	Multiple	CA, OR, WA
My concern is primarily in protecting the existing roadless status of the tracts of the National Forests of the Rocky Mountain and Pacific Coastal provinces. (Individual, El Granada, CA - #A5061.45621)	Multiple	Multiple
The Angeles National Forest. (Individual, Altadena, CA - #A13450.10150)	Angeles	CA
Areas of Eldorado and Tahoe forests. (Individual, Carmichael, CA - #A7051.45622)	Eldorado, Tahoe	CA, NV
The Eldorado NF, near my home contains the Desolation Wilderness. . . . In the Tahoe NF, very little of the spectacular country north of Interstate 80 is protected. Those wishing to enjoy nature as it is are crammed into the Castle Peak and Grouse Ridge areas. These areas are very heavily used and as yet do not have wilderness protection. (Individual, Sacramento, CA - #A8271.45622)	Eldorado, Tahoe	CA, NV
The Tulare County Democratic Central Committee has endorsed permanent protection for the eligible roadless area in Tulare County. These include Black and State Mountain, Dennison Peak, Moses, Ripcon, Monache Meadows, Woodpecker, Freeman Peak, Split Mountain, Chico, Redwood canyon, North Fork and Mineral King, and several Bureau of Land Management Wilderness Study Areas including the Sheep Ridge and Mild Ranch areas. . . . Other areas including potential additions to the Golden Trout Wilderness and State and Black Mountain . . . Already, the Moses area has been recommended for Wilderness designation in the Mediated Settlement Agreement of July 1990. (Tulare County Democratic Central Committee, Porterville, CA - #A41226.45621)	Inyo	CA
Roadless areas in the Sierra Nevada that deserve protection may not be spared from logging and road building. For example, the Tahoe National Forest, which has nearly 3,000 miles of roads, forest activists found that Devils Canyon, which contains the largest stand of old growth trees in Nevada County, Lafayette Ridge, which also has old growth, and an area near Downieville and north of New York Ravine, which is important springs habitat to four rare subspecies of Caddis fly, could be logged and roaded because all three areas are less than 5,000 acres and may be overlooked by the Regional Forester. (Individual, Boise, ID - #A20396.45621)	Tahoe	CA
Inyo and Toiyabe National Forests. (Individual, Bridgeport, CA - #A7075.30100)	Inyo, Toiyabe	CA, NV
Mt. Hoffman Roadless Area in the Medicine Lake Highlands in Northern California . . . Roadless areas along the Rogue River in Oregon. (Individual, Mt. Shasta, CA - #A1649.45621)	Klamath, Modoc, Shasta-Trinity	CA, OR
[Areas adjacent to] Mammoth Mountain and Heavenly [ski areas] in California. (Individual, Alta, WY - #A19643.90820)	Inyo, Lake Tahoe Basin Management Unit	CA, NV
Roadless areas surrounding Lassen Volcanic National Parks, including the Heart Lake area, on the Lassen the Medicine Lake area on the Modoc National Forest; the roadless area between Hat Creek and East Lava Rim Roads (administered by the Shasta-Trinity National Forest); the forests of the McCloud River watershed; roadless areas surrounding the Shasta Lake National Recreation Area; roadless areas in the South Fork of the Trinity River watershed on the slopes of South Fork Mountain; The New River watershed; Mt. Eddy region, and other roadless areas adjacent to the Trinity Alps Wilderness. Roadless areas throughout the Klamath-Siskiyou region, on the Shasta-Trinity, Klamath, Modoc, Six Rivers, and Lassen National Forests. (Conservation/Preservation Organization, Kelsey,	Klamath, Lassen, Modoc, Shasta-Trinity, Siskiyou, Six Rivers	CA, OR

CA - #A15815.45000)		
I have recently enjoyed the Siskiyou Mountains, and the Los Padres National Forest in California. (Individual, Sacramento, CA - #A8254.45620)	Los Padres, Siskiyou	CA, OR
Roadless areas here, including those in Los Padres National Forest and Six Rivers National Forest . . . the Trinity Alps area. (Individual, San Francisco, CA - #A3058.45620)	Los Padres, Six Rivers	CA
Mendocino National Forest. (Individual, Willits, CA - #A12242.45622)	Mendocino	CA
I particularly support permanent protection for roadless areas such as Feather Falls, Bucks Lakes, Chips Creek in the Plumas National Forest, that are eligible for such designation. (Individual, Fairfax, CA - #A4539.45623)	Plumas	CA
Sequoia National Forests and also near sequoia groves in the Giant Sequoia National Monument. (Individual, No Address - #A16299.91221)	Sequoia	CA
The Shasta-Trinity Forest of Northern California . . . the Yolla-Bolly Middle Eel Wilderness. (Individual, Providence, RI - #A11681.90523)	Shasta-Trinity	CA
Roadless areas in California are also at risk. Timber sales in the Six Rivers and Shasta-Trinity National Forests are located in the largest concentration of ancient forest in the region, including unprotected roadless areas adjacent to the Trinity Alps Wilderness. (Conservation/Preservation Organization, Nevada City, CA - #A4941.45621)	Shasta-Trinity, Six Rivers	CA
The South Kalmiopsis and North Kalmiopsis Roadless Areas (among others) in the Siskiyou National Forest of Oregon, and about the Orleans Mountain Roadless areas in the Six Rivers and Shasta/Trinity National Forests. . . . in southwestern Oregon and northwestern California. (Individual, Los Angeles, CA - #A17161.45611)	Shasta-Trinity, Siskiyou, Six Rivers	CA, OR
Glasscreek Meadow, headwaters of the Owens River. (Individual, Mammoth lakes, CA - #A3816.45621)	Sierra	CA
I am especially concerned with protection of the roadless areas in the Elk and Sixes Rivers here where I live in southwest Oregon. There are two roadless areas in these adjoining coastal rivers, the <b>Grassy Knob</b> and <b>Copper Mountain Roadless Areas</b> . . . . I fully support creation of the Copper Salmon Wilderness Area that would essentially encompass the Copper Mountain Roadless Area and extend the protection currently afforded by the existing Grassy Knob Wilderness on up the river to include the upper portion of the Elk and adjacent portions of the Sixes. (Individual, Port Orford, OR - #A27697.45621)	Siskiyou, Six Rivers	CA, OR
Six Rivers National Forest in northern California. (Individual, Edmonds, WA - #A6927.45500)	Six Rivers	CA
Stanislaus National Forest. (Individual, No Address - #A4572.90310)	Stanislaus	CA
Tahoe National Forest (TNF) . . . two of our remaining Roadless Areas, Duncan Canyon, and the North Fork of the Middle Fork American River. (Individual, Dutch Flat, CA - #A22445.91221)	Tahoe	CA, NV
The Tahoe National Forest. (Individual, Nevada City, CA - #A1595.45621)	Tahoe	CA, NV

**Region 6 Pacific Northwest**

Area	National Forest or Grassland	State
Roadless areas in the National Forests covered by the Northwest Forest Plan. (Conservation/Preservation Organization, Missoula, MT - #A17234.45621)	Multiple	CA, OR, WA
Areas of Montana, Idaho, and Washington, such as the Gallatin Range, the Big Belts, the Whitetail-Haystack-O'Neill Roadless Area, the White Sand and Cove-Mallard roadless areas, and the Kettle Range. (Conservation/Preservation Organization, Bozeman, MT - #A20601.45621)	Multiple	ID, MT, WA
Cover/Mallard, Selkirk Mountain Roadless Area in Idaho, the South Fork Mountain Area, Quartzite Roadless Area, Kettle Range, Tucannon, Wenatchee	Multiple	ID, WA

Creek, Dark Divide, Long Swamp, Granite Mt., Jackson/Graphite, and Mt. Bonaparte in Washington are just a few designated Roadless Areas. (Business, Spokane, WA - #A22047.45621)		
Oregon. (Individual, Gresham, OR - #A14964.90110)	Multiple	OR
Oregon’s National Forests. . . . Moose Creek Roadless Area of Pelican Butte. (Individual, Eugene, OR - #A14267.45621)	Multiple	OR
1.9 million acres of roadless areas in Oregon. (David Wu, United States Representative, Oregon, Washington, DC - #A15553.10150)	Multiple	OR
North and South Santian areas and lakes, Brietenbush River, Willamette Rivers, Siuslaw, Rogue and Umpqua Rivers, Nestuoca, Columbia, Clackamas. . . . the McKenzie. (Individual, Corvallis, OR - #A14589.45621)	Multiple	OR
Oregon. . . . Larch Mountain, Eagle Creek, and the Malheur River Canyon. . . . the Siskiyou Crest Wilderness, Hells Canyon Wilderness and Wallawa Mountains wilderness. (Individual, Portland, OR - #A13916.45624)	Multiple	OR
For completeness, we will list all the Oregon roadless areas that we wish to see undisturbed from commercial enterprises: Mill Creek Wilderness Additions, Marble Point Roadless Area, Lord Hat Roadless Area, Beaver Creek Roadless Area, Bachelor and Coffin Mountain Roadless Area, Canyon Creek and East Detroit Roadless Areas, Mouse Creek Roadless Area, Pyramid Mountain Roadless Area, Maiden Peak Roadless Area, Eagle Creek Roadless Area, Memalouse Creek Roadless Area, Roaring River Roadless Area, Brice Creek Roadless Area, Diamond Lake Ranger District Roadless Area, Hardesty Mountain Roadless Area (30 miles from Eugene, OR my residence), Kangaroo Roadless Area, Zane Grey Roadless Area, North and South Kalmiopsis Roadless Area, and Pelican Butte Roadless Area. . . . (Individual, Eugene, OR - #A30137.45614)	Multiple	OR
Oregon’s wild forests. (Susan Castillo, State Senator, State of Oregon, Salem, OR - #A23660.45320)	Multiple	OR
Throughout the Willamette Valley and Oregon. (Individual, Corvallis, OR - #A19506.45621)	Multiple	OR
Washington State . . . 716,000 acres of inventoried roadless areas. (Individual, Redmond, WA - #A27191.10111)	Multiple	WA
In Washington State, King County and the rest of the United States. (Larry Phillips, Councilmember, Metropolitan King County Council, Seattle, WA - #A5761.10150)	Multiple	WA
Forests in Washington. (Individual, East Greenbush, NY - #A8821.90110)	Multiple	WA
I would like to see the Roadless Area Rule apply to <u>ALL</u> national forests (New England, Eastern, Midwest, Western, Alaskan Tongass, and other Alaskan forests etc.) (Individual, Endeavor, WI - #A8231.45622)	Multiple	Multiple
Pristine forests of my home state of Washington such as the Kettle Range Mountains in Northeast Ferry County. (Individual, Kirkland, WA - #A4832.45621)	Colville	WA
We believe that the Roadless Rule should be amended to decrease unreasonable access. For example, it is not reasonable to bulldoze roads into old growth, and a caribou or grizzly recovery area. Yet, this is happening on the Colville and Idaho National Forests, where the Stimson Access project is being allowed to proceed, in spite of endangered species living in the access areas. (Conservation/Preservation Organization, Spokane, WA - #A18013.40200)	Colville	WA
Roadless areas in Mount-Baker Snoqualmie, Okanogan, Wenatchee, Gifford Pinchot, Colville, Umatilla, Siskiyou . . . Lewis and Clark, Jefferson, and George Washington national forests, and hold each of them in equal esteem. (Individual, Bainbridge Island, WA - #A6010.45622)	Colville, George Washington, Gifford Pinchot, Jefferson, Lewis and Clark, Mt. Baker-Snoqualmie, Okanogan, Siskiyou, Umatilla, Wenatchee	ID, OR, WA

<p>In eastern Washington the following roadless areas are in peril:                  Colville National Forest                  Twin Sisters                  Hoodoo Canyon                  Thirteen Mile                  Salmon Priest Additions A &amp; B                  Abercrombie-Hooknose                  South Fork Mountain                  Cougar Mountain                  Profanity                  Bald Snow                  Grassy Top                  Umatilla National Forest                  Upper Tucannon                  Sheep                  Willow Springs. (Individual, Boulder, CO - #A15473.45624)</p>	<p>Colville, Umatilla</p>	<p>OR, WA</p>
<p>The Umpqua, and . . . the Willamette and Deschutes National Forest. (Individual, Roseburg, OR - #A19127.45621)</p>	<p>Deschutes, Umpqua, Willamette</p>	<p>OR</p>
<p>On the Gifford Pinchot National Forest, there are 97 uninventoried roadless areas greater than 1,000 acres in size. (Conservation/Preservation Organization, Olympia, WA- #A12004.45622)</p>	<p>Gifford Pinchot</p>	<p>WA</p>
<p>The Gnat timber sale—located on the Mount St. Helens National Volcanic Monument—would log parts of the 8,500-acre Clearwater Creek Roadless Area and the Smith Butte Roadless Area. . . . In addition to the Acci and Gnat timber sales, the Forest Service has prepared dozens of other sales that compromise the integrity of roadless areas, including the Alpha, Beta/Omega, Goose Egg, Johnson, Kirk, LaRoux, Limbo, Lock, Swell, Silver Watch, Upper Greenhorn, Upper Iron, and Willame timber sales. (Conservation/Preservation Organization, Olympia, WA - #A12004.45320)</p>	<p>Gifford Pinchot</p>	<p>WA</p>
<p>Examples of other proposed roadless area timber sales in Region 6 include:                  Gifford Pinchot, Aloha, Cispus Flats, Dark Canyon, Johnson, Kirk, La Roux, Limbo, Omega, P/B, Papa Bare, Swill, Upper Iron Creek, Upper Greenhorn, Mt. Hood, Salmonberry, Umpqua, Felix. (Individual, Cottage Grove, OR - #A27337.45626)</p>	<p>Gifford Pinchot</p>	<p>WA</p>
<p>29,000-acre roadless area near Portland in southwest Washington. (Individual, Portland, OR - #A1736.90520)</p>	<p>Gifford Pinchot</p>	<p>WA</p>
<p>Dark Divide, Pompey, Siouxan, Silver Star, Bourbon, Big Lava Bed, Horseshoe, Dixon Mountain, Strawberry, Spencer Ridge, Bear Creek, South Midway, West Mount Adams, Gotchen Creek, Red Lake, Red Mountain, Backbone, Cortwright, Deer Creek, Walupt, Chambers, Packwood Lake, Angry Mountain, Coal Creek Bluff, Carlton Ridge, Laughingwater, White Pass, and Tumwater. (Individual, Vancouver, WA - #A5724.45620)</p>	<p>Gifford Pinchot</p>	<p>WA</p>
<p>The Red Lake and Red Mountain (RARE II # 6076). . . . these two parcels are adjacent and contiguous to the existing Indian Heaven Wilderness Area. (Conservation/Preservation Organization, Lyle, WA - #A13303.45620)</p>	<p>Gifford Pinchot</p>	<p>WA</p>
<p>The inventoried roadless areas within the Mount St. Helens National Volcanic Monument should come under the protection of the Roadless Area Conservation Rule: Mount Margaret, St. Helens, and Kipuka. (Individual, Vancouver, WA - #A5724.45621)</p>	<p>Gifford Pinchot</p>	<p>WA</p>
<p>Include the Mt Baker/Snoqualmie and Gifford Pinchot National Forests in Washington. (Individual, Seattle, WA - #A16860.45622)</p>	<p>Gifford Pinchot, Mt. Baker-Snoqualmie</p>	<p>WA</p>
<p>Middle Fork Snoqualmie Valley, the rugged South Cascades' Rock Creek, Myrtle Lake and Chelan roadless areas, Eastern Washington's Entiat, the soothing Mad River country, the amazing Dark Divide, the high elevation Kettle</p>	<p>Gifford-Pinchot, Wenatchee</p>	<p>WA</p>

