

APPENDIX V - SELECTED LETTERS

Selected letters received in response to the RARE II Draft Environmental Statement are reprinted in this appendix. Letters printed do not include all received in any one category of response. Some letters were received after the October 1 cutoff date and others have not been retrieved from the Salt Lake City Content Analysis Center. Those reprinted here represent response of Federal agencies, State governments, and selected National organizations. This appendix is designed to give reviewers an opportunity to see how others responded to the draft statement.



Department of Energy
Washington, D.C. 20585

SEP 15 1978

Honorable M. Rupert Cutler
Assistant Secretary for
Conservation, Research and Education
U.S. Department of Agriculture
Washington, D.C. 20250

Dear Dr. Cutler:

Enclosed is the "Energy Resource Assessments of Ten Alternatives to Wilderness Designation in U.S. Forest Service's 1977-1978 Roadless Area Review and Evaluation (RARE-II)," for use by the U.S. Forest Service in its wilderness designation process. In the report, the Department of Energy (DOE) has refined its statement of interest in the energy resource potential of the RARE-II tracts in an effort to minimize the conflict between energy resource development and wilderness. To accomplish this, we have estimated the extent of energy resources, established priorities for tracts of interest and suggested boundary changes.

The analysis summarized in this report includes oil and gas, coal, uranium and hydroelectric energy resources as well as an assessment of the potential impact of wilderness designation on energy transportation corridors. An analysis of the geothermal energy potential on the RARE-II tracts is still underway and this energy resource is therefore not covered in the report. Analysis completed since the August 24 meeting between DOE and DOA staff shows that there may be significant conflicts between wilderness designation and future geothermal energy development in a number of tracts. DOE is continuing to assess new information which could affect the resource assessment and ranking of the tracts. For example, there is a substantial amount of new DOE data on uranium resources which is still under review. If subsequent discoveries or analyses result in any changes in the rankings now provided, we will of course inform you as soon as practicable.

The most serious conflict is with oil and gas resources in the Rocky Mountain Overthrust Belt. As you know, a large majority of the acreage of interest is under lease. The current problem - deciding which tracts must be set aside for oil and gas development - has heretofore been exacerbated by an administrative

decision of the Forest Service to not allow the site investigation necessary to make an informed decision. DOE is therefore extremely concerned both that the acreage of high potential for oil and gas not be irrevocably committed to wilderness and that a statutory program be established to guarantee the development of the necessary information for an informed decision on designation of these tracts.

DOE is encouraged by your initial response to our presentation of a proposal to resolve this conflict. In the coming weeks, we wish to pursue this cooperative solution with you.

Sincerely,

John F. O'Leary
Deputy Secretary

Enclosure

V-2



ER-78/566

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

NOV 2 1978

Mr. John R. McGuire
Chief, Forest Service
Department of Agriculture
Post Office Box 2417
Washington, D.C. 20013

Dear Mr. McGuire:

This is in response to your June letter requesting the Department of the Interior to review and comment on the draft environmental statement for your proposed Roadless Area Review and Evaluation - RARE II. Accordingly, we have reviewed the statement and supplements and offer the following general comments. We are also enclosing bureau comments on specific roadless areas identified in the supplements.

The draft statement displays 10 alternatives for allocating roadless areas to wilderness proposals, nonwilderness uses, or further study. Evaluation criteria were established to develop these alternatives and tentative decision criteria are proposed to enable the Forest Service to formulate its proposed action. These criteria consider the various advantages and disadvantages of wilderness and nonwilderness uses of the National Forest system and recognize that some lands are best used for wilderness and others for multiple-use. The statement also makes clear that a major purpose of RARE II is to determine roadless areas that should be made immediately available for nonwilderness uses.

We agree with and strongly support these efforts, because the key to orderly management of the National Forest system is to make timely decisions.

In discussing land acquisition, it would be helpful to show how many acres are in private ownership and the approximate purchase cost under each alternative. The amount of outstanding mineral rights, an estimate of the potential for the rights being exercised, potential protection from State laws, and the estimated cost of acquiring the rights should be included in the RARE II evaluation. For example, the

-2-

eastern wilderness Beaver Creek Area in Kentucky has over 5,000 acres of outstanding mineral rights whose cost is an estimated \$5 million. Further, the effect of wilderness areas on adjacent private or other public lands is important but not clear. The planning process should be such that management of the lands can be carried out cooperatively.

Each alternative classifies roadless areas for future use. It is not clear if the classifications will be permanent. It is possible to envision situations where area reclassification may be warranted. We suggest that the relationships between RARE II and other land classification systems, as well as the possibilities for reviewing and changing land classification, be discussed more fully.

