

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,¹ 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.² Management of inventoried roadless areas was previously addressed in the Roadless Area Conservation Rule (Rule), signed

¹ 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.

² 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.