Range, the wildlife rich, upper Tucannon, and in the Olympics, the lush Upper South Fork Skokomish River Valley. (Individual, Seattle, WA - #A4835.45621)		
Also, the Kalmiopsis . . . in Oregon. . . . (Individual, Los Angeles, CA - #A19087.45622)	Siskiyou	OR
The Klamath-Siskiyou area. (Individual, Medford, OR - #A12075.90110)	Klamath, Siskiyou	OR
Klamath-Siskiyou ecoregion. (Conservation/Preservation Organization, Ashland, OR - #A20421.45310)	Klamath, Siskiyou	OR
The roadless areas in eastern Oregon. . . . Greenhorn Mtn, Twin Mtn Myrtle-Silvies, Dixie Butte, Nipple Butte, Malheur Canyon, Utley Butte, Fox Creek, Aldrich Mtn, Dry Cabin, McClellan Mtn, Glacier Mtn, Pine Cr, Canyons (Ocheco), Flay Cr, North Fork Malheur, Lookout Mtn. (Individual, Bend, OR - #A21667.45621)	Malheur	OR
The Nature Conservancy of Washington recently acquired 387 acres along White Creek, which feeds into one of the Skagit's major tributaries, the Sauk River . . . Our purchase protects the majority of the portion of this watershed that lies outside the national forest boundary, and we are working to protect the remaining portion of the stream. . . . The extraordinary health of this tributary is due to the fact that the upper watershed is almost solely contained within a roadless area of the MBSNF. (Conservation/Preservation Organization, Seattle, WA - #A21904)	Mt. Baker-Snoqualmie	WA
The Columbia Gorge Wilderness and Clackamas Wilderness. (Individual, No Address - #A13930.45621)	Mt. Hood	OR
The northwest side of Mt. Hood. . . . From the wilderness boundary westward into the Bull Run Watershed. (Individual, Portland, OR - #A1337.90523)	Mt. Hood	OR
Our family has spent a fair amount of time in the Roaring River Roadless Area. This beautiful area deserves protection and offers so many benefits with its quality river, forests, and diversity of life. (Individual, Portland, OR - #A13938.45621)	Mt. Hood	OR
Please protect our remaining roadless areas in Oregon, especially Roaring River and Helso. (Individual, Portland, OR - #A41509.45621)	Mt. Hood	OR
The proposed Roaring River Wilderness in the Mt. Hood National Forest (Estacada Ranger District). (Individual, Portland, OR - #A13942.45622)	Mt. Hood	OR
Unroaded areas in the Mt. Hood, Willamette and Umpqua National Forests. (Individual, Eugene, OR - #A24155.45310)	Mt. Hood, Umpqua, Willamette	OR
Here in Oregon, areas such as the Roaring River and Twin Lakes roadless areas in the Mount Hood National Forest, Hardesty Mountain in the Willamette National Forest, and Pelican Butte in the Winema National Forest. (Conservation/Preservation Organization, Portland, OR - #A21669.45622)	Mt. Hood, Willamette, and Winema	OR
On the Olympic Peninsula the few remaining roadless areas around the National Park. (Individual, Sequim, WA - #A6258.50000)	Olympic	WA
Inventoried roadless areas in Olympic National Forest . . . Upper Skokomish, South Quinault Ridge, Moonlight Dome, Lightning Peak, Jefferson Ridge, Jupiter Ridge, Green Mountain, Mount Zion, Quilcene, and Rugged Ridge. (Individual, Bainbridge Island, WA - #A6010.45622)	Olympic	WA
Washington State . . . the Olympic Peninsula. The history of reducing the size of the original 2 million acre Olympic Forest Reserve, created in 1897, is a heartbreaking story of unhindered natural resources consumption without regard to sustenance and long term protection of our forest resources. From a low of 300,000 acres, following President Wilson's slashing the size of the Mount Olympus National Monument during World War I, we have slowly but steadily increased the number of protected acres. The USFS Roadless initiative will continue the positive public policy embodied in the Olympic National Park designation in 1938, addition of the ocean beaches to the Park in 1953 and the Olympic National Forest Wilderness designation activities of 1984. (Individual, Vashon, WA - #A4545.45611)	Olympic	WA

Oregon . . . McDonald Peak Roadless Area. (Individual, Ashland, OR - #A18705.45621)	Rogue River	OR
<p>Comment specific to Southern Oregon. Rogue Valley Audubon Society wishes to emphasize several vitally important roadless areas in southern Oregon.</p> <p>–Pelican Butte (Winema National Forest) . . . It provides cold, pure water to Upper Klamath Lake and thus into the Klamath Basin National Wildlife Refuge complex, one of the most important waterfowl migration areas in North America. . . .</p> <p>–McDonald Peak (Rogue River National Forest)—this area is also threatened by ski development, in this case a proposed expansion of the Mt. Ashland Ski Area. The McDonald Peak area, along with nearby roadless areas (Wagner Gap, Condrey Mountain, and Kangaroo) form a critical biological connectivity zone along the Siskiyou Crest, passing high-elevation species between the Cascades to the east and other ranges of the Klamath-Siskiyou Bioregion to the west.</p> <p>–Rough and Ready Creek (Siskiyou National Forest)—this area, part of the huge 105,000 acres South Kalmiopsis roadless area, is internationally known as a center of plant biodiversity. . . .</p> <p>–Copper Salmon (Siskiyou National Forest) . . . the headwaters of the Elk River. (Conservation/Preservation Organization, Ashland, OR - #A30398.45621)</p>	Rogue River, Siskiyou, Winema	OR
The South Kalmiopsis and North Kalmiopsis Roadless Areas (among others) in the Siskiyou National Forest of Oregon, and about the Orleans Mountain Roadless areas in the Six Rivers and Shasta/Trinity National Forests. . . . in southwestern Oregon and northwestern California. (Individual, Los Angeles, CA - #A17161.45611)	Shasta-Trinity, Siskiyou, Six Rivers	CA, OR
Six Rivers and Shasta-Trinity National Forests located in the largest concentration of ancient forests in the region and including unprotected roadless areas adjacent to the Trinity Alps Wilderness, near my home in southern Oregon. (Individual, Ashland, OR - #A23399.45622)	Shasta-Trinity, Six Rivers	CA, OR
Please protect our Siskiyou—Cascade Monument. (Individual, Gold Hill, OR - #A15303)	Siskiyou	CA, OR
I have visited one of these roadless areas, Wasson Creek in the Coast Range of Oregon. (Individual, Eugene, OR - #A19263.45621)	Siskiyou	CA, OR
Roadless Areas on the Siskiyou National Forest. (Individual, Grants Pass, OR - #A30000.45100)	Siskiyou	CA, OR
<p>The following roadless areas on the Siskiyou National Forest. . . . These inventoried roadless areas are:</p> <p>South Kalmiopsis . . . North Kalmiopsis . . . Kalmiopsis Additions . . . Shasta Costa—Steep slopes, major tributary to Rogue River . . . Windy Valley . . . Squaw Mountain . . . Briggs . . . Kangaroo - National Recreation Trail . . . Copper Mountain—Proposed Copper Salmon wilderness . . . Packsaddle . . . Mount Emily—Important salmon runs and contributor of quality water to Chetco River (Individual, Cave Junction, OR - #A1711045621)</p>	Siskiyou	CA, OR
Roadless Areas in the Kalmiopsis/Wild Rogue, Elk River/Grassy Knob, Red Butte, and High Siskiyou in southwestern Oregon. (Individual, Cave Junction, OR - #A5950.50000)	Siskiyou	CA, OR
The Wild & Scenic Elk River located in the Powers Ranger District of the Siskiyou National Forest. . . . fully protect the Copper Mountain Roadless Area, the proposed Copper Salmon Wilderness, and all presently unroaded areas of the Elk River watershed. (Individual, Portland, OR - #A22094.45621)	Siskiyou	CA, OR
The range that is known as the Josephine Sheet . . . the South Kalmiopsis and North Fork Smith (and other smaller, associated) roadless areas. (Conservation/Preservation Organization, Cave Junction, OR - #A17235.50500)	Siskiyou	CA, OR
I am especially concerned with protection of the roadless areas in the Elk and Sixes Rivers here where I live in southwest Oregon. There are two roadless areas in these adjoining coastal rivers, the <b>Grassy Knob</b> and <b>Copper Mountain</b>	Siskiyou, Six Rivers	CA, OR

<b>Roadless Areas.</b> . . . I fully support creation of the Copper Salmon Wilderness Area that would essentially encompass the Copper Mountain Roadless Area and extend the protection currently afforded by the existing Grassy Knob Wilderness on up the river to include the upper portion of the Elk and adjacent portions of the Sixes. (Individual, Port Orford, OR - #A27697.45621)		
In Siuslaw National Forest: Township 15S, Range 8W section 33, and Township 16S, Range 8W, sections 4 and 5. (Individual, Deadwood, OR - #A881.45621)	Siuslaw	OR
The Siuslaw and Willamette National forests. (Individual, Eugene, OR - #A3657.45622)	Siuslaw, Willamette	OR
Wildwood National Forest Park and Tryon Creek State Park. (Individual, Gresham, OR - #A14376.45000)	Tryon Creek State Park, Wildwood National Forest Park	OR
The “Lost Forest” in the southeast area of Oregon. (Individual, Gladstone, OR - #A14249.90130)	Umatilla	OR
The Umpqua’s designated roadless areas. (Individual, Queensbury, NY - #A4963.45622)	Umpqua	OR
Cottage Grove Ranger District of the Umpqua National Forest. . . . The areas such as those around Mt. June, Cedar Creek and Fairview Creek. (Individual, Cottage Grove, OR - #A6241.45621)	Umpqua	OR
Places like the Mt. Bailey roadless area, the largest unprotected roadless area on the Umpqua National Forest. (Individual, Roseburg, OR - #A1497.45622)	Umpqua	OR
Umpqua National Forest. . . . In particular, in the Umpqua National Forest the large roadless area west and north of Diamond Lake. . . . the roadless area west of Boulder Creek Wilderness and north of Highway 138. . . . roadless areas just south of the North Umpqua River on the western edge of the national forest. (Individual, Glide, OR - #A22303.45622)	Umpqua	OR
The McKenzie River basin. (Individual, Portland, OR - #A14265.45621)	Umpqua, Willamette	OR
Please leave areas such as Eagle Wilderness in northeastern Oregon as it is. (Individual, No Address - #A23521.45621)	Wallowa-Whitman	OR
Wenatchee National Forest. (Individual, Claremont, CA - #A15513.90520)	Wenatchee	WA
The Mad River country in the Wenatchee National Forest. (Individual, Seattle, WA - #A16824.45621)	Wenatchee	WA
<b>Mission/Sand Creek Watersheds</b> 1. Devil’s Gulch Roadless Area <b>Ingalls Creek Watershed</b> 2. Ingalls Creek 3. Wedge Mountain <b>Icicle River Watershed</b> 4. Snow Creek Cle-Elum Ranger District 5. Mt. Cashmere 6. Trout Creek 7. Icicle Ridge <b>Nason Creek watershed</b> 8. Chiwaukum Creek 9. White Pine 10. Nason Ridge <b>White River &amp; Little Wenatchee</b> 11. Smith- Brock 12. Little Wenatchee 13. Canyon Creek Roadless Area <b>Chiwawa River Watershed</b> 15. Chiwawa 16. Rock Creek <b>Entiat River Watershed</b> 17. Myrtle Lake Roadless Area (10,918 acres)	Wenatchee	WA

<p>18. Entiat Roadless Area (72,526 acres)                  19. Stormy Mountain Roadless Area                  20. Slide Ridge Roadless Area  <b>Lake Chelan Watershed</b>                  21. South Shore                  22. North Shore                  23. Domke                  24. Holden  <b>Cle-Elum Ranger District</b>                  25. Naneum                  26. Lion Rock                  27. Wilson Creek                  28. Swauk                  29. Red Top                  30. Teanaway st                  31. Upper Cle Elum River                  32a. So. Alpine Lakes Cooper Lake                  32b. So. Alpine Lakes Mineral Creek                  32c. So. Alpine Lakes Box Canyon                  34. Thorp Mountain                  36. Mt. Clifty                  37. Taneum                  39. Quartz  <b>Naches Ranger District</b>                  38. Manastash Ridge                  33. Annette Ridge                  35. Blowout Mountain Mountain                  40. Little Naches                  41. American River                  42. Bumping                  43. Naches                  44. William O. Douglas Adjacent                  45. Devil's Table                  46. Bethel Ridge                  47. White Pass                  48. Blue Rocks Adjacent                  49. Goat Rocks Adjacent                  (Conservation/Preservation Organization, Peshastin, WA - #A28181.45621)</p>		
<p>Bethel Ridge Roadless Area. (Individual, Peshastin, WA - #A28210.45621)</p>	<p>Wenatchee</p>	<p>WA</p>
<p>Blue Slide Roadless Area                  Boz Creek Roadless Area                  Mineral Creek Roadless Area                  Cooper River Roadless Area (Conservation/Preservation Organization, Peshastin, WA - #A28181.45621)</p>	<p>Wenatchee</p>	<p>WA</p>
<p>The Cornpatch Inventoried Roadless Area located on the Willamette National Forest. (Conservation/Preservation Oregon, Eugene, OR - #A21798.45621)</p>	<p>Willamette</p>	<p>OR</p>
<p><b>Roadless Areas in the Old Cascades/Middle Santiam</b> of the central Willamette National Forest:  <b>Moose Lake RS, Gordon Meadows RA, Jumpoff Joe RA, Browder Ridge RA, Echo Mt. RA, Three Pyramids RA, Pyramid Creek RA and Big Meadows RA.</b> (Conservation/Preservation Organization, Albany, OR - #A19057.45621)</p>	<p>Willamette</p>	<p>OR</p>
<p>Examples of current timber sales impacting roadless areas in the Willamette National Forest include:                  Moose Timber Sale, Sweet Home District, Willamette National Forest (EIS completed, Decision Notice signed). The sale includes commercial harvest in the</p>	<p>Willamette</p>	<p>OR</p>