Our review indicates that if wilderness designations are pursued, adverse impacts to Indian lands and people may occur. The degree of these impacts needs to be addressed for all of the lands allocated to wilderness involving Indian claims or dependence. For example, some designations may limit treaty and other rights on portions of the National Forest system reserved to Indians for gathering wood, hunting, fishing, water usage, and the gathering of food and medicinal herbs. In addition, changes in air quality classifications for wilderness areas to Class I may limit planned or potential industrial developments.

We urge that the Forest Service consider cultural resources early in the planning process in order that decisions about management activities may be responsive to the inherent values of cultural resources and to the uses to which these resources can be put, and in order that conflicts can be anticipated and avoided.

The presence of lands associated with or designated as National Historic or Natural Landmarks or as components of the National Trails or Wild and Scenic Rivers systems should also be considered when proposing wilderness designation. These lands frequently are located within roadless areas. While enabling legislation protects components of these programs, wilderness designation of adjacent roadless areas would not only be compatible with these protection provisions, but would also serve to reinforce them.



ASSISTANT SECRETARY

OFFICE OF THE SECRETARY OF TRANSPORTATION
WASHINGTON, D.C. 20590

OCT 31 1977

Mr. John R. McGuire
Chief, Forest Service
U.S. Department of Agriculture
P. O. Box 2417
Washington, D.C. 20013

Dear Mr. McGuire:

The Department of Transportation has reviewed the draft environmental impact statement (EIS) for the Department of Agriculture's Roadless Area Review and Evaluation program.

This Department has previously pointed out the need to assure that wilderness proposals do not preclude location, operation and maintenance of electronic equipment or other navigational aids which are necessary for the safe operation of aircraft and boats. In many instances, these facilities have very precise location requirements, which must be met in order to provide necessary electronic or visual coverage. If we are unable to meet these location requirements because of land use restrictions, adverse effects on public safety may result. With few exceptions, these facilities are generally small, unobtrusive, and would not interfere with wilderness experience. We reiterate our recommendation of September 20, 1977 (copy enclosed), that consideration of the need for such facilities be included among criteria for evaluating roadless areas.

We believe that existing or proposed DOT navigational facilities should be excluded from the proposed wilderness areas, or the legislation should permit their installation and maintenance, notwithstanding wilderness designation. We recommend that USDA coordinate with the U.S. Coast Guard and the Federal Aviation Administration concerning existing or proposed facilities which may be located within the specific roadless areas under study. The staff contact for the Coast Guard is LtCdr. Robert Bower, Real Property Branch, (202) 426-2001; the FAA contact is Mr. George Viau, Environmental Systems Division, Airway Facilities Service, (202) 426-8937.

However, we should note that our concerns are not limited to providing or maintaining sites for existing navigation aids or for those which are currently proposed. Since changes in travel patterns or in technology may dictate new site requirements for future navigation aids, we believe the legislative proposals for any wilderness areas recommended as a result of the RARE program must include broad language specifically authorizing retention or establishment of the navigation facilities. We recommend that OMB and the Department of Agriculture include the following language:

"Nothing in this Act shall be construed to impair or otherwise diminish the authority of the Federal Aviation Administration or the U.S. Coast Guard, pursuant to appropriate statutes, to use the wilderness areas designated by this Act to construct, operate or maintain aids to navigation facilities for transportation and public safety."

The potential impact on a region and surrounding activities as a result of a wilderness designation, particularly the possibility of precluding transportation improvements on existing or proposed corridors through, as well as to, wilderness areas, should be addressed from State and National perspectives. Prior to designating specific new wilderness areas, we suggest that the appropriate State highway agency be contacted to assure that no new roadway facilities are underway in that particular area. A road "corridor" should be defined as an indefinite strip of land encompassing a roadway generally within a one-mile band. This would permit the appropriate relocation or reconstruction of facilities where needed with due regard for safety, capacity, and environmental impacts.

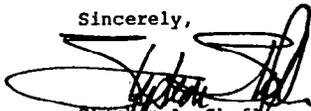
Finally, we wish to make the following recommendations for specific areas:

1. Certain portions of Inventory Area 134 should be classified as nonwilderness in order to allow improvement to U.S. Route 40 on the last side of Berthoud Pass. Specifically, the portions are in T.35, R.75W as follows: S 1/2, Section 16; S 1/2, Section 17; E 1/2, Section 19; and all of Section 20.
2. Areas 281, 285, 331, and 332 should be classified as nonwilderness for the possible improvement of U.S. Route 160 over Wolf Creek Pass. An alternative to nonwilderness classification for these entire areas would be the establishment of a nonwilderness corridor in cooperation with the Colorado Department of Highways for a possible future highway improvement.

We regret the delay in providing DOT's comments on the draft EIS. However, at the departmental level, we did not become aware of the RARE II draft EIS until comments were invited by the Office of Management and Budget, in late September, although we have been informed by your staff that copies were sent to the regional office of some elements of the Department.