<p>5,674 acres RARE I Moose Creek Roadless Area, which currently provides important connectivity for wildlife between the Menagerie and Middle Santiam Wilderness Areas. Moose Creek proper is eligible for designation as a Wild and Scenic River. . . .</p> <p>South Pyramid Timber Sale, Sweet Home District, Willamette National Forest (EA in scoping). . . . The Three Pyramids unroaded area is an extremely popular recreation destination and the Sough Pyramid Creek Trail travels through the heart of the planning area.</p> <p>Helldun Timber Sale, Middle Fork District, Willamette National forest (EA completed, currently offered as replacement volume to Scott Timber). . . .</p> <p>Currently, the Helldun ancient forest is part of a 2,000-acre block of fragmented ancient forest that connects the Waldo Wilderness with the RARE II inventoried Cornpatch roadless area. Combined, these roadless areas total over 35,000 acres, one of the largest intact forests in the Middle Fork District. The timber sale calls for logging over the popular Eugene to Crest Trail and degrading the Eagle Creek special Interest Area, one of only two special interest areas in the Willamette National forest. The planning area has also been proposed as a Research Natural Area to be preserved for scientific study of its unique ecological characteristics.</p> <p>Coffin Timber Sale, Detroit District, Willamette National Forest (EA completed, Decision Notice signed, sale unawarded). While the EA for the Coffin timber sale proposed logging 2.77 mmbf from 277 acres of the Coffin/Bachelor Mountain roadless “semiprimitive area” after the decision notice was signed, the volume doubled to 5.37 mmbf. The Coffin Mountain timber sale is located within the Marys Creek Sub-basin of the upper North Santaim watershed, which contributes to the municipal drinking water supply for over 165,000 Oregonians. (Conservation/Preservation Organization, Missoula, MT - #A17234.45626)</p>		
<p>The Willamette National Forest in Oregon is particularly egregious in their drive to log late seral and old growth where ever they can and much is in roadless areas. Moose Creek above Sweet Home is a low elevation roadless area, usable over an extended part of the year, scheduled for logging. South Pyramids is a higher elevation roadless area SE of Detroit (but within the Sweet Home Ranger District) which exhibits fabulous alpine character. Trails rise to this IRA from the Middle Cascades Wilderness with logging planned all along the way! Helldun on the Middle Fork of the Willamette is another. Why in the world log over the Eugene-to-Crest Trail and within sight of Waldo Lake? It also forms a significant connection through the Cornpatch IRA to the Waldo Lake Wilderness Area. There are timber sales planned in the Coffin/Bachelor Mountain IRA semi-primitive area in the Detroit Ranger District. This in the city of Salem municipal water supply!</p> <p>Mt. Hood logs incredible swaths in direct view from the lodge at Mt. Hood. Tourists ask what kind of place is this! Alpine vistas show the clearcuts in stark relief in the wintertime snows: from Mt. Hood, and on public roads through the Willamette.</p> <p>Further, there are wilderness areas such as Opal Creek which are islands within a sea of either IRA or unroaded areas (many in the 1000-5000 acre range). Cummins Creek and Drift Creek on the Siuslaw where I hike every winter (rainforests aren’t rainforests unless they are wet and drippy). I hike the Olympics and North Cascades National Parks, and again roadless areas, both IRA, and unroaded areas 1000-5000 acres in size define the boundaries of these incredible areas. I hike on trails in the Leavenworth area logged over in an IRA. (Individual, Corvallis, OR - #A15303.4561)</p>	<p>Willamette</p>	<p>OR</p>
<p>Areas in Oregon such as Moose and Hardesty roadless areas. (Individual, Eugene, OR - #A24106.45621)</p>	<p>Willamette</p>	<p>OR</p>
<p><b><i>(3 Pyramids Roadless Areas) or (Browder Ridge RA in the Willamette NF) (should not be exempted from protection.)</i></b> (Conservation/Preservation</p>	<p>Willamette</p>	<p>OR</p>

<p>Organization, Albany, OR - #A19057.25200)</p>		
<p>Protection of the Willamette National Forests is crucial to Salem’s water supply in addition to the protection of habitat for threatened and endangered species, biodiversity, and recreation. (Mike Swain, Mayor, City of Salem, Salem, OR - #A23678.45622)</p>	<p>Willamette</p>	<p>OR</p>
<p>Roadless areas in the Willamette National Forest in Oregon. Many are listed in Appendix C of the FEIS of the Land and Resource Management Plan.                  –Bull of the Wood - Steep and mountainous, trails, adjacent to Bull of the Wood Wilderness. . . .                  –Elkhorn . . . Phantom Natural Bridge.                  –Mt. Jefferson North and South . . . adjacent to Mt. Jefferson Wilderness . . .                  –Echo Mountain—Six peaks over 5,000 feet including Crescent Mountain and Iron Mountain trails, meadows, wildflowers.                  –Moose Lake . . . Moose Lake and Creek. . . .                  –Gordon Meadows. . . .                  –Mt. Washington North, West, and South . . . adjacent to existing wilderness, trails, Santiam wagon Road.                  –Mt. Hagan. . . .                  –McLennon Mountain. . . .                  –Chucksney Mountain. . . .                  –Fuji Mountain, Salmon Creek, Many Prairies, Koch, Moolack. . . .                  –Cornpatch. . . .                  –Maiden Peak . . . Gold Lake Bog. . . .                  –Diamond Peak North and South - Lower slopes of Diamond Peak, adjacent to wilderness, trails, Lopez Lake.                  –Many others outside of the Willamette National Forest: Soda Mountain, Pelican Butte, Hells Canyon, John Day, Malheur Basin, Blue Mountains, Metolius River, Upper Deschutes, Newberry Crater, Wallowa Mountains. (Individual, Eugene, OR - #A13952.45624)</p>	<p>Willamette</p>	<p>OR</p>
<p>Pelican Butte. (Individual, Klamath Falls, OR - #A3651.10000)</p>	<p>Winema</p>	<p>OR</p>
<p>Our property is bordered on three sides by the 1.1 million acre Winema National Forest. Of that 1.1 million acres a mere 32,200 acres or 2.97% would be managed under the Roadless Area Conservation Rule. It is my belief that this is not enough, especially given the fragmented and disconnected nature of roadless areas in the Winema. . . . Water quality and quantity is the most important issue in the Klamath Basin. Pelican Butte is a Tier II Watershed and is recognized as a significant source of the highest quality water entering Upper Klamath Lake. It is also a critical element in the ecological health if the Upper Klamath Marsh and Wildlife Refuge. Pelican Butte would also become the largest continuous roadless area in the Winema National Forest and must be provided the highest level of protection afforded under Roadless Area Conservation. (Individual, Klamath Falls, OR - #A4970.45622)</p>	<p>Winema</p>	<p>OR</p>
<p>We live in Washington State, at the foot of Mt. Rainer, on the northwest corner of the National Park. Surrounding the mountain inside of Park is a VIRGIN, TEMPERATE, INLAND RAINFOREST, with well over 200 inches of annual rainfall. We live on our own privately owned lands in the middle of timber company holdings, just a few miles from the entrance to the Park. There are about 50 people that live in our unincorporated area of Fairfax. We see the atrocities that are inflicted on the forests during clear-cutting and spraying of poisons. We are first-hand witnesses to this destruction, because we see it everyday. Our VIRGIN TEMPERATE, INLAND RAINFOREST in the park is being affected by industry logging RIGHT UP TO IT’S BORDER in three separate sections on the north side, seven miles of the west places. We barely have one mile of Forest Service lands as a buffer for the Park in many places.</p>	<p>Mt. Baker-Snoqualmie</p>	<p>WA</p>

Clear-cutting was drastically escalated before the salmon plan kicked in. They logged all of our seven-mile INLAND, TEMPERATE, RAINFOREST valley in just a few short years. (We have only [small] sections that are public-owned 'islands' of land in our valley, and the oldest tree farm is just 28 years old.) (Conservation/Preservation Organization, South Prairie, WA - #A28978.65200)		
I would especially be opposing any logging in the Skykomish Wild Country near INDEX. (Individual, Seattle, WA - #A41071.90520)	Mt. Baker-Snoqualmie	WA
The Late Succession Reserves of the owl region. (Individual, Redmond, WA - #A27191.45000)	Multiple	WA

### Region 8 Southern

Area	National Forest or Grassland	State
State of Alabama. (Individual, Sylacauga, AL - #A1486.90520)	Multiple	AL
Gulf Coast of Florida. (Individual, Marietta, GA - #A5226.90720)	Multiple	FL
This is especially important for restoring Florida's Ancient forests, as part of Everglades Restoration. (Conservation/Preservation Organization, No Address - #A9063.45622)	Apalachicola, Ocala, Osceola	FL
National Forests, especially those here in South Carolina and in North Carolina. (Individual, Charleston, SC - #A23690.50000)	Multiple	NC, SC
Roadless areas on the National Forests in North Carolina and South Carolina. (Individual, Walhalla, SC - #A6292.90520)	Multiple	NC, SC
Texas. (Individual, Grapevine, TX - #A19161.45310)	Multiple	TX
Please preserve those that we still have, especially the Piney Woods and grasslands of Texas. (Individual, Houston, TX - #A25958.45621)	Multiple	TX
Virginia. (Individual, East Greenbush, NY - #A8821.90110)	Multiple	VA
The southern Appalachians. (Individual, Rindge, NH - #A4812.90130)	Multiple	Multiple
In Appalachian forests. (Conservation/Preservation Organization, Ashland, OR - #A20421.45310)	Multiple	Multiple
National Forests in the Southern Appalachians. (Conservation/Preservation Organization, Bland, VA - #A17007.45621)	Multiple	Multiple
Land bordering the Long and Appalachia Trails. (Individual, Norwhich, VT - #A15153.45624)	Multiple	Multiple
Include areas identified in the Southern Appalachian Assessment. (Conservation/Preservation Organization, Santa Fe, NM - #A22092.45400)	Multiple	Multiple
National forests and ranger districts with few or no roadless areas, such as those on the Alleghany NF, Daniel Boone NF, Mississippi NF, Clinch RD and other NFs in the Deep South, Midwest, and Piedmont and Coastal Plain should designate 35-40% of the NF or RD as "roadless restoration areas" where road obliteration, stream restoration, and other ecological restoration techniques are used to return the land to a healthy and wild condition. (Individual, Roanoke, VA - #A23081.10150)	Multiple	Multiple
I would like to see the Roadless Area Rule apply to <u>ALL</u> national forests (New England, Eastern, Midwest, Western, Alaskan Tongass, and other Alaskan forests etc.) (Individual, Endeavor, WI - #A8231.45622)	Multiple	Multiple
Smaller forests such as Angelina, Davy Crockett and Sabine here in Texas. (Individual, Shiro, TX - #A5015.10152)	Angelina, Davy Crockett, Sabine	TX
Here is a list of large areas you should include in the State of Texas: Long Leaf Ridge Special Area in the Angelina NF (32,300 acres) Little Lake Creek in the Sam Houston NF (671 adjacent acres) Big Creek Wilderness Area in the Sam Houston NF (1,920 acres) Winters Bayou Scenic Area in the Sam Houston NF (1,587 acres) Beech Ravines Scenic Area in the Sabine NF (1,020 acres) Upper Colorow Creek Scenic Area in the Sabine NF (230 acres)	Angelina, Davy Crockett, Sabine, Sam Houston	TX

<p>Mill Creek Cove Research Natural Area in the Sabine NF (301 acres)                  Bear Creek Special Bottomland Area in the Sabine NF (665 acres)                  Ayish Bayou Special Bottomland Area in the Angelina NF (3,500 acres)                  Attoyac Bayou Special Bottomland Area in the Angelina NF (3,500 acres)                  Upper Angelina River Special Bottomland Area in the Angelina NF (6,100 acres)                  Neches River Corridors, segments 1-4 on the Davy Crockett and Angelina NFs                  Turkey Creek Wilderness Area (152 acres adjacent to the east)                  Big Woods Area of the Sam Houston NF (1,250 acres south of F.R. 202 and east of F.R. 207). (Individual, Houston, TX - #A6735.45621)</p>		
<p>We want more Roadless Areas in the National Forests and Grasslands in Texas. Only 4,000 acres were proposed in the RPR for all four Texas National Forests. All 4,000 acres proposed were in Sam Houston National Forest. No Roadless Areas were proposed for Angelina, Davy Crockett, and Sabine National Forests. (Conservation/Preservation Organization, Bellaire, TX - #A883.10150)</p>	<p>Angelina, Davy Crockett, Sabine, Sam Houston</p>	<p>TX</p>
<p>In Texas I urge to do include the following areas in the areas protected by the Roadless Area Conservation Rule: . . . Upper Coloran Creek Scenic Areas in the Sabine. (Individual, Austin, TX - #A21855.45611)</p>	<p>Angelina, Sabine, Sam Houston</p>	<p>TX</p>
<p>In Texas areas threatened by NOT going forward with the Rule are:                  1. Five areas in the Angelina National Forest, more than 37,000 acres, additionally four different linear segments along the Neches River.                  2. Five areas in the Sam Houston National forest, about 5,428 acres.                  3. Four areas in the Sabine National Forest approximately 2,216 acres. (Individual, Dallas, TX - #A15520.45622)</p>	<p>Angelina, Sabine, Sam Houston</p>	<p>TX</p>
<p>Bankhead National Forest. (Individual, Westminster, MD - #A1254.65200)</p>	<p>Bankhead</p>	<p>AL</p>
<p>The Chattahoochee National Forest. (Individual, Decatur, GA - #A19228.91221)</p>	<p>Chattahoochee-Oconee</p>	<p>GA</p>
<p>On the Chattahoochee National Forest the following inventoried roadless areas should be permanently protected: Kelly Ridge, Mountaintown, Patterson Gap, Rabin Bald, Rock Gorge, Three Forks. (Individual, Atlanta, GA - #A11595.45622)</p>	<p>Chattahoochee-Oconee</p>	<p>GA</p>
<p>Roadless Areas in Georgia such as Kelly Ridge, Mountaintown, Patterson Gap, Sarah's Creek, and Rock Gorge. . . . Patterson Gap, headwaters of the Chattooga River. (Conservation/Preservation Organization, Ellijay, GA - #A17692.54000)</p>	<p>Chattahoochee-Oconee</p>	<p>GA</p>
<p>Here in the Southern Appalachians, where only 15.4%, or 726,000 acres, of National Forest System lands still qualify as roadless, local forest planning has similarly failed to protect roadless areas. . . . Rabun Bald roadless areas on the Chattahoochee National Forest . . . including Rabun Bald which at 4,696 feet is the second highest peak in Georgia, and the famed Bartram National Recreation Trail. . . . in Tuckaluge Creek. . . . As little as 6,000 acres of Sarah's Creek, out of the original 16,000 acres Rabun Bald roadless area, is being considered for protective prescriptions                  Iron Mountain in the Cherokee National Forest of Tennessee provides another example of the rapid deterioration of the roadless resource in the Southern Appalachians. This large formerly roadless tract was inventoried at approximately 14,000 acres during RARE II. The Forest Service did not recommend wilderness for the area in RARE II, and shortly thereafter conducted road construction and logging operations in the area. As a result, only a tiny segment of the Iron Mountain roadless area remained. London Bridge, a 3,041 acre tract in the northern part of Iron Mountain, has retained its roadless character and was inventoried in the SAA. According to biologists who have studied the area, London Bridge is an area of critical importance to the ecology and wildlife of the area. It is perhaps the only viable corridor for black bear to travel between the Cherokee (TN) and the Jefferson (VA) National Forests. (Conservation/Preservation Organization, Charlottesville, VA - #A15659.45624)</p>	<p>Chattahoochee-Oconee, Cherokee, Jefferson</p>	<p>GA, TN</p>

<p><b>George Washington and Jefferson National Forests</b>                  The proposed Ernie Dickerman Wilderness Area along Shenandoah Mountain. This area of 65,000 acres, as proposed by the Forests of the Central Appalachians Project, includes the 6,519 acres of the Ramseys Draft Wilderness. . . .                  Radar Mountain, above Reddish Knob. . . .                  Seng Mountain area is home to Rowlands Creek Falls. . . .                  Raccoon Branch features Dickey Knob which overlooks the small community of Sugar Grove. It contains several hundred acres of potential old-growth and offers solitude with 95 percent of this area retaining unspoiled qualities. Portions of the popular Mt. Rogers NRA Crest Zone are potential additions to the Little Wilson Creek Wilderness. . . .                  The Crawfish Valley, also referred to as Bear Creek, contains several hiking trails, including the Appalachian Trail, and horseback riding trails. . . .                  Garden Mountain offers scenic views into the historic Burke’s Garden area. Twenty-four miles of the Appalachian Trail traverses the area. . . .                  Brush Mountain East maintains 90 percent of its scenic beauty. Nearby is the monument to Audie Murphy, a World War II hero whose plane crashed on the mountain.</p> <p><b>Cherokee National Forest</b>                  London Bridge is an important water source for the residents of Sutherland. This 3,431 acres offer views of Doe Valley, Rogers Ridge, and Mount Rogers. Beaverdam Creek. . . .                  Rogers Ridge contains the Rogers Ridge Scenic Area in addition to areas north and south. . . .                  The Bald Mountain . . . The Appalachian Trail crosses through the area. . . . Bald River offers one 1,737 acres area as an extension to the existing Bald River Gorge Wilderness. . . .</p> <p><b>Pisgah and Nantahala National Forests</b>                  Bald Mountains includes both Big Creek and Seng Ridge comprising 13,000 acres along the Tennessee and North Carolina border. . . .                  Linville Gorge Wilderness extension to the east contains the headwaters of Irish Creek and Russell Creek. The North Carolina Mountain-to-Sea Trail crosses along the western border.                  Upper Wilson Creek lies north of the proposed Lost Cover Wilderness. . . .                  Black Mountains contains several rare species and has been a top priority for wilderness designation.                  Jarrett Creek contains the headwaters to its namesake Jarrett Creek as well as Pritchard Creek. . . .                  Mackey Mountain offers black bear habitat and good trout fishing in Curtis Creek.                  Woods Mountain is 11,000 acres. . . .                  Cheoah Bald is an area of 13,000 acres containing the Appalachian Trail, Nantahala River, Nantahala Gorge, and Cheoah Bald.                  Wesser Bald contains the Appalachian Trail. . . .                  Snowbird is a top priority for wilderness designation and contains Snowbird Creek which is a wild and scenic river candidate.</p> <p><b>Francis Marion and Sumter National Forests</b>                  Elliott Rock I and II potential Wilderness areas. These 2000 acres contain a critical watershed for the Chattooga River. . . .                  Rock Gorge is 11,000 acres (6,500 acres in South Carolina and 4,500 acres in Georgia) of virtually undisturbed, wild land. It contains several trails and waterfalls including an 80 foot waterfall along King Creek. . . .                  Hell Hole Bay Wilderness 890 acres extension to the south.                  Little Wambaw Swamp Wilderness 530 acres extension west to Wambaw Swamp Wilderness.</p>	<p>Chattahoochee, Cherokee, Francis Marion, George Washington, and Nantahala, Pisgah, Sumter, Jefferson</p>	<p>Multiple</p>
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<p><b>Chattahoochee National Forest</b>                  Rock Gorge is 11,000 acres (6,500 acres in South Carolina and 4,500 acres in Georgia). . . .                  The Rabun Bald area. . . .                  Patterson Gap is a rugged area of many high peaks including Wolf Knob, 3,979 ft. elevation. Persimmon Creek and Howard Branch provide wild trout . . . .                  Kelly Ridge-Moccasin Creek contains Moccasin Creek. . . .                  Springer Mountain is the main feature of this 12,000 acres. It serves as the southern terminus of the Appalachian Trail.                  Mountaintown. . . . (Conservation/Preservation Organization, Roanoke, VA - #A10565.45624)</p>		
<p>We note that, relative to total woodlands in Tennessee, roadless area of the Cherokee National Forest make up only one-half of one percent. We urge its protection from future fragmentation, and similar protection of all the now designated areas in all our national forests. (Civic Group, Mountain Home, TN - #A28695.45622)</p>	Cherokee	TN
<p>Devil's backbone near the Hartford exit of I-40. (Individual, Knoxville, TN - #A2377.13212)</p>	Cherokee	TN
<p>Unroaded sections in the Cherokee and other national forests. (Civic Group, Nashville, TN - #A10552.10150)</p>	Cherokee	TN
<p>In the Cherokee and Jefferson National Forests. (Individual, No Address - #A1724.90310)</p>	Cherokee, Jefferson	VA, WV
<p>South Carolina . . . Frances Marion National Forest and Sumter National Forest. (Individual, Goose Creek, SC - #A5449.70000)</p>	Frances Marion-Sumter	SC
<p>George Washington National Forest, in places such as Mount Pleasant, Romsey's Draft and Saint Mary's.</p>	George Washington	VA
<p>These citizens value the roadless areas in the George Washington and Thomas Jefferson National Forests as a vital source of clean water for both consumption and the fisheries that are so much a part of our Virginia's heritage as well as an opportunity to preserve pristine wildlife habitat. (James P. Moran, United States Representative, Virginia, Washington, DC - #A23396.45622)</p>	George Washington, Jefferson	VA
<p>Locally, a quarter of the total national forest is located in Virginia and as a resident of Virginia, the fate of these forests is of top concern to me. . . . Hone Quarry - part of the George Washington National Forest. (Individual, No Address - #A30370.45622)</p>	George Washington, Jefferson	
<p>Virginia's National Forests. (Individual, Richmond, VA - #A888.10111)</p>	George Washington, Jefferson	VA, WV
<p>The Laurel Fork Area of the George Washington National Forest . . . The Devil's Fork Area of the Jefferson National Forest. (Conservation/Preservation Organization, Johnson City, TN - #A20341.90720)</p>	George Washington, Jefferson	VA, WV
<p>George Washington and Jefferson National Forest in Virginia. (Conservation/Preservation Organization, Blacksburg, VA - #A13525.45622)</p>	George Washington, Jefferson	VA, WV
<p>Jefferson NF or the GWNF (e.g., Stony Point Ridge, Potts Mtn., and Wilson Mtn.). (Individual, Staunton, VA - #A29325.45420)</p>	George Washington, Jefferson	VA, WV
<p>These are inventoried roadless areas I recommend for protection under the RACR. North Fork of the Pound, Clinch RD, JNF. Devils Fork, Clinch RD, JNF. Lewis Fork Additions and Little Wilson Cr. Additions (all) Mt Rogers NRS, JNF. Song Mtn., Mt. Rogers NRA, JNF. Little Dry Run Additions (all), Mt. Rogers NRA. Horse Heaven, Mt Rogers NRA. Crawfish Valley (Bear Creek) New River RD. Beartown Mtn. Additions (all), New River RD. Garden Mtn., New River RD. Little Wolf Cr/Hunting Camp, New River RD, JNF. Long Spur, New River RD, JNF. Mtn. Lake Additions, New River RD, JNF. Peters Mtn., New River RD, JNF. Hickory Flats, New River RD, JNF. Brushy Mtn. I Audie Murphy, New River RD, JNF. Mottlesheard, New Castle RD, JNF. Shawvers Run Additions (all) New Castle RD, JNF. North Mtn., New Castle</p>	George Washington, Jefferson	VA, WV

RD, JNF. Broad Run, New Castle RD, JNF. Price Mtn. New Castle RD, JNF. Patterson Mtn. New Castle RD, JNF. Hoop Hole New Castle RD, JNF. James River Face Extension Glenwood RD, JNF. These are de facto roadless areas I recommend for protection under the RACR. Whitetop Mtn. Mt. Rogers NRA, JNF. Feathercamp Mt. Rogers NRA, JNF. Mt. Rogers South NRA, JNF. Erwing Mtn. Devils Den Mto Rogers NRA. Stone Mtn. of Cave Springs, Clinch RD, JNF. Roaring Branch, Clinch RD, JNF. Little Stony, Clinch RD, JNF. Lynn Camp Cr., New River RD, JNF. Dismal Creek, NEw River RD, JNF. Wilson Mountain, Glennwood RD, JNF. Terrapin Mountain, Glennwood RD, JNF. Sinking Creek Mountain, New Castle RD, JNF. George Washington NF. Jerkentight RA, Little Mtn. RA, Elliot Knob RA, Crawford Mtn. RA, Dolly Ann RA, Oliver Mtn. RA, Big Schloss RA, Ramseys Draft Additions. (Individual, Roanoke, VA - #A23081.45621)		
Also consider the 40,000 acres that Westvaco has for sale adjacent to the Jefferson National Forest between the cities of Lexington and Roanoke west of Interstate 81 and south of Interstate 64. (Individual, Haymarket, VA - #A4022.45621)	Jefferson	VA, WV
Areas in Jefferson National Forest. Broad Run (10959), North Mountain (8451), and the Wilderness addition to Barbour's Creek W.A. (732) . . . in the Newcastle Ranger District. (Individual, Salem, VA - #A15250.45622)	Jefferson	VA, WV
Terrapin Mountain in Virginia. (Individual, Danville, VA - #A1158.90520)	Jefferson	VA
Mark Twain National Forest here in Missouri. (Individual, No Address - #A12627.90523)	Mark Twain	MO
The Monongahela National Forest in West Virginia. (Individual, Webster Springs, WV - #A4005.60110)	Monongahela	WV
Roadless areas in the Pisgah/Nantahala National Forests in NC . . . like Laurel Mountain, South Mills River, Tusquittee, and the Black Mountains. Others like Mackey Mountain. (Individual, Cedar Mountain, NC - #A28624.10111)	Nantahala, Pisgah	NC
We have about 726,000 acres of roadless area in the Southern Appalachians. . . . Bald Mountain in Eastern Tennessee . . . the Clinch River in Virginia. (Individual, Asheville, NC - #A30306.45621)	Multiple	Multiple
Include the Ozark/St. Francis and Ouachita National Forests in Arkansas. (Individual, Seattle, WA - #A16860.45622)	Ouachita, Ozark-St. Francis	AR
Pisgah National Forest. (Individual, Wilmington, NC - #A22679.51300)	Pisgah	NC
The Talladega National Forest, which is part of my own Calhoun County. (Robert W. Downing, Commissioner, Calhoun County Board of County Commissioners, Aniston, AL - #A11835.45622)	Talladega	AL

### Region 9 Eastern

Area	National Forest or Grassland	State
Pennsylvania, West Virginia. (Individual, East Greenbush, NY - #A8821.90110)	Multiple	PA, WV
Southern West Virginia. (Individual, Welch, WV - #A1189.90110)	Multiple	WV
National Forest areas in New England. (Individual, Largo, Fl - #A16364.45100)	Multiple	Multiple
[Forests in] Massachusetts. (Individual, Jamaica Plain, MA - #A16807.45620)	No National Forests	MA
Protect all roadless areas of Northeast Forests . . . including within Great Lakes-Northwood's National forests). (Conservation/Preservation Organization, Buffalo, NY - #A10586.45320)	Multiple	Multiple
The White Mountains, the Long Trail and Appalachian Trail areas, Acadia National Park. (Individual, Vernon Rockville, CT - #A13252.10150)	Multiple	Multiple
Land bordering the Long and Appalachia Trails. (Individual, Norwich, VT - #A15153.45624)	Multiple	Multiple

National forests in New England and Eastern US. (Individual, Southold, NY - #A6562.90110)	Multiple	Multiple
We were pleased that the final rule included roadless areas identified in the Southern Appalachian Assessment in the definition of inventoried roadless areas. However, the definition still omits many roadless areas both in the Southern Appalachians and elsewhere that have never been inventoried for one reason or another. Some areas, such as Dolly Sods in West Virginia and Lamb Brook in Vermont, were acquired by the Forest Service after the 1979 RARE II inventory and have not been inventoried in a forest plan or regional assessment. In Washington State, omitted roadless lands include entire areas such as Lookout Mountain (12,000 acres), lands adjacent to inventoried roadless areas such as Granite Mountain (27,000 acres), and lands adjacent to designated wilderness such as the Alpine Lakes Wilderness (75,000 acres). While it may not be possible to evaluate such areas in the final EIS, we recommend that the final policy direct the Forest Service to accord them interim protection and to include them in the roadless area inventory through project or plan revision processes. (Conservation/Preservation Organization, Missoula, MT - #A21359.45624)	Multiple	Multiple
Allegheny National Forest. (Individual, Aliquippa, PA - #A135.90520)	Allegheny	PA
Chippewa, Superior, and the Chequamegon-Nicolet. . . . National Forests east of the Mississippi will not be protected by the Roadless initiative. The Chippewa National Forest has NO roadless areas. The Superior, with 60,000 acres and the Chequamegon-Nicolet with 69,000 acres must have better protections not less protection. (Individual, Lake Tomahawk, WI - #A29653.45320)	Chequamegon-Nicolet, Chippewa, Superior	WI, MN
Roadless areas, here in Wisconsin. (Individual, Madison, WI - #A14290.65280)	Chequamegon-Nicolet	WI
The Leroy Creek area, adjacent to the Whisker Lake Wilderness, is considered to be the last big block of forest on the Nicolet National Forest. . . . Log Creek on the Great Divide district of the Chequamegon National Forest. (Individual, Lake Tomahawk, WI - #A29653.45100)	Chequamegon-Nicolet	WI
As for Wisconsin, there is very little left. Of the 69,000 acres of inventoried roadless area, all of it allows road construction. In fact, a recent timber sale, the Salvage Blowdown project, on the Eagle River-Florence District in the Tipler/Trout Springs area logged within one of the inventoried roadless areas. Comments raised were dismissed due to the fact logging in that area has gone on ever since RARE II came out. Wisconsin is a perfect example of why this area needs to be protected. Out of 1.5 million acres of National Forest land, only 43,000 acres is wilderness. (Individual, Lake Tomahawk, WI - #A29653.45620)	Chequamegon-Nicolet	WI
Wisconsin's Chequamegon-Nicolet National Forest. (Conservation/Preservation Organization, Nevada City, CA - #A4941.45621)	Chequamegon-Nicolet	WI
The Leroy Creek area, adjacent to the Whisker Lake Wilderness, is considered to be the last big block of forest on the Nicolet National Forest. And yet logging can occur in this area at any time. Outstanding trout streams, such as Log Creek on the Great Divide district of the Chequamegon National Forest should be permanently protected so that this resource is not degraded by logging, road building, and attendant sedimentation. (Individual, Minneapolis, MN - #A10523.45622)	Chequamegon-Nicolet	WI
Minnesota . . . home to the Superior and Chippewa National Forests. (Individual, Minneapolis, MN - #A8000.10111)	Chippewa, Superior	MN
In the Laurel Fork Area of the George Washington National Forest. . . . The Devil's Fork Area of the Jefferson National Forest. (Conservation/Preservation Organization, Johnson City, TN - #A20341.90720)	George Washington, Jefferson	VA, WV
60 million acres of wilderness around Glastonbury Mountain, Romance Mountain, and Lamb Brook. (Individual, Norwich, VT - #A15153.45624)	Green Mountain	NY, NY