In conclusion, the RARE II study and potential wilderness designation for roadless areas may have significant impacts upon transportation facilities. Because of our strong interest in the project, we would like to meet with the Forest Service and representatives of OMB to discuss how DOT can be more fully involved in the final stages of the study. Please contact Mr. Martin Convisser, Director, Office of Environment and Safety, or Mr. Joseph Canny, Chief, Environmental Analysis Division, at (202)426-4357 to set up such a meeting. We look forward to cooperating with the Forest Service on the RARE II study.

Sincerely,



Stephen A. Sheffer
Deputy Assistant Secretary for
Policy and International Affairs

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

29 SEP 1978

OFFICE OF THE
ADMINISTRATOR

Mr. John McGuire
Chief, Forest Service
Department of Agriculture
P.O. Box 2417
Washington, D.C. 20013

Dear Mr. McGuire:

Pursuant to our responsibilities under Section 309 of the Clean Air Act (CAA) EPA has reviewed the Forest Service draft environmental impact statement (DEIS) "Roadless Area Review and Evaluation RARE II."

We have noted significant improvement in the quality of the procedure being used in this roadless area review as compared to the RARE I effort. We believe that with some modifications the basic elements of a good evaluative and decision making process are contained in the RARE II effort. The remaining question now is how will these elements be integrated for the recommended action. EPA's review therefore has focused on the general assumptions and methodologies employed in generating those alternatives and the environmental impacts of the presented alternatives.

Our major concerns with the RARE II process include:

- need for an additional decision criterion of environmental sensitivity to be used in alternative development
- appropriateness of selected decision criteria and use of unbalanced decision criteria in the development of alternatives
- inadequate consideration of the environmental impacts of the presented alternatives

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OFFICE OF THE CHIEF

- lack of opportunity for public review of Forest Service recommendations

EPA's review has given special attention to the decision criteria (pages 67-68), as requested in the cover letter transmitting the DEIS, and has concluded there should be an additional criterion of "environmental sensitivity." The rationale for this criterion is based on the premise that certain areas, because of high quality water, drinking water supply, steep slopes, unstable soils, etc., should be recommended for wilderness designation to prevent costly pollution problems by protecting the natural resources involved.

It is EPA's belief that wilderness designation is an appropriate and effective mechanism for protection of the natural environment and that the RARE II process is a particularly significant opportunity to maintain undegraded environments that are currently of high quality. In this respect our concerns are compatible with the Forest Service mandates to protect watersheds and maintain water flow. It is particularly important to protect water quality and quantity since National Forests are the source of more than 50 percent of the water produced in 11 western States (p. 15, DEIS).

With regard to the decision criteria chosen by the Forest Service, EPA believes that some of the criteria need clarification, re-evaluation, or revision before they are suitable for use. Of particular concern is the commodity output criteria which ignores development costs and uses unexplained commodity screen values. Any discussion of commodity outputs should include consideration of the demand for that output, the economic feasibility of obtaining the commodity, the development costs involved with the production of the commodity, physical or environmental restraints which constrain output, and the administrative ability to meet that output. Because of the irreversible nature of the decision to develop a roadless area it is EPA's belief that the economic criterion used needs to adequately demonstrate the economic necessity for and feasibility of removing roadless areas from wilderness consideration. The economic analysis presented in the DEIS does not adequately demonstrate this necessity. Due to the difficulty in predicting long term demands for resources EPA would anticipate a substantial percentage of lands being allocated to the future planning category to ensure sufficient elasticity in responding to increasing wilderness demands over the long term.

Our review has indicated that for the alternatives presented the assumptions and methodology do not adequately reflect all the environmental benefits or charge the developmental costs to the proper account. The discussion of air and water quality impacts is inadequate in that it does not recognize the direct benefits that wilderness designation can make to protection of water and air quality. The potential adverse impacts of non-wilderness designation on air and water quality were also not adequately evaluated.

EPA believes that this decision to allocate over 62 million acres to wilderness, non-wilderness, or further planning is very significant from the standpoint of our responsibility for protection of water quality under the Clean Water Act (P.L. 95-217). Although the DEIS states that minimum state water quality standards will be met, EPA is concerned with the degradation of existing high quality waters to minimum standards. The DEIS fails to adequately address this concern.

The DEIS also contained no discussion of the alternatives in relation to noise impacts or pesticide and herbicide usage. These deficiencies must be corrected in the final EIS.

EPA has several concerns over the RARE II effort as it is being integrated into the National Environmental Policy Act (NEPA) process. We question whether public notice of supplemental information which has been developed to improve inadequacies in the DEIS is sufficient to meet the intent of NEPA for public disclosure. Secondly, we question whether the Forest Service is meeting NEPA's intent for the public to have an environmental analysis of the proposed Federal agency action. We are concerned whether the DEIS provides such an analysis in view of the Forest Service's statement that we "never thought we would pick one of the alternatives" in the RARE II DEIS (Forest Service official at public briefing on RARE II, September 26, 1978). Thus we find the current DEIS is simply an outline of the decision framework to be used. Extensive public review and discussion of this decision framework will no doubt improve the process, but the NEPA process requires an analysis of the decision the Federal agency is considering.