Protect Taconic Mountain area in the Green Mountains National Forest in Vermont. (Individual, Waterbury, VT - #A15433.45430)	Green Mountain	VT
The Green Mountains of Vermont. (Individual, Charlotte, VT - #A12826.45621)	Green Mountain	NY, VT
Local Adirondack forestlands. (Individual, Postdam, NY - #A30466.45621)	Green Mountain and Finger Lakes	NY
Green Mountain and White Mountain National Forests. (Individual, Westfield, NJ - #A13257.10150)	Green Mountain, White Mountain	ME, NH, NY, VT
New England Green Mountains and White Mountain National Forests. (Individual, Concord, MA - #A8094.45622)	Green Mountain, White Mountain	ME, NH, NY, VT
East of the Mississippi . . . On the Hiawatha and Ottawa National Forests, the roadless areas, Fibre and Norwich Plains. (Individual, Marquette, MI - #A22634.45320)	Hiawatha, Ottawa	MI
The Trap Hills in the Ottawa National Forest and Scott's Marsh in the Hiawatha National Forest comprise some of the last remaining roadless areas in Michigan. . . . The Old M-64 Hardwoods timber sale will open access to one of the most sensitive areas in the Trap Hills. . . . Gogebic Ridge. . . . Sand Hill Creek. (Conservation/Preservation Organization, Missoula, MT - #A17234.45622)	Hiawatha, Ottawa	MI
Mogan Ridge is the only inventoried roadless area in the Hoosier. (Individual, Bloomington, IN - #A5335.90520)	Hoosier	IN
Indiana's Hoosier National Forest Deserves Protection . . . All of the roadless areas in the HNF should receive permanent protection as part of the Forest Service roadless area protection initiative. These areas are: Morgan Ridge/Shircliff Hollow Nebo Ridge/Bad Hollow Porter Hollow Deckard Ridge Hickory Ridge Felknor Hollow/Lukes Knob Grodey Ridge/Gobblers Knob S. Fork Beaver Creek Tincher Hollow Tincher Pond Sam's Creek Lick Creek Danner Cemetery Mitchell Creek Jeffries Cemetery Happy Hollow Middle Fork Deer Creek Hemlock Cliffs (Conservation/Preservation Organization, Indianapolis, IN - #A30123.45622)	Hoosier	IN
Missouri . . . wild forest areas in the Mark Twain National Forest. (Individual, Saint Louis, MO - #A21291.45622)	Mark Twain	
Monongahela National Forest in West Virginia. . . Dolly Sods North tract. . . the White Mountain National Forest. . . the Wild River roadless area. (Individual, Durham, NH - #A11683.45622)	Monongahela, White Mountain	NH, ME, WV
Illinois' beloved Shawnee National Forest. (Individual, Chicago, IL - #A5111.70310)	Shawnee	IL
Shawnee NF. (Individual, Aurora, IL - #A916045620)	Shawnee	IL
I urge you to protect Camp Hutchins, Burke Branch, and Ripple Hollow in the Shawnee National Forest as well as all other National Forests throughout our country. (Mike Quigley, Commissioner, Cook County Board of County	Shawnee	IL

Commissioners, Chicago, IL - #A4848.45621)		
Include all Wilderness areas in Illinois Shawnee Forest into the Roadless category, including adding Camp Hutchins. The Camp Hutchins Wilderness area, located in the Shawnee National Forest, currently does not have protection from the Rule. (Conservation/Preservation Organization, Alton, IL - #A13847.45622)	Shawnee	IL
The Superior National Forest in Northern Minnesota. (Individual, Clear Lake, IA - #A8886.45622)	Superior	MN
Boundary Waters Canoe Area of northern Minnesota. (Individual, Nashville, TN - #A12704.10111)	Superior	MN
Boundary Waters (BWCAW) and Quetico Provincial Park. (Individual, Delaware, OH - #A6096.45621)	Superior	MN
Minnesota is threatened by the lifting of the roadless ban on certain forms of logging. On the LaCroix district, the district ranger implemented a timber sale adjacent to a roadless area. . . . The Mississippi Creek area on the Gunflint District . . . areas, such as Cabin Creek and Phantom Lake, are not even wanted for timber production. The Crescent Lake Timber sale, approved last year on the Tofte District, implemented logging in the Brule Lake-Eagle Mountain RARE II area. . . . Kawishiwi Lake area. . . . area around Baldpate Lake. (Conservation/Preservation Organization, Minneapolis, MN - #A7116.45621)	Superior	MN
The value of protecting these special places is real. Here in Minnesota, for example, some of the inventoried roadless areas would, if kept roadless, provide important buffers to the Boundary Waters Canoe Area Wilderness. (Individual, Minneapolis, MN - #A30387.90110)	Superior	MN
New England. . . the WMNF [White Mountain National Forest]. . . land in the Wild River watershed. . . areas around the Caribou-Speckled Wilderness especially the unprotected portion of the valley of the West Branch of Pleasant River . . . the Pemigewasset Wilderness . . . the Sandwich Range Wilderness, the Presidential Range-Dry River Wilderness, the Great Gulf Wilderness, the Kilkenny area . . . Carr Mountain and Kinsman-Gordon Pond. (Individual, Lincoln, NH - #A5640.45624)	White Mountain	NH, ME
New Hampshire's White Mountains. (Individual, Keene, NH - #A5931.45621)	White Mountain	NH, ME
New England White Mts. (Individual, Weston, MA - #A4927.45622)	White Mountain	NH, ME
White Mountains National Forest in Maine and would like to see the Forest protected also. (Individual, Eclectic, AL - #A1390.45621)	White Mountain	NH, ME
I am familiar with the Wild River Roadless Area in the White Mountain Forest. I would like to see it protected under the Roadless Rule. (Individual, Salem, NH - #A8263.45621)	White Mountain	NH, ME
New Hampshire. (Individual, Rindge, NH - #A4812.90130)	White Mountain	NH, ME

**Region 10 Alaska**

Area	National Forest or Grassland	State
Alaska. (Conservation/Preservation Organization, Santa Fe, NM - #A18056.124400)	Multiple	AK
The Alaska National Wildlife Area and the Tongass National Forest. (Individual, Newtown, A - #A19257.45621)	Alaskan National Wildlife Area, Tongass	AK
The Arctic National Wildlife Refuge. (Individual, Evergreen, CO - #A28071.45100)	Arctic National Wildlife Refuge	AK
Chugach National Forest in Alaska. . . . The Nellie Juan Wilderness Study Area, the College Fjord Wilderness Study Area, and especially the Copper River Delta. (Individual, Minneapolis, MN - #A8375.45624)	Chugach	AK
The Kenai Peninsula portion of the Chugach. (Conservation/Preservation	Chugach	AK

Organization, Anchorage, AK - #A17358.90130)		
The eastern Copper River delta. (Conservation/Preservation Organization, Cordova, AK - #A23229.45622)	Chugach	AK
Alaska. (Individual, Anchorage, AK - #A6640.45620)	Chugach, Tongass	AK
Southeast Alaska. (Individual, Juneau, AK - #A17173.90520)	Chugach, Tongass	AK
Protection of the Arctic. (Individual, Lopez Island, WA - #A15240.12120)	Chugach, Tongass	AK
Tongass and Chugach National Forest. (Individual, Juneau, AK - #A11676.45623)	Chugach, Tongass	AK
The western portion of our Chugach National Forest, including all of the Forest located on the Kenai Peninsula. . . . the Prince William Sound portion of the Chugach National Forests and the Tongass National Forest. (Conservation/Preservation Organization, Anchorage, AK - #A17358.45622)	Chugach, Tongass	AK
In the Tongass Forest, the Gravinas Forest, and the magnificent Chugach National Forests, or the beautiful Northwest Pacific Forests! (Individual, Melvindale, MI - #A30286.45622)	Chugach, Tongass	AK
An area in particular need of protection is the Tongass National Forest. . . . the Tracy Arm/Ford's Terror Wilderness Area. (Individual, No Address - #A2542845621)	Tongass	AK
Chugach and Tongass Nat. Forest. (Individual, Chugiak, AK - #A24467.45622)	Tongass	AK
In the Tongass National Forest, I urge roadless status for Berners Bay and other mainland areas north to the Chilkat Peninsula. (Individual, Anchorage, AK - #A30607.45621)	Tongass	AK
Protecting all roadless wildlands on the Tongass under the roadless policy would prevent costly and environmentally damaging state highway construction proposals. Instead of investing limited resources into construction of roads like those up the rugged Lynn Canal from Juneau to Skagway, from Sitka to Baranof Warm Springs, across the Cleveland Peninsula, or up the Bradfield Canal to Canada, devote those scarce funds to improving the most natural and cost-effective transportation route in Southeast Alaska-the Alaska Marine Highway System. (Conservation/Preservation Organization, Juneau, AK - #A23091.90120)	Tongass	AK
Specific named areas in the Sitka Subsistence Use region are: Lisa Creek Watershed (adjacent to Katlion Native logging), Kvuzof Island compiles, Hoonah Sound watershed, Ushk Bay-poison Cove, and Northwest Baronof Planning Area. (Individual, Sitka, AK - #A1056.12440)	Tongass	AK
Areas like . . . Chicken Creek . . . Cowee Creek . (Conservation/Preservation Organization, Port Alexander, AK - #A17301.45100)	Tongass	AK
Inventoried roadless areas on the Tongass, including . . . Bostwick Inlet and Creek on Gravina Island next to Ketchikan. (Individual, Cambridge, MA - #A19185.90520)	Tongass	AK
The Tongass National Forest. (Individual, Juneau, AK - #A1159.10150)	Tongass	AK
Native University of Alaska, and Mental Health Trust land grants. (Individual, Sitka, AK - #A1056.90522)	Tongass	AK
The Taku River, and the Juneau-Skagway roads. (Individual, Juneau, AK - #A13516.45614)	Tongass	AK
Tongass National Forest areas: The entirety of Sweetwater-Honker Divide, and Upper Duncan Canal (these have had to wait for too long!), East Kuiu Island (including Reid, Alvin, and No Name Bays, and Seclusion Harbor), portions of Tenakee Inlet (including Little Seal Creek and Crab Bay and areas between Goose Flats and Long Bay as well as Saltery Bay), Saltery and Sunny Coves and Clover Bay on east Prince of Wales Island, Cape Fanshaw and Farragut Bay on the mainland near Petersburg, North Cholmondeley, Moira Sound on the east side of Prince of Wales Island, Little Seal Bay, Emerald Bay on the Cleveland Peninsula north of Ketchikan, Davies Creek, Upper Lynn Canal, St. James Bay south to Pt. Couverden on the	Tongass	AK

Chilkat Peninsula, Taku Inlet and Harbor (and Windham Head) near Juneau, the area around Port Alexander, Baby Bear Bay, Totem and Douglas Bays on Kupreanof Island, Woewodski Island in Wrangell Narrows, Crittenden Creek on the mainland near Wrangell, Virginia Lake and Creek near Wrangell. (Individual, Minneapolis, MN - #A8375.45623)		
[Footnote 1: Other areas of special interest protected in the final 1999 TLMP decision include Calder-Holbrook/Mt. Francis, East Saook Bay, Salmon Bay Lake watershed, Keete, Mabel, Kassa Inlets and Nutkwa, Southeast Mitkof, Sukkwan Island, Poison Cove, Deep Bay, Broad Finger and Broad Creeks, Crab Bay, Northwest Dall Island, East Port Camden, Southeast Rocky Pass and Kushneahin Creek.]. . . 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; Emerald Bay on the Cleveland Peninsula; St. James Bay and Pt. Couverden near Juneau; Baby Bear Bay near Sitka; Woewodski Island near Petersburg; Canal and Hoya Creeks next to the Anan Bear Observatory; Whales Tail on Etolin Island; Virginia Lake and Mill Creek near Wrangell; Bostwick Bay and Creek on Gravina Island, and Neka Mountain near Hoonah. These areas should be protected under the roadless policy. (Conservation/Preservation Organization, Juneau, AK - #A23091.45622)	Tongass	AK
Some of these areas include: Ushk Bay, Castle River, East Kuin, Poison Cove, Deep Bay, Port Houghton, NW Dall Island, Cleveland Peninsula, Upper Tenakee Inlet . . . I urge you to protect the following important community use areas, roadless areas, (and ALL roadless areas in forests across the U.S.) in the Tongass National Forest: Moira Sound, Canal and Hoya Creeks, Whale's Tail (Etolin Island), Crittenden Creek, Woewodski Island, Saltery Cover, Taku Inlet/Harbor, Windham Head, St. James Bay, Pt. Couverden, Upper Lynn Canal, along with the above-named areas in the Tongass Land Management Plan protected in 1999. (Individual, Douglas, AK - #A13359.45624)	Tongass	AK
The Alexander Archipelago (Tongass N.F. plus native corp. lands). (Individual, Klawock, AK- #A12005.45623)	Tongass	AK
Roadless areas, including St. John the Baptist Bay, Schulze Cove. (Individual, Sitka, AK - #A15506.45326)	Tongass	AK
The Tongass National Forest, <b>Sky Lakes Wilderness</b> . (Individual, Klamath Falls, OR - #A11704.45620)	Tongass	AK
Roadless Areas of the Tongass National Forest. . . . Prince of Wales Island's remaining wild lands. . . . Local Roadless Areas that would have been protected under the 1999 TLMP now at risk include: Salmon Bay Lake; Calder-Holbrook; Honker Divide; Moira Sound; Cholmondeley Sound; NW Dahl Sound; Sukkwan Island and; Kette Inlet, Hassia Inlet, Mabel Bay and Kassa Inlet. (Conservation/Preservation Organization, Craig, AK - #A23228.45621)	Tongass	AK
Dall Island . . . Kuiu Island. (Individual, Haines, AK - #A6161.45621)	Tongass	AK
Saook Bay in Peril Strait. (Individual, Cambridge, MA - #A19185.10155)	Tongass	AK
Three-Mile on Kuiu Island Moira Sound and Cholmondeley on Prince of Wales Island Finger Mountain on Chichagof Island Cape Fanshaw on the mainland coast. Douglas on Kupreanof Island. (Conservation/Preservation Organization, Sitka, AK - #A12003.45511)	Tongass	AK
Finger Mountain sale in Tenakee Inlet. . . . The area in Goos River. (Individual,	Tongass	AK

Tenakee Springs, AK - #A5143.53100)		
Southeast Alaska. . . . Elfin Cove on the north end of Chichagof Island. (Individual, Kenmore, WA - #A6023.45621)	Tongass	AK
Inventoried roadless areas, including: #311 Chichagof, #321 Tenakee Ridge, #323 Game Creek, and #312 Trap Bay. (Vicki Wisenbaugh, City Council President, City of Tenakee Springs, Tenakee Springs, AK - #A3358.45621)	Tongass	AK
The Gravina Island Timber Sale. . . . the pristine 37,000-acre Gravina Roadless area. (Individual, San Diego, CA - #A1740.45620)	Tongass	AK
The Cleveland Peninsula . . . forest areas around Ketchikan. . . . It was extremely disturbing in the late '70s when a road was punched through from Rowan Bay on west-side of the island. This road removed Kadake Creek and the bay at its mouth which is directly across from Kake from roadless and wilderness consideration. Most of the West Side of Kuiu. . . . the Castle River on Kupreanoff Island. . . . the Peril Strait area. (Individual, Juneau, AK - #A10588.45621)	Tongass	AK
We request that all roadless areas of national forest land on Admiralty Island, including but not limited to the Mansfield Peninsula on the north end of the island, remain roadless under the Roadless Conservation Rule (Conservation/Preservation Organization, Auke Bay, AK - #A23611.45611)	Tongass	AK
Remote areas of Chichigof, Buranof and Admiralty Islands should remain roadless. (Individual, Juneau, AK - #A23200.45621)	Tongass	AK

**Table F-2. Site-Specific Requests that Areas be Exempted from National Roadless Area Protection****Region 1 Northern**

Area	National Forest or Grassland	State
9 million Idaho acres. (Individual, Lewiston, ID - #A30037.45611)	Multiple	ID
Montana. (Individual, No Address - #A16310.90320)	Multiple	MT
Williston Basin is a natural gas transporter, operating storage fields and over 3000 mile of pipelines throughout its traditional service territory in Montana, Wyoming, North Dakota and South Dakota. Williston has operated a transmission pipeline crossing the Little Missouri National Grasslands in North Dakota since 1930. . . . reconsider implementing this rule or exempt pipeline transportation and oil and gas development from the Roadless Initiative. (Oil, Natural Gas, Coal, or Pipeline Industry, No Address - #A29748.45610)	Multiple	MT, ND, SD, WY
Lands in North Dakota. (Range/Grazing Organization, Denver, CO - #A21358.45618)	Multiple	ND
North Dakota . . . the National Grasslands . . . western and central North Dakota. (Range/Grazing Organization, Denver, CO - #A21358.10130)	Multiple	ND
The National Grasslands and North Dakota. (Dale Patten, Commissioner, McKenzie County Board of Commissioners, Watford City, ND - #A27737.45611)	Multiple	ND
Exempt Wyoming. (Timber or Wood Products Industry/Association, Cody, WY - #A19163.45611)	Multiple	WY
The areas I am referring to are in the Tobacco Root Range and Gravelly Range areas of the Beaverhead-Deerlodge forest. . . . the Tobacco Root mountains, the Wisconsin Creek, Indian Creek, and Mill Creek . . . the Gravelly Mountains. (Individual, Tustin, CA - #A20777.45512)	Beaverhead-Deerlodge	MT
The Flathead National Forest. (Individual, Kalispell, MT- #A29631.45612)	Flathead	MT
Forest Service lands within the Little Missouri National Grasslands. (Oil, Natural Gas, Coal, or Pipeline Industry, No Address - #A29748.45610)	Little Missouri National Grasslands	ND

We don't need or want any roadless areas on the Cheyenne Grasslands. (Individual, Sheldon, ID - #A22622.45611)	Cheyenne National Grasslands	ND
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**Region 2 Rocky Mountain**

Area	National Forest or Grassland	State
The National Forest lands within the State of Wyoming. . . . I will further state that at least on the Bridger-Teton National Forest, there are several supposed roadless areas which have roads in them that have been in place for 40 years or more. (Individual, Jackson, WY - #A29348.45611)	Multiple	WY
<b>Reasons why public access to Flat Top Mountain area should be maintained at the present level.</b> 1. FR 829 is utilized by ranchers for extensive grazing on their private lands and I suspect on leased public lands above. 2. The land has a silent beauty with vistas of the West Elk area, Fossil Ridge and Elk Mountains. The sunsets are spectacular. 3. The roads are well used, well maintained, free from erosion, unlittered, and controlled by gates and fences. 4. The area has moderate use by hunters and exclusion of this area would decrease Colorado Game Management Unit's size by about 50%, increasing pressure on other areas. 5. The area is primarily sage with some stands of conifers at higher elevations. The land is clean, free of erosion, shows no signs of scarring by illegal off road travel. 6. The area is relatively close to residential areas of Gunnison and is convenient for short visits decreasing pressure on more heavily traveled recreational areas. 7. FR 829 and FR 863 have been in use for many years, are well established and maintained, and are well marked on USFS maps. This area would not appear to fit the definition of roadless in various USDA Forest Service communications. 8. Arbitrary denial of access to this area would be a great loss to this group and to me personally as it is one of the few areas close to our home where participation in high country activities (camping, bird watching, game viewing) is possible for someone with mobility problems. (Individual, Littleton, CO - #A13845.91110)	Arapaho-Roosevelt	CO
The Flat Top Mountain area . . . FR 829 and FR 863. (Individual, Littleton, CO - #A13845.91110)	Arapaho-Roosevelt	CO
I believe that presently the Western Unites States, Colorado, and Larimer County has more than enough federal lands set aside in roadless parks and wilderness areas. (Tom Bender, Commissioner, Larimer County Board of Commissioners, No Address - #A19772.45341)	Arapaho-Roosevelt	CO
I feel that the Black Hills should be exempt from the roadless rule. (Individual, Moorcroft, WY - #A40541.45612)	Black Hills	SD, WY
During the forest plan revision process on the Black Hills National Forest, forest resources were carefully evaluated and no new areas were deemed qualified for roadless status. However, according to the roadless rule, the Inyan Kara and Sand Creek areas were designated as having roadless characteristics. We strongly support the local forest decision, and urge the removal of those two areas from roadless designation. (Mark Semlek, Chairperson, Crook County Board of Commissioners, Sundance, WY - #A15545.45611)	Black Hills	SD, WY
The Castle Peak area. (Individual, No Address - #A889.90320)	Gunnison	CO
Medicine Bow National Forest. (Business, Cheyenne, WY - #A20917.90000)	Medicine Bow-Rouff	CO, WY
The WRNF (White River) in Colorado. (Individual, Snowmass Village, CO - #A8329.90320)	White River	CO
An approximately 6,000 acre roadless area along the western boundary of the Vail (Mountain) Resort special use permit area known as South Game Creek.	White River	CO

(Special Use Permit Holder, Avon, CO - #A28852.45614)		
Inventoried roadless area in the WRNF in Eagle County, Colorado adjacent to the western boundary of the Beaver Creek Resort special use permit area known as McCoy Park. (Special Use Permit Holder, Avon, CO - #A28852.45617)	White River	CO

**Region 3 Southwestern**

Area	National Forest or Grassland	State
Arizona State Trust lands located within and near the local forests. (Michael E. Anable, Commissioner, Arizona State Land Department, Phoenix, AZ - #A17678.91110)	Multiple	AZ
The Pecos area . . . areas of the high forest in New Mexico. (Individual, No Address - #A5360.90000)	Multiple	NM
Carson National Forest Plan concerning Sipapu Ski Area. . . . counties in northern New Mexico. (Special Use Permit Holder, Vadito, NM - #A28970.45624)	Carson	NM
Sipapu Ski Area. . . . Taos and Mora counties. (Special Use Permit Holder, Vadito, NM - #A28970.45624)	Carson	NM
The Roadless Area Initiative has been said to be insignificant on the Cibola and Gila national forests in terms of total acres to be withdrawn from multiple use. In fact the Forest Service proposed Roadless designations in Catron County are significant for several reasons. The national forest non-multiples use (Roadless, wilderness, protected threatened and endangered species) areas in Catron County already consume well over half of the national forests in the County. The net consequences could result in less than 20% of the National Forest remaining accessible to multiple use, the statutorily mandated land use for national forests. Catron County and southern New Mexico is a fast growing region of the southwest. People who live and move into this region utilize the multiple uses of the national forest-the very forests that are proposed to be withdrawn. The existing Cibola and Gila national forest roads provide a vital service to our citizens and visitors who travel through the national forest by vehicle. The number one recreation activity on these forests is vehicular driving through the forest on dirt roads. It provides the most important recreation activity, driving through the national forest. Families, sportsmen, and a growing retirement and elderly population can only fully enjoy the national forest through vehicle access. (see Forest Service report: <i>Gila National Forest Recreation Market Study</i> , by Dr. Alexander J. Thal, Western New Mexico University). Timber harvests (fuel wood gathering and timber operations) have been a vital part of Catron County’s customs, cultures, and economy. The impact of the Roadless Area Initiative has yet to be determined, but its impact on future fuel wood gathering and any timber production could be significant, because it could lock up more of the forests, resulting in less than 20% of the remaining non-wilderness areas left for multiple use and future timber production in Catron County. Many of the roads used by woodcutters in the national forest could be excluded from vehicle use. (Auggie Shellhorn, Chairperson, Catron County Board of Commissioners, Reserve, NM - #A15538.45611)	Cibola, Gila	NM
The Roadless Area Initiative has been said to be insignificant on the Gila National Forest in terms of total acres to be withdrawn from multiple use. In fact the Forest Service proposed Roadless designations in Sierra County are significant for several reasons. The national forest non-multiples use (Roadless, wilderness, protected threatened and endangered species) areas in Sierra County already consume well over half of the national forest in the County. The net consequences of this current roadless initiative could result in less than 20% of the national forest remaining accessible to multiple use, the statutorily mandated	Gila	NM

<p>land use for national forests. Sierra County and southern New Mexico is a fast growing region of the southwest. People who live and move into this region utilize the multiple uses of the national forest - the very forests that are proposed to be withdrawn. (Adam Polley, Manager, Sierra County, Truth or Consequences, NM - #A22059.45622)</p>		
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**Region 4 Intermountain**

Area	National Forest or Grassland	State
<p>Idaho. (Individual, Elk City, ID - #A4283.90320)</p>	<p>Multiple</p>	<p>ID</p>
<p>Forests in southwest central Idaho. (Individual, No Address - #A1036.91110)</p>	<p>Multiple</p>	<p>ID</p>
<p>Over 9 million Idaho acres into the Roadless classification. (Individual, Lewiston, ID - #A30037.45611)</p>	<p>Multiple</p>	<p>ID</p>
<p>The public lands of Nevada. (Individual, Gerlach, NV - #A1066.91110)</p>	<p>Multiple</p>	<p>NV</p>
<p>Forest Service lands in Nevada. (Mining Industry/Association, Reno, NV - #A15364.90710)</p>	<p>Multiple</p>	<p>NV</p>
<p>Lander County remains strongly opposed to roadless area designations on National Forest Lands in Nevada and throughout the County. (Mickey Yarbrow, Chairperson, Lander County Board of Commissioners, Battle Mountain, NV - #A27730.45611)</p>	<p>Multiple</p>	<p>NV</p>
<p>Rural Utah. (Individual, No Address - #A340.90100)</p>	<p>Multiple</p>	<p>UT</p>
<p>The State of Wyoming. (Timber or Wood Products Industry/Association, Cody, WY - #A19163.45611)</p>	<p>Multiple</p>	<p>WY</p>
<p>The Manti LaSal National Forest. (Individual, Manti, UT - #A20336.90320)</p>	<p>Manti-La Sal</p>	<p>UT</p>
<p>I believe the entire area immediately East of Ogden, Utah has been inaccurately inventoried as Roadless. There are a number of current and future roads that are now, or soon will need to be, located in this area.                      Even if boundary adjustments could be made to exclude these existing and future roads from what is being called the Burch Creek Roadless Area, I believe the resulting area, (sandwiched by private mountain land on the North, developed ski resort land on the East, Ogden City on the West, and Interstate 84 on the South,) is too small to have the characteristics that are desirable in a roadless area. With roads, mountain bike trails, ski runs, ski race buildings and mountain restaurants at the upper fringes of the Burch, Beus, Strongs, Malans and Taylor drainages and with city streets and homes less than 3 miles away on the lower fringes, a roadless designation seems to invite unnecessary conflicts with the adjoining high-density recreation and urban uses. To effectively administer this land, I believe the Ogden Ranger District should have at its disposal the full range of National Forest uses without the strictures imposed by a roadless designation. Current roads in the inventoried Burch Creek roadless area, as mapped on the FS website:                      1) The road to the Mt. Ogden Telecommunications site in Section 6 of Township 5 North, Range 1 East, Salt Lake Base and Meridian                      2) The road and ski run at the top of Burch Bowl between DeMoisy Peak and Strawberry Peak in Section 8 of Township 5 North, Range 1 East, Salt Lake Base and Meridian                      New road needed in the inventoried roadless area:                      1) a skier trail from the top of Snowbasin Resort's Strawberry Gondola north into Middle bowl. This skier road will improve skier egress from Strawberry Bowl at the end of the day, and when this road is built, it will allow the current, above ground high voltage electric line (from the top of the Mid Bowl Gondola to the top of the Strawberry Gondola) to be buried. This path is now used extensively by skiers taking the shortcut from Strawberry to Middle Bowl, resulting in a hazard as metal ski and snowboard edges cut through the insulation on the high-voltage line. A bigger hazard of not having this road (and accompanying</p>	<p>Wasatch-Cache</p>	<p>UT</p>

<p>underground power line) is that avalanche control charges are exploded in close proximity to the surface-power line. An unlucky avalanche charge could cut off power to the Strawberry Gondola for weeks if not months.                  Given the two existing roads in this “roadless” area, and the need for a third, I respectfully request that the Burch Creek Roadless area near Ogden, Utah be deleted from the map of inventoried roadless areas. (Individual, Ogden, UT - #A30540.45510)</p>		
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**Region 5 Pacific Southwest**

Area	National Forest or Grassland	State
<p>The Cascade-Siskiyou National monument in southern Oregon is of great concern to the citizens of Jackson County and affected adjacent areas. We support the Jackson County Commissioners and their recommendation to reduce the monument to include only federal land in solid block ownership of approximately 16,500 acres. Boundary description – East boundary of Wilderness Study Area; West boundary Hwy 99; South boundary Oregon/California state line; North boundary south of Soda Mountain (known as Alternative B Minus). There is broad base support to eliminate this monument to protect private property rights and maintain Multiple-Use and Management. (Individual, Watsonville, CA - #A20403.45621)</p>	<p>Cascade-Siskiyou National Monument</p>	<p>OR</p>
<p>Sage Road in Laguna Mountains, San Diego. (Individual, San Diego, CA - #A12279.91110)</p>	<p>Cleveland</p>	<p>CA</p>
<p>A further remedy would be to include in any action or decision an exemption excluding all lands in the National Forest system, and as to MMSA [Mammoth Mountain Ski Area], those areas within the INF, previously identified for resort or recreation site development or expansion from consideration in the Roadless Initiative. This would include all lands within the SUP boundaries of MMSA, those identified in master development plans, those lands designated in forest plans for potential ski area development, and Management Prescriptions 13 and 14 in the INF Forest Plan. (Special Use Permit Holder, Mammoth Lakes CA - #A21901.45620)</p>	<p>Inyo</p>	<p>CA</p>
<p>It appears that the following areas are proposed to be included and subjected to the Roadless Area rules:                  Section 8, Township 12 North, Range 19 East, Mt. Diablo Base &amp; 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.                  The lands proposed for inclusion lie immediately adjacent to the 4,500 acres of land presently under Term Special Use Permits to Heavenly (permits #4056/01 and #4056/02), or adjacent to private held lands which Heavenly owns or controls. In fact, the entire area of Section 7 is already within Heavenly’s Special Use Permit boundary and is used for downhill skiing.                  . . . Inclusion of these areas within Heavenly’s Special Use Permit boundary (i.e., not subject to the proposed Roadless Area rules) would allow a continuous connection to be developed between a potential base area 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. The ability for the public to access the resort in this manner ensures that the Forest Service and Heavenly will continue to provide a high-quality public outdoor recreational experience, and, that transportation impacts to the existing road network, particularly those on the Kingsbury Grade and in the Lake Tahoe Basin are minimized by providing public access at the bottom of the hill and then transporting visitors onto national forest lands using ropeway forms of transportation. (Special Use Permit Holder, Stateline, NV - #A21708.45617)</p>	<p>Humboldt-Toiyabe, Lake Tahoe Basin Management Unit</p>	<p>CA, NV</p>