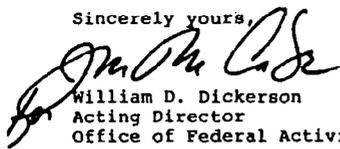
The importance and controversy of the issues suggest that what is necessary to fully inform the public and meet the intent of NEPA process is a document that discusses how the Forest Service has used the decision criteria in arriving at wilderness recommendations. That document then needs a thorough public review before the final recommendations are made and discussed in the final EIS.

In conclusion, EPA's review has found this draft document to be inadequate (Category 3) both in its lack of consideration of EPA mandated environmental concerns, in its general use of unsupported and undocumented statements, in its lack of related data on demands for resources and in its unbalanced economic approach. A more expanded discussion of these issues is included in our enclosed detailed comments.

The classification and date of EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal actions under Section 309 of the Clean Air Act.

We appreciate the fine staff response we have experienced so far and anticipate continued good working relationships as we seek to resolve these issues.

Sincerely yours,


William D. Dickerson
Acting Director
Office of Federal Activities (A-104)

Enclosure

EPA's Detailed Comments on
the Forest Service Draft Environmental Impact Statement
(DEIS) "Roadless Area Review and Evaluation,
RARE II"

I. Water Quality

The long-term protection afforded to water quality by wilderness is an important consideration and should be emphasized in the final EIS. Roadless areas that supply a substantial portion of a given watershed can and should be identified, as well as those that supply high quality waters to downstream municipal supplies, outstanding fisheries, National Wild and Scenic Rivers and the like.

Further, the RARE II process does not appear to have considered water quality as an evaluative criterion for wilderness designation, nor does there appear to have been coordination with the planning process under Section 208. Wilderness designation is especially supportive of the objectives of Section 208 of the Clean Water Act, which establishes a mechanism for EPA-funded State and local planning and programs to reduce or eliminate non-point sources of water pollution including that from silvicultural activities.

The most significant form of adverse water quality impact associated with forest management activities is stream sedimentation (U.S.D.A. Forest Service, 1977). Studies in forests of the Pacific Northwest have shown increases in the rate of sediment production due to land disturbing activities ranging from slight to over 45 times the rate for undisturbed areas (Megahan, 1974). Of various types of land disturbance, road construction has generally been linked most closely with increases in sediment production (U.S. EPA Region 10, 1975). For example, a study of Oregon's Bull Run Watershed indicated that 70 per cent of stream sedimentation resulted from road construction (Frewing Committee, 1973).

EPA recognizes the Forest Service's growing commitment to protection of water quality in all its land management activities. Reductions in potential adverse water quality impacts from such activities have been considerable in recent

years. However, adequate protection becomes increasingly costly and difficult as road building and timber harvest expand into marginal areas with steep and unstable soils. Many roadless areas have these characteristics.

In addition, violations of water quality standards have occasionally occurred as a result of Forest Services activities, despite stated commitments to protect water quality. A report analyzing road construction in Idaho indicated that, "a gap remains between the possible and achieved results in many road projects," (Hartvog & Gonsior, 1973). In some instances where all apparent practical measures were taken to achieve a quality result, problems still occurred. Most notable has been the severe degradation of water quality in the South Fork of the Salmon River in Idaho during the 1960's, in which accelerated erosion associated with road construction and logging caused major loss of salmon habitat and led to a moratorium on those management activities.

The final EIS should also include additional information on the ultimate water quality impacts of the various alternatives. Deficiencies are particularly apparent in the State supplements. For example, the Alaska Supplement makes no mention of water quality impacts, even for alternatives in which a large majority of areas are designated non-wilderness. The Idaho Supplement states, on page 70, that under these same alternatives water quality would be improved due to better prevention of large wild fires. This conclusion ignores the potential for logging or road building impacts on water quality. On page 73 of the Idaho Supplement, alternatives C and H are said to provide "a moderate reduction in soil disturbance," leading to a "moderate improvement in water quality." These alternatives, however, would allocate 92% and 85%, respectively, of the presently undisturbed areas to non-wilderness, clearly causing a potential decrease in water quality from present conditions.

2. Air Quality

The DEIS (page 36) stresses the potential restrictive impact of wilderness designation on activities which lower air quality, but virtually ignores the significant impacts on air quality which may result from activities permitted under non-wilderness designation. Increasing the area

available for timber harvest has the potential to increase the degree of air quality impacts resulting from silvicultural burning compared to present conditions. Conformance of silvicultural burning with existing State Smoke Management Plans, provides only partial assurance that air quality problems will be avoided.