<p>Changes to rules that affect forest plan directives should seek to maintain the environmental and economic balance.</p> <p>The local forest plans in Mono and Inyo counties include consideration of local general plans. These plans were not consulted last year in the development of the roadless rule. As an example, it appears that the roadless rule would preclude development of the Sherwin Bowl Ski Area, which is a major development component of the Town of Mammoth Lake General Plan. It also appears that the rule would preclude expansions of the June Mountain Ski Area, which is contrary to the June Lake Area Plan of Mono County. (Byng Hunt, Chairperson, Mono County Board of Supervisors, Bridgeport, CA - #A18107.13110)</p>	<p>Inyo</p>	<p>CA</p>
<p>I own several parcels of land located in the Raywood Flat Area shown on the San Bernardino National Forest Inventoried Roadless Map in the far east part of Area #62 known as Raywood Flat "B". I have several structures located on my land and lease Snow Peak, which is located on the southern highest point in Section 31 T1S R2E SBBM to a communication company known as Snow Peak Communication. They have installed substantial improvements and equipment on this site since the early 1960s and service over (30) government agencies, private companies and individuals. The access to my properties is through a road known as Forestry #2S01 or Banning Canyon Rd &amp; Raywood Flat Rd. The road has existed in some form or another since the late 1800s when the area was settled. . .</p> <p>Other problems stem from inaccurate site specific studies of the area, the description in the above mentioned book on page C-26 (Exhibit "A"), it does not describe the two diversion dams at South &amp; East Fork of the Whitewater River providing water through a 7 1/4 mile flume and 2 1/2 mile penstock for the Banning Heights Water Company &amp; the City of Banning Water Supply. Also missing is the Riverside Flood Control District's weather measuring equipment and a state seismic monitoring station located at Raywood Flat on Section 31 and additionally missing is two Radio Facilities one on Snow Peak in Section 31 the other in the southwestern area of Section 21 T1S R1E SBBM near Little San Gorgonio Peak.</p> <p>I am very concerned that creating this roadless area in an area with many improvements and so much private land is just wrong and bad planning. It is clear that the original Rare II studies missed a lot of improvement and it still concluded that it did not meet roadless area inventory criteria. I am requesting to have the entire Sections 36 T1S R1E SBBM &amp; 30 T1S R2E SBBM &amp; the southwestern portion of Section 19T1S R2E SBBM that is not in wilderness, removed from the proposed roadless area. Also to substantially buffer the roads, flumes and penstock in Sections 1, 2 &amp; 3 T2S R1E SBBM by at least 1/8 mile on each side of the roads, flumes and penstock centerline from the proposed roadless area. (Individual, Encinitas, CA - #A20826.45614)</p>	<p>San Bernardino</p>	<p>CA</p>
<p>The economy on the Banning Bench has developed on the basis of the water provided by the water flume and depends on the continued availability of this water. The flume, in turn, depends on the Raywood Flat and Banning Canyon Roads for its continued existence. Designating Raywood Flat Area A &amp; B (#61 and #62) of the San Bernardino National forest to be a Roadless Area would effectively lead to the termination of the Banning Bench water supply by blocking the vehicular necessary for the continued maintenance of the flume. . . . we urge the Secretary <u>not</u> to declare these areas to be Roadless. (Utility Group/Organization, Costa Mesa, CA - #A20854.45611)</p>	<p>San Bernardino</p>	<p>CA</p>
<p>The Raywood Flat Rd. &amp; Banning Canyon Rd are shown on existing Forestry Maps to be partially cherry stemmed from the proposed Roadless Area, but this is not enough. All the roads along with the entire water conveyance system needs to be removed from the Roadless Area starting from Banning Heights Water Tank at Pine Powerhouse all the way up to the diversion Dam at East Fork of the whitewater River. (Individual, Banning, CA - #A17655.45611)</p>	<p>San Bernardino</p>	<p>CA</p>

<p>I am sending you this letter on behalf of the Company’s Board of Directors in order to address the proposed “Roadless” designation of the Raywood Flat Area A &amp; B (#61 and #62) of the San Bernardino National Forest in Southern California. Such a designation would impact the Raywood Flat and Banning Canyon Roads, in the counties of Riverside and San Bernardino, roads that are essential for maintaining BHMWC’s [Banning Heights Mutual Water Company] water conveyance system that diverts water from the Whitewater River watershed to the Banning Bench area adjacent to the San Gorgonio River. The Raywood Flat and the Banning Canyon Roads are used to access and service the water conveyance system that provides water to Banning Bench, a community of some 600 residents served by BHMWC, and the City of Banning (the “City” [pop. 26,000]) and also provides the hydro power for the Southern California Edison (“SCE”) San Gorgonio #1 and #2 hydroelectric project. The system included two diversion dams, two power houses, water tanks, and an approximately 14 mile long water flume. . . .</p> <p>Designating Raywood Flat Area A and Area B as a Roadless Area would seriously impair these “key principles” by not allowing for road maintenance and repairs that are periodically needed in order to enable BHMWC, the City, and SCE to have access Project 344. (Utility Group/Organization, Orange, CA - #A20944.45614)</p>	<p>San Bernardino</p>	<p>CA</p>
<p>I am sending you this letter on behalf of the City of Banning in order to address the matter of the proposed ‘Roadless’ designation for Raywood Flat Area A and Area B (#61 and #62).</p> <p>The Raywood Flat and the Banning Canyon roads in the counties of Riverside and San Bernardino, California, are used to access and service an approximately 14 mile long water conveyance system that provides water to residents of Banning Bench and the City and also provides the hydro power for the Southern California Edison (“SCE”) San Gorgonio #1 and #2 hydroelectric project. The system includes two diversion dams, two powerhouses, water tanks, and a long water flume conveyance system. Historical records indicate that the original flume was constructed of wood around 1877 to provide water to the early settlers in the region, and that the current concrete flume was constructed around 1910 to provide water and generate hydroelectric power. The system is referred to by the Federal Energy Regulatory Commission (FERC) as “Project 344,” and SCE holds a FERC license to operate it for power generation.</p> <p>Some 75 years ago, the State of California adjudicated the right of the Banning Heights Mutual Water Company (“BHMWC”) and the City to divert and use the water that generates power for Project 344. The adjudicated right to divert water that BHMWC and the City hold to is very significant indeed: approximately 9,500 acre/feet per year from the whitewater River. Banning Bench, a community of some 600 residents served by BHMWC, has been almost entirely dependent on this water supply for nearly a century. Use of this water by the residents of the City (pop. 26,000) goes back at least that far. Moreover, for more than a century, the City, SCE, and BHMWC have used the roads in this area to operate, maintain and repair the flume system.</p> <p>Designating Raywood Flat Area A and Area B as a Roadless Area, would seriously endanger BHMWC’s and the City’s water supply by not allowing for the road maintenance and repairs that are periodically needed in order to enable BHMWC, the City, and SCE to have access to Project 344. Including these areas in the Roadless Area designation would only lead to inevitable problems, as the Forest Service will most likely maintain that special permission is thereafter required to repair and maintain the existing roads, and the City will out of necessity, respond by asserting its various rights to this essential right-of-way as were granted by 19th Century Federal Law. The upshot will be costly and potentially cause long delays for essential repairs to the diversion dams and water conveyance system that our community depends on.</p>	<p>San Bernardino</p>	<p>CA</p>

As to Raywood Flat B, the “Appendices” to the <i>San Bernardino National Forest Land and Resource Management Plan</i> acknowledged that further restrictive designation is not warranted. (Don Foster, City Manager, City of Banning, Banning, CA - #A20958.51210)		
The Raywood Flat Road and Banning Canyon Road are shown on existing Forestry maps to be partially excluded from the proposed Roadless Area, but this is not enough. All of the roads along with the entire water conveyance system need to be excluded from the Roadless Area, starting from the Banning Heights Water Tank at Pine Powerhouse all the way up to the Diversion Dam at the East Fork of the Whitewater River. The best approach is simply not to include in the Roadless Area any of the Sections of land that contain any roads or improvements on them or provide access to portions of the water conveyance system. (Don Foster, City Manager, City of Banning, Banning, CA - #A20958.45610)	San Bernardino	CA
Areas in the Tahoe National Forest . . . the American River Canyon. (Individual, No Address - #A16447.90510)	Tahoe	CA
The Pamamint Valley area of California. (Individual, Ratcliff, AR - #A8877.90100)	Unknown	CA

**Region 6 Pacific Northwest**

Area	National Forest or Grassland	State
Lands within the Interior Columbia Basin project area. (Grant County Attorney’s Office, Grant County, Roseburg, OR - #A17667.45611)	Multiple	ID, OR, MT, NV, WA, WY
We recommend that all of Oregon be deleted from the proposal. (Grant County Attorney’s Office, Grant County, Roseburg, OR - #A17667.45611)	Multiple	OR
Under the interim rule that suspended road building, the agency exempted Northwest Forest Plan (NFP) forests because of the scientific input gathered during the ecosystem management assessment team process (begun in 1993). . . . exempt the forests covered by the NFP from any future roadless conservation rule. (Special Use Permit Holder, Hood River, OR - #A13230.45610)	Multiple	OR, WA
I do <u>NOT</u> agree with setting aside over 2 million acres in Washington State as roadless. (Individual, No Address - #A6768.45611)	Multiple	WA
Mt. Baker/Snoqualmie N.F. (Individual, Lake Stevens, WA - #A8688.45612)	Mt. Baker-Snoqualmie	WA
Pelican Butte. (Individual, Klamath Falls, OR - #A6931.90810)	Winema	OR

**Region 8 Southern**

Area	National Forest or Grassland	State
We generally are opposed to any rule or regulation that will cause delays in the construction of highways in National Forest System land in West Virginia. Charleston, WV - #A18100.90120)	Multiple	WV
The Chattahoochee and Nantahala National Forests and Black Rock Mountain State Park (GA) . . . the Chattahoochee National Forest in northeast Georgia. (Individual, Crystal River, FL - #A6257.91110)	Chattahoochee-Oconee, Nantahala	GA, NC, TN
I find the current Roadless exercise in Wisconsin to be of little value since all 15 inventoried parcels were rejected for US Federal Wilderness in 1984. I also note that 9 of the 15 USFS parcels are zoned semi-primitive motorized since	Chequamegon-Nicolet	WI

important winter corridor snowmobile trails have been on these parcels from 20 to 30 years. (Individual, Thiensville, WI - #A28617.45611)		
Wisconsin’s Department of Natural Resources recommends that the rule not be implemented as drafted. The Department is in favor of protecting and managing roadless areas as a component of the National Forest system. There are sensitive and unique areas in Wisconsin that could benefit from more road exclusion or limited road access but they should be identified and managed based on current ecological, economic and social values specific to each site. (Wisconsin Department of Natural Resources, Madison, WI - #A28775.45611)	Chequamegon-Nicolet	WI
Hiawatha National Forest. (Individual, Christmas, MI - #A6694.45611)	Hiawatha	MI
The Shawnee National Forest . . . old roads and trails in the Hoosier National Forest and the James D Wilderness in Indiana. (Individual, 22318.45611)	Hoosier, Shawnee	IL, IN
Our major concern lies with the decisions that affect the White Mountain National Forest that occupies approximately thirteen percent of the State of New Hampshire. We see an annual a loss of about twenty thousand acres of forest and field to development across the State. As this trend continues there is an ever increasing demand for outdoor recreational activities, including hunting and fishing on our public lands. There is a simultaneous effort on the part of some individuals and groups to reduce the opportunity for quality hunting or related wildlife enjoyment be removing the opportunity to manage vegetation in a way that enhances habitat quality for a majority of the game and non-game species found in New Hampshire and in the White Mountains. Over fifty percent of the White Mountain National Forest, under its current management plan, has been withdrawn from vegetative management. The roadless areas designation process has the potential to significantly increase that percentage as part of the current revision process. It is imperative that the ability to manage habitat through the use of commercial timber sales and through non-commercial applications be retained on these lands if the future needs of the wildlife enthusiasts in New Hampshire are to be met. (New Hampshire Department of Fish and Game, Concord, NH - #A28779.45612)	White Mountain	NH, ME

**Region 9 Eastern**

Area	National Forest or Grassland	State
Central New York State and New England. (Individual, Syracuse, NY - #A345.91110)	Multiple	NY
Allegheny National Forest. (Individual, Warren, PA - #A8840.10112)	Allegheny	PA
In the Chequamegon or Nicolet National Forests in Wisconsin, Black Hills in South Dakota, Pike National. (Individual, Waupaca, WI - #A6712.90100)	Black Hills, Chequamegon-Nicolet, Pike	SD, WI
Chippewa and Superior National Forests. (Tom Saxhaug, Chairperson, Itasca County Board of Commissioners, Grand Rapids, MN - #A2561.90100)	Chippewa, Superior	MN
In Lake County, Minnesota, we have the Boundary Waters Canoe Area Wilderness that comprises 26% of our county’s land base. In addition, there are also many PRNAs, RNAs, SMCs, Rare II areas, SNAs, reserve areas and state parks. The roadless area designation for additional lands in Lake County and Northeastern Minnesota will create more problems, for now and in the future, by greatly limiting access to public lands for necessary land management activities by the Forest Service, state and county agencies and private landowners. (Thomas C. Martinson, Commissioner, Lake County Board of County Commissioners, Two Harbors, MN - #A15552.30100)	Chippewa, Superior	MN
On the Shawnee NF in Southern Illinois. (Multiple Use/Wise Use/Land Rights Organization, Three Rivers, CA - #A28739.90410)	Shawnee	IL
Southeastern Ohio. (Individual, Albany, OH - #A4442.45620)	Wayne	OH

White Mountain National Forest. (Timber or Wood Products Industry/Association, Farmington, ME - #A15463.90515)	White Mountain	NH, ME
Central New Hampshire . . . White Mountain National Forest. (Individual, Center Sandwich, NH - #A8347.90120)	White Mountains	NH, ME

**Region 10 Alaska**

Area	National Forest or Grassland	State
Exempt Kenai Peninsula. (Individual, No Address - #A6800.30420)	Chugach	AK
Alaska. (Individual, Anchorage, AK - #A15680.45610)	Chugach, Tongass	AK
The Tongass and Chugach. (Individual, Juneau, AK- #A17238.45610)	Chugach, Tongass	AK

**Table F-3. Site-Specific Requests that areas be Recommended/Designated as Wilderness**

Area	National Forest or Grassland	State
All roadless areas including those encompassed in the Northern Rockies Ecosystem Protection Act to and including, one thousands acres in size should be protected to preserve their wilderness character and eligibility for congressional Wilderness designation, rather than being deferred later to the forest planning process. (Individual, Elmhurst, IL - #A15290.45320)	Multiple	ID, MT, WY
I'm looking to you to <u>save</u> wilderness areas in the Yellowstone region. (Individual, Corte Madera, CA - #A10851.45621)	Multiple	ID, MT, WY
By law, new wilderness area recommendations must be proposed by the Forest Service to Congress during the forest plan revision process for possible new wilderness legislation. The 1.9 million acres of inventoried roadless areas in Oregon, plus the remaining 2.9 million acres of unprotected roadless areas on Forest Service and BLM lands should be designated as wilderness through a comprehensive statewide forest wilderness bill. (Individual, Blue Lake, CA - #A3671.25000)	Multiple	OR
Those areas adjacent to the existing High Uintas Wilderness and other wilderness areas should definitely be proposed for wilderness designation. (Individual, Dutch John, UT - #A25600.45622)	Ashley, Wasatch-Cache	UT
For instance, on the Carson National Forest significant roadless lands border the Pecos, Wheeler Peak and Cruces Basin Wilderness areas. Protecting these lands and recommending them as additional wilderness makes common sense. On the Santa Fe National Forest, inventoried roadless areas border the Pecos and Dome Wilderness areas and significant portions of the Jemez Mountains contain roadless areas. Protecting these roadless lands would bolster the integrity of the sensitive mountain ecosystems of New Mexico and would do much to provide wildlife movement corridors to ensure the long-term survival of the state's unique fauna. (Individual, Santa Fe, NM - #A22971.45622)	Carson, Santa Fe	NM
We urge you to provide Wilderness protection for much of Alaska's Chugach National Forest. Currently, there is none. Wilderness is good business. Wilderness is sustainable. Please insist that the plan revision include Wilderness protection for the existing Wilderness Study Area, the Big Islands of Prince William Sound (Knight, Montague, and Hinchinbrook), the Copper River Delta and the Kenai Peninsula. (Conservation/Preservation Organization, Seward. AK - #A24021.25000)	Chugach	AK
The planning group of Cordova residents supports a 501(b) Recommended Wilderness-type designation for the eastern Copper River delta because of the	Chugach	AK

long term protection it offers, and because it limits the type of development that degrades fish and wildlife habitat. (Conservation/Preservation Organization, Cordova, AK - #A23229.91110)		
These areas on the Clearwater National Forest and deserve fullest protection as a federally designated Wilderness area. They include: Weitas Creek, Mallard-Larkin Pioneer area, 5 Lakes Butte, Chamberlain Mtn./Vanderbuilt Mtn. area, Pot Mtn., Kelly Creek and the Great Burn area, Cayuse Creek area, Fish and Hungry Creek area, North Lochsa Face area, and Freeze-out Mtn. area (on the Panhandle National Forest). (Individual, Manhattan, KS - #A4598.45624)	Clearwater	ID
<p><b>Idaho Panhandle National Forests:</b> (only portions in the Big Wild Ecosystem, mainly the upper St. Joe River drainage are listed—others outside the ecosystem should also be protected)</p> <p><u>Mallard-Larkins</u> (see Clearwater National Forest)</p> <p><u>Meadow Creek/Vanderbilt-Upper St. Joe</u> (see Clearwater National Forest)</p> <p><u>Mosquito Fly—1150.</u> This area is separated from Mallard-Larkins by a dirt road. It is crucial wildlife habitat and an important fishery. Terrain is diverse and elevation changes are rapid. A recent land exchange blocked up the area in public ownership.</p> <p><u>Midget Peak—1151.</u> This area borders the St. Joe River. It has steep canyons. Simmons Creek is a tributary to the fabled St. Joe River.</p> <p><u>Sheep Mountain/State Line (also Lolo National Forest)—1779.</u> This area includes high alpine. terrain near the headwaters of the St. Joe river. Historic fires have made an interesting mosaic and the rugged terrain is very scenic. Several alpine lakes are found near the state line on both sides of the border. Many higher peaks dot the landscape, on and off the Bitterroot Crest.</p> <p><u>Grandmother Mountain—1148.</u> This area is a popular high elevation recreation area. However, ORV use creates damage along the trails and meadows, especially around Widow Mountain. Much of the area is managed by the BLM and a corner of it drains into the St. Maries River. (Conservation/Preservation Organization, Moscow, ID - #A22654.25200)</p>	Clearwater, Idaho Panhandle, Lolo	ID, MT, WA
I ask that you try to have these areas—including Baker-Snoqualmie and Gifford Pinchot—be designated wilderness areas to be regulated by Congress. (Individual, Bellingham, WA - #A21485.45622)	Gifford Pinchot, Mt. Baker-Snoqualmie	WA
<p><b>ADDITIONS TO SELWAY-BITTERROOT WILDERNESS AREA</b></p> <p><u>Meadow Creek/Vanderbilt and Rawhide—1302 and 1313.</u> (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, 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 appendices (page C-224). This has been done and the two areas should be considered as one roadless area. Recent land exchanges have removed the private checkerboard land formerly found in the southern part of this area. The map that shows development in this area is not as extensive as what has occurred. For example, there is a corridor along the North Fork River. These are all logical additions to the Selway Bitterroot Wilderness and many were previously included in the old Selway Primitive Area. (Conservation/Preservation Organization, Moscow, ID - #A22654.25200)</p>	Idaho Panhandle and Lolo	ID, MT, WA
<p><u>Upper Bear Creek.</u> This area, about 700 acres, has been in wilderness proposals though it was inadvertently neglected in the Nez Perce forest plan inventory. However, it appears to have been included in Bitterroot National Forest inventories as it is contiguous with the Selway Bitterroot additions on that forest (although it is in Idaho, on the Nez Perce National Forest). It is 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. (Conservation/Preservation Organization, Moscow, ID - #A22654.25200)</p>	Nez Perce	ID

<p>Hells Canyon is the deepest gorge in North America. These areas should be added to the Hells Canyon Wilderness:  <u>Klopton Creek/Corral Creek and Big Canyon A—1854 and 1853 (Hells Canyon NRA)</u>. These areas were recommended for further planning in the RARE II final EIS but were not included in the inventory in the Nez Perce forest plan due to the fact they are within the Hells Canyon National Recreation Area (HCNRA) managed by the Wallowa-Whitman National Forest.  <u>Salmon Face—1855</u>. This area contains spectacular scenery adjacent to the Hells Canyon Wilderness. It also contains a significant, natural cave which has created recent management controversy. The agency must do a better job protecting this area.  <u>Rapid River—1922</u>. (also Payette National Forest). The Rapid River is a wild and scenic river and contains crucial anadromous fish habitat for Chinook salmon. The area is unique in that it escaped fires early in this century. it is a very popular backcountry area and should be added to the Hells Canyon Wilderness. (Conservation/Preservation Organization, Moscow, ID - #A22654.25200)</p>	<p>Nez Perce, Payette</p>	<p>ID</p>
<p><b><u>Secesh, Needles, and Caton Lake Roadless Areas</u></b>                  These three areas should be considered the South Fork Salmon Wilderness in three units. . . . They include the Secesh (South Fork north) west of Zena Creek and along the South Fork of the Salmon; the Needles (South Fork west) along six mile ridge and beside the South Fork of the Salmon to the north and South of Blackmare Creek; and Caton Lake (South Fork east) along the South Fork of the Salmon and the East Fork of the South Fork Salmon River.                  The South Fork north area is, fortunately, little threatened. This area includes the lakes portion of Twentymile Lakes, Loon, Enos, and Jungle Lakes, part of the Secesh River and the South Fork. The only area that is threatened is Loon Lake which is popular with trail bicycles. Quartz Creek on the southeast of the area is another spectacular drainage.                  South Fork west is another subject. Sixmile Ridge, above Krassel, has been controversial for may years because of its timber potential. Include it in the proposed wilderness and go get your timber in another place. It is sensitive because of its place adjacent to the South Fork and Fitsum and Buckhorn Creeks. In addition, the Ponderosa pine habitat is increasingly uncommon and most of this I would say is not in serious jeopardy from fire. The rest of the South Fork west region from Cly Lakes and the Lake Fork watershed and Idler drainage to Nick, Buckhorn and Backmare lakes and the creeks that drain them are shoe-ins for wilderness designation. The Buckhorn drainage is a special case and one that has recently gone from worse to better. A few years ago the main stem Buckhorn Creek “blew out” sediment in a rain on snowstorm, carrying much of the road with it. Then the Forest Service chose to close about 6 miles of the road along with pulling out culverts; the “road” is now a trail. Please include this trail in the recommended wilderness. It is roadless at least.                  South Fork east (including the Boise NF portion of the Caton Lake Roadless Area) is the lesser known of the South Fork roadless areas and deserves to be wholly designated as wilderness. . . . The Thunderbolt Mountain timber sale illegally cut into this area on the south. (Individual, Boise, ID - #A21369.25200)</p>	<p>Payette</p>	<p>ID</p>
<p>I strongly support protecting the following potential new wilderness areas and potential additions to existing wilderness areas, as well as potential new wild and scenic rivers. These six potential wilderness areas are within the South Fork Trinity River Watershed.  <b>The six potential wilderness areas are:</b>                  Chinquapin Potential Wilderness                  Underwood potential wilderness                  Pattison potential wilderness</p>	<p>Shasta-Trinity, Six Rivers</p>	<p>CA, OR</p>

South Fork potential wilderness Yolla Bolly Middle Eel potential wilderness addition Chanchellula potential wilderness addition Eligible and potential new Wild And Scenic River sections: Upper South Fork Trinity River above Forest Glen Lower Hayfork Creek, major tributary to the South Fork Trinity River. (Individual, Orleans, CA - #A27263.25200)		
Please consider wilderness recommendations for Shoshone National Forest's roadless areas. (Individual, Dallas, TX - #A143.45620)	Shoshone	WY
The Cascade Siskiyou area has the additional resources to be a Monument due to its unique beauty. (Individual, Ashland, OR - #A14573.45620)	Siskiyou	OR
I urge you to include the King Range Nat'l Conservation area and the LOST COAST as California wilderness areas. (Individual, Santa Rosa, CA - #A21284.25200)	Six Rivers	CA
The FS should place the Mansfield peninsula under the management of AINM [Admiralty Island National Monument] and suggest to Congress it be placed in Kootznoowoo Wilderness. (Individual, Juneau, AK - #A2319.45500)	Tongass	AK
By the time the Alaska Lands bill (ANILCA) had passed in 1980, many of the most important watersheds with the largest old growth spruce and Western Hemlock had been logged. Logging and roads were extensive on Prince of Wales Island; Baranoff, Kuiu, Chicagoff and those roads were causing problems for fish spawning streams and they still are. . . . The best use of what is left of the Tongass National forest is wilderness. (Individual, Juneau, AK - #A10588.45623)	Tongass	AK
On the east slopes of the Cascades, a few Roadless Areas in particular such as Nason Ridge of Tiffany Mountain are so spectacular they should have been included in the original Wilderness Act but were taken out by pressure from timber interests. (Individual, Peshastin, WA - #A20875.45624)	Wenatchee	WA
The Roadless Rule should stand as it was written, with NO exemption for Pelican Butte, which should be added to the Sky Lakes Wilderness Area, of which it was originally intended to be a part. (Individual, Klamath Falls, OR - #A1035.45622)	Winema	OR

**Table F-4. Site-Specific Requests that Areas not be Recommended/Designated as Wilderness**

Area	National Forest or Grassland	State
My state of Montana has an average yearly salary of approx \$22,000 per person. We have lost logging, mining, and ranching as industries and are told we need to depend on tourists who want to "view wilderness and more wilderness." They can view what we've got. That's enough! (Individual, Kalispell, MT - #A1076.75200)	Multiple	MT
We note that in the Central Idaho Wilderness Act of 1980 (Public Law 93-312), Congress specifically stated its intent that the wilderness legislation was a comprehensive land allocation decision relative to the roadless areas. The roadless areas were allocated by Congress. Similar land allocations were made in the Oregon Wilderness Act of 1984 wherein Congress specifically reviewed the roadless areas and in turn designated the roadless lands that need to be protected for their watershed, wildlife habitat, scenic and historic, and primitive recreation values as wilderness (see "Oregon Wilderness Act of 1983, Hearings Before the Subcommittee on Public Lands, Reserved Water"). These are the same values that are now being re-evaluated. To	Multiple	OR

<p>avoid conflicts with these earlier congressional reviews and comprehensive lands allocations, we suggest that these Congressional designations be followed. (Joyce Morgan, Commissioner, Douglas County Board of Commissioners, Roseburg, OR - #A11811.25110)</p>		
<p>The advance notice of proposed rulemaking dated July 3, 2001 states “The Forest Service has been evaluating roadless areas for nearly 30 years”. While this may be true Service-wide, this effort was concluded in Wyoming with the passage of the Wyoming Wilderness Act of 1984 (Public Law 98-550). This public law states in Title II, the Congress has made its own review and examination of the National Forest Roadless Areas in Wyoming and the environmental impacts associated with alternative allocation of such areas. Section 401(b):”On the basis of such review, the Congress hereby determines and directs that -                  (2) the Forest and Rangeland Renewable Resources Act of 1976 (Public Law 94-588) to be an adequate consideration of the suitability of such lands for inclusion in the National Wilderness Preservation System and the Department of Agriculture shall not be required to review the wilderness option prior to the revisions of the plan, but shall review the wilderness option when the plans are revised.”                  Section B (3): “Areas in the State of Wyoming reviewed. . . shall be managed for multiple use in accordance with the land management plan.”                  Section B (5): “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 Wyoming for the purpose of determining their suitability for inclusion in the National Wilderness Preservation System.” (Timber or Wood Products Industry/Association, Cody, WY - #A19163.25100)</p>	<p>Multiple</p>	<p>WY</p>
<p>I am against any more Wilderness Designation in the Jackson area, we actually need more Multiple Use. (Individual, No Address - #A9003.50200)</p>	<p>Bridger-Teton</p>	<p>WY</p>
<p>The Chugach is also subject to the No-More clause of ANILCA and, as with the Tongass, must have areas set aside for intensive forestry. This is the only way to insure that resource development interest can become established and remain viable on the Chugach. (Timber or Wood Products Industry/Association, Ketchikan, AK - #A20443.25100)</p>	<p>Chugach</p>	<p>AK</p>
<p>Given Section 708(b) (4) and Section 1326(b) of ANILCA, none of the roadless areas in the national forests in Alaska should be proposed to Congress for wilderness designation. (Individual, Sitka, AK - #A12821.25240)</p>	<p>Chugach, Tongass</p>	<p>AK</p>
<p>In the Olympic area, the National Forest surrounds nearly 1,000,000 acres of the primarily roadless, Olympic National Park. In the Park, the designation of roadless areas for wilderness use has clearly been met. Further dialogue occurred in the 1984 wilderness Hearings in Washington State that designated another one million acres for these purposes, including over 100,000 additional acres in the Olympic area. Elsewhere this may not be true and the merits of designating roadless areas would need to be debated locally, on a case-by-case basis in those areas. (Larry Doyle, Mayor, City of Port Angeles, Port Angeles, WA - #A22068.45100)</p>	<p>Olympic</p>	<p>WA</p>
<p>Congress has already designated vast areas of the Tongass as wilderness or LUD II lands where development is restricted. No more areas of the Tongass should be proposed as wilderness. Balanced multiple use should be provided through the local forest planning process, and the needs of the communities dependent on the Tongass must be genuinely considered and provided for in that process. Under the provisions of ANILCA, none of the roadless areas on the Tongass should be recommended to Congress for wilderness designation. (Ketchikan Gateway</p>	<p>Tongass</p>	<p>AK</p>

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Borough, Ketchikan, AK - #A17476.25240)		
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## **Appendix G**

### **List of Preparers**

The list includes the names of the individuals and area of contribution they made toward the completion of the analysis of public comment for the Advance Notice of Proposed Rulemaking.

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