Although the DEIS cites the negative impact of classifying areas as wilderness in terms of the restrictions on future activities which might degrade air quality near wilderness areas, no examples are given. The potential activity restrictions should be documented with examples of these activities, a description of which proposed wilderness areas are involved and a discussion of the resource tradeoffs proposed. This type of information could then be viewed in the context that clean air is a desirable commodity, and one that is especially valuable in the Western States where visibility can extend for hundreds of miles.

The DEIS incorrectly interprets the Prevention of Significant Deterioration (PSD) class designations and wilderness. Areas which are designated wilderness as a result of recommendations pursuant to RARE II could be designated either Class I, II, or III depending on the specific area involved and the intentions of the State government.

3. Pesticides and Herbicides

There is no information presented in the DEIS concerning the implications of the various alternatives for use of silvicultural chemicals (including pesticides and herbicides). RARE II alternatives with greater non-wilderness designation would presumably involve increased potential for use of silvicultural chemicals. This should be discussed in the FEIS. Of particular concern to EPA is the possible long term health effects from use of phenoxy herbicides. These concerns are reflected in the current RPAR process (Rebuttable Presumption Against Registration) under which the herbicide 2,4,5-T is undergoing a thorough risk-benefit analysis to determine possible needs for changes in registration.

be presented for visitor days at existing wilderness areas and projections made from these trends to estimate future demand. [Krutilla and Fisher (1975) have documented that the demand for primitive recreation has been increasing at a rate of 10% per year]. We believe that such information would show that the demand for wilderness areas will become significantly greater in the coming decades. This is especially important in view of the dwindling potential supply of wilderness areas nationwide.

The DEIS discussion of recreation (pp 37-39) which states there may be a need for "use restrictions to protect the wilderness resource" implies that the demand for wilderness is not being met.

Since the roadless areas are the only resource the Forest Service has to meet the wilderness demand we believe that wilderness usage should be the highest and best use for these areas. Moreover, since other lands are available for development, we believe that the development of roadless areas should proceed only after a clear showing of necessity and feasibility. This is particularly critical since wilderness is, for all practical purposes, a non-renewable resource. A decision to make an area a wilderness is always revocable but a decision to develop an area suitable for wilderness is irreversible. The irreversibility of a decision to develop wilderness, then, requires that not only the demand of people today for that resource be considered but also the demand of future generations for the resource.

7. Decision Criteria

a. The relationship of the 1975 Resources Planning Act (RPA) targets for wilderness and the outputs from RARE II need to be clarified. On page 67 of the DEIS it is stated that the 1975 RPA targets will be a major consideration in evaluating alternatives. This seems inconsistent with the statement on page 3 that RARE II will provide data to assist the 1980 RPA update.

b. Although public concerns should be incorporated into the RARE II process, the Forest Service should clearly keep in mind the national interest in wilderness.

c. If the costs or impacts of designating roadless areas as wilderness are to be measured in terms of commodity outputs foregone, these outputs should be net outputs foregone not the gross outputs. For example, many roadless areas have not been developed because of high development costs. Such costs should be factored into the output foregone calculation.

EPA questions a decision criterion that is based on "enhancement" of economic factors for local communities. While this is a worthwhile goal, it should be recognized that this local support comes at some cost to the Nation as a whole. The question must be asked at what point the gains in local economic stability are out-weighed by the National costs, in public funds expended to provide commodity outputs from public land, and in loss of wilderness qualities valued by the national public. It may be that providing additional National Forest timber from roadless areas is not the most efficient means of supporting the economy of local communities when considered from the standpoint of overall National domestic policy. In fact, contributing to continued dependence of these communities on a single industry may work against the cause of economic stability, when compared to programs which may encourage economic diversity.

Additionally, it is important to distinguish job losses that relate directly to wilderness designation as opposed to those jobs which may be lost as a result of timber practices which must be modified to meet sustained yield requirements.

d. Decision criteria for energy independence, housing starts and inflation should be applied only to the extent that these considerations have not been applied in other decision criteria (timber is double counted by being considered as a commodity output foregone and again under national issues), and to the extent that these criteria provide a cost-effective means of advancing these objectives, compared to other national programs. It should be noted in this regard that the increases costs of timber production on more marginal lands may be inflationary. Also, programs which encourage increased motorized recreational use may not contribute to energy conservation.

e. The formulation of concepts on land form and ecosystem representation have significantly added to the definition of a National Wilderness Preservation System. However use of this criterion should be discussed in terms of the methodology and assumptions used to select examples, as well as the values of different examples of the same ecosystem.

f. EPA recommends using the Wilderness Attribute Rating System (WARS), the new criteria of environmental sensitivity, and landform ecosystem representation, as the basic criteria for developing the initial wilderness base against which other economic and commodity concerns will be considered.

However the EIS needs to address the reliability of the WARS technique by discussing whether the regional scores vary significantly from one another and if so whether this variance is a function of the resource measured or a function of the reviewers. A graphic display of the frequency distribution of the WARS ratings for both the National level and for the regions would be helpful. One question that arises is whether there is any significant difference among scores or whether they cluster together.

8. Adequacy of the EIS

Throughout the document we have noticed statements unsupported by fact or not put clearly into perspective. Given the amount of public and private interest in this process this lack of clarity should be corrected. For instance the discussion of water (p. 45 DEIS) implies that water quality may be reduced by natural occurrences and in these instances water quality improvement and corrective action is limited by a wilderness designation. This statement needs to be put in perspective by discussing this problem in relation to how frequently it is likely to occur, the extent of pollution resulting, and a comparison of this natural pollution against pollution which would occur with non-wilderness designation. Until these analyses are performed the usefulness of the original statement is questionable.

Similarly, language on p. 43 of the DEIS refers to the situation in which much of a National Forest's timber base is in roadless areas and therefore not available for sale, with a resultant impact on timber production. Again this statement needs to be put in perspective by discussing how many roadless areas are involved, the volume of timber involved, and the percentage this volume is of a region's programmed output.

**Advisory
Council On
Historic
Preservation**

1522 K Street NW.
Washington D.C.
20005

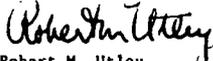
December 13, 1978

Mr. John R. McGuire, Chief
Forest Service
Department of Agriculture
P.O. Box 2417
Washington, D.C. 20013

Dear Mr. McGuire:

The Advisory Council on Historic Preservation has received the Draft Environmental Impact Statement #78-04, Roadless Area Review and Evaluation. In 1977, the Council and the Forest Service executed a Memorandum of Understanding concerning the land use planning system of the Forest Service. That Memorandum provides that the Council need comment only on Forest Service planning documents that authorize land disturbing activities. Accordingly, the Council has no comment on the Draft Environmental Impact Statement. A copy of the Memorandum of Understanding is enclosed for your convenience.

Sincerely yours,


Robert M. Utley
Deputy Executive Director

Enclosure



OHIO RIVER BASIN COMMISSION

Suite 208-20
Cincinnati, Ohio 45202

38 East Fourth Street
513/684-3831 (FTS)

September 19, 1978

Mr. Steve Yurich
Regional Forester
Eastern Region, Forest Service
633 W. Wisconsin Avenue
Milwaukee, Wisconsin 53203

Dear Mr. Yurich:

Thank you for your letter inviting comments of the Ohio River Basin Commission (ORBC) on the Draft Environmental Impact Statement for the Eastern Region Areas in the Roadless Area Review and Evaluation (RARE 11) process.

In my opinion, the EIS has been properly coordinated with the Ohio River Basin Commission members.

The Ohio River Basin Commission staff has reviewed the draft EIS and finds no indication that the proposed action would be incompatible with the ORBC plan as it exists today.

The Commission looks forward to a continuing cooperative effort with your department and appreciates your action in keeping us well informed. Should you have any questions, please contact George G. White, 513-684-3831 (PTS).

Sincerely,



Fred E. Morr
Chairman

5 copies: Office of Federal Activities, USEPA,
1 copy: USDA Member
1 copy: Floyd Wiles

SEP 21 1978

UNITED STATES DEPARTMENT OF AGRICULTURE

SOIL CONSERVATION SERVICE - P.O. Box 2890
Washington, D. C. 20013

SUBJECT: EVT - Draft Environmental Impact Statement (EIS) OCT - 3 1978
Roadless Area Review and Evaluation (RARE II),
Soil Conservation Service Review

TO: John R. McGuire, Chief
Forest Service

The Soil Conservation Service has reviewed the subject draft RARE II EIS. To insure a comprehensive review, we asked our State Conservationists to review the EIS and supplement appropriate to their State and forward comments to the nearest regional forester. We are providing several general comments for your consideration.

The draft EIS is general and presents a series of 10 alternative approaches for allocation of 2,686 RARE II inventoried roadless areas to either wilderness or nonwilderness areas, or recommends further planning for all uses including wilderness.

The SCS recommends that in the alternative or combination of alternatives which is finally selected, consideration be given to access to hydro-meteorological data collection areas. These data stations are important for predicting water supplies in wilderness areas for water-short agricultural lands dependent on such water supply forecasts. Access by primitive means could reduce opportunity to make full use of automated sites and might reduce the effectiveness of the hydrometeorological data collection system.

We commend you in your efforts to develop a realistic and workable management plan for the roadless and undeveloped areas in the National Forest System.

Victor H. Berry Acting For
R. M. DAVIS
Administrator

SOIL CONSERVATION SERVICE
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SEC. ACDS. No. 44-11

STATE OF ALABAMA
1978 SEP 19 11 59 AM
GOVERNOR'S OFFICE
MONTGOMERY 36104
September 12, 1978



The President
The White House
Washington, D. C. 20500

Dear Mr. President:

One of the basic tenets of our democracy is at risk in a decision to be made in Alabama. This decision will come in a connection with the U. S. Forest Service's Roadless Area Review and Evaluation Program (Rare II).

One area being studied for possible inclusion in the wilderness system is a part of Conecuh National Forest. It is in Covington County, Alabama and the code identification is 08212. I am told by citizens in Covington County that the total area being considered is approximately 3,000 acres and that 311 acres of private farmland is included in this study area.

I hold the deep conviction that Government should not take from the private citizen that which belongs to them except as needed to achieve overriding public objectives. I do not believe such overriding objectives are present in the area.

In my judgment we do not need a specific wilderness area in Covington County, Alabama, and I'm in very strong opposition to its development. Maybe sometime in the far distant future conditions will change, but for the time being I would highly recommend that we leave Conecuh National Forest completely unchanged.

Respectfully,
George C. Wallace
George C. Wallace
Governor of Alabama

GCFW/rpb
CC: Senator Sparkman
Senator Allen
Congressman Dickinson

V-14

STATE OF ALASKA

JAY S. HAMMOND, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE COMMISSIONER PO BOX 11 - JUNEAU 99811

John A. Sandor

-2-

October 12, 1978

October 12, 1978

Mr. John A. Sandor
Regional Forester
U. S. Forest Service
P. O. Box 1628
Juneau, Alaska 99802

Dear John:

The State of Alaska has completed its review of the Draft Environmental Statement for the Roadless Area Review and Evaluation of the Chugach National Forest. We find several major deficiencies in the draft and feel strongly that none of the alternatives presented is reasonable in light of present circumstances.

First, and foremost, sufficient data is not available to make an adequate assessment of the impact of each alternative. The Forest Service prepared an exemplary land use planning document for the Tongass National Forest prior to adopting recommendations for wilderness classification. By contrast is our understanding that the planning process for the Chugach Forest is still in its early stages, and even when complete will likely not be as comprehensive in its scope as the Tongass Land Use Management Plan. More disturbing, the planning process for the Chugach Forest is underway without the full and active participation of the State. This must be corrected in order to achieve a mutually acceptable result, sufficient for RARE purposes.

In addition to conceptual deficiencies in the current planning process, there is also a serious lack of information necessary to make these decisions. Supportive studies should be initiated immediately. They should include at the very minimum the following:

- Socioeconomic Impact Study of Alternatives
- Mineral Assessment and Survey
- Fish and Wildlife Impact Study of Alternatives
- Landtype and Timber Review

A second problem is that areas endorsed by the Carter Administration for immediate wilderness designation through "(d)(2)" legislation were excluded from RARE II in the Chugach Forest. A legitimate land use planning process would allow for a comprehensive review of the entire Forest, again as was the case with the Tongass Land Use Management Plan. I do not mean to imply that the Nellie Juan and College Fjords areas are unsuitable for wilderness. Rather I feel that they must be rated and compared with all other areas of the Chugach Forest after sufficient resource information is available to make a sound decision.

A most serious deficiency in the Draft Environmental Impact Statement was the omission of any mention of State selections on any of the maps which accompany the document. Although the text mentions that State Selections were made, the public had no way of determining where the selections are located as they reviewed your maps. Public response may well have been different if the selections were portrayed as they should have been.

One of the basic assumptions of the Draft Environmental Statement is that wilderness designation will preclude future State selections. The State has retained 107,000 acres of entitlement from the National Forests under section 6(a) of the Statehood Act to meet future community development and expansion requirements. In recent legislation -- the Federal Land Policy and Management Act of 1976 -- interference with State land grants was expressly forbidden by Congress (PL 94-579, Section 701(g)(G)). Presumption by the Forest Service that wilderness designation will prevent the exercise of State selection rights violates the clearly implied will of Congress.

Another obstacle to RARE II resulted from simultaneous consideration of two major proposed amendments to the Alaska Native Claims Settlement Act by Congress and the Forest Service. Both amendments have been included in the Senate Committee's version of the Alaska lands bill. If enacted, the amendments will significantly change land ownership in the Chugach Forest, thus invalidating the RARE II Process. This problem should have been foreseen and dealt with.

The first amendment involves the regional entitlement of Chugach Natives, Inc. This amendment would establish a one year study involving the Forest Service, Chugach Natives, Inc., the joint Federal-State Land Use Planning Commission for Alaska, and the State as participants. The objectives of the Study would be to identify lands which can be made

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OCT 18 1978
HOWLAND SAWL

Office of Information

OCT - 2 1978

EDMUND G. BROWN, JR.
GOVERNOR OF
CALIFORNIA



THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

September 29, 1978

Mr. Zane G. Smith
Regional Forester
U. S. Forest Service
670 Sansome Street
San Francisco, CA 94111

Dear Mr. Smith:

The State of California has reviewed the Draft Environmental Statement and Supplement for the Roadless Area Review and Evaluation (RARE II) dated June 1978.

The RARE II process for evaluating roadless areas in terms of their suitability for designation as wilderness or non-wilderness areas fails to provide an adequate means for resolving the issues raised in these judgements. It does not provide an adequate means of public participation, and the computer based approach to determining the future uses of roadless areas fails to provide for the subtleties of environmental issues which may be difficult to quantify but are nonetheless of great importance to the people of California and other states --- the real owners of the six million acres of California roadless areas involved in RARE II.

Because the RARE II process will not contribute to the timely resolution of the issues involved, we will not at this time, with one exception, make recommendations on California roadless areas involved in RARE II. That exception pertains to Trinity County where the Board of Supervisors has endorsed the finding of a county committee which reviewed RARE II areas in the county and made recommendations for their future uses. The State of California strongly supports the recommendations of that committee as outlined in the attached letter of September 7, 1978 from the Trinity County Board of Supervisors. Those recommendations would allocate 185,000 acres to non-wilderness, 179,000 acres to wilderness, and delay designation of 6,200 acres pending further study. The recommendations provide for new wilderness areas and also for an increased cut of 21 million board feet of timber annually.

In lieu of submitting comments on other areas at this time, the State will create a new process for evaluation of the RARE II roadless areas in California. This process will provide, as did the process used in Trinity County, for increased

Mr. Zane G. Smith
Page 2

public participation, mediation of conflicts likely to arise between special interest groups and for adequate consideration of important environmental values.

We will invite the Forest Service to take part in this process and look forward to working in cooperation towards the resolution of issues related to the future use of roadless areas in California.

Our decision not to participate further in the RARE II process should not be viewed as indicating lack of interest for the future of federal lands in California. This decision was made with the conviction that our actions will provide the best means of protecting the public interest in these lands in the shortest time.

Because we have chosen not to comment within the framework of the RARE II process, and because final decisions of designation of California roadless areas will be made by Congress, we will forward our comments on RARE II areas directly to Congress. These comments will be forwarded in a timely manner so our views may be considered by Congress when it focuses its attention on the future of the roadless areas in our state.

I hope to meet with you soon to discuss in more detail our plans and to emphasize our hope that the forest Service will participate in our alternative evaluation process.

Sincerely,

Huey D. Johnson
Secretary for Resources

cc: Trinity County Board of Supervisors
P.O. Drawer AK
Weaverville, CA 96093

Senator Alan Cranston
Senator S. I. Hayakawa
California Congressional Delegation

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OCT 2 1978

STATE OF IDAHO
SECRETARY OF STATE
BOISE

PETE T. CENARRUSA
SECRETARY OF STATE

September 29, 1978

Mr. Bob Torheim
Northern Region (R-1) Forester
Federal Building
Missoula, Montana 59807

Dear Mr. Torheim:

The Forest Service should be commended for its efforts through the RARE II program to determine which lands under its administration will be added to the National Wilderness Preservation System. The State of Idaho supports your goal of reaching a timely and considered decision on these lands. As you have requested comments on the Draft Environmental Statement, we present the following observations for your consideration:

1. The RARE II process needs to be completed as promptly as possible.
2. Putting public lands into the "further planning" category effectively "locks up" such areas, including those of vitally needed energy and mineral resources, from exploration and development. Therefore, the amount of acreage put into this category should be minimized.
3. Domestic energy and mineral resources are of great importance to our nation and our economy. The so-called Overthrust Belt, which runs through the south-eastern portion of our State, is thought to contain sizable amounts of vital mineral resources, such as oil and gas. Areas such as this should not be designated as Wilderness at least until a complete evaluation of such resource potential can be made. With today's technology, exploration can be conducted in an environmentally sound fashion that does not alter the basic Wilderness character of these areas.

Experts tell us that the Overthrust Belt contains at least

Mr. Bob Torheim
September 29, 1978
Page 2

3. (Cont.)
a dozen oil fields of which each field could yield to the State of Idaho, at the rate of 12½% royalties, \$174,000 per oil field. Many of the oil deposits are said to be within the area of the RARE II proposal. Certainly if these oil fields were to be "locked up" it would be of great potential economic set-back for the State of Idaho.
4. It is our understanding that the Bureau of Land Management (BLM) is also studying public lands in Idaho for potential Wilderness designation. It seems unfortunate that its study is not being conducted in conjunction with yours, so that we may look at the public lands issue in the State as a whole. It might be wise for your agency to consult extensively with the BLM on which areas it may designate as Wilderness before submitting your final recommendations.

Preserving wilderness is unquestionably important to the citizens of Idaho and our nation. But, so is careful development of energy, mineral, and timber. We hope that the Forest Service will thoughtfully weigh the above concepts in making its final determinations.

With best wishes for success in completion of this most important task, I am

Sincerely,
Pete T. Cenarrusa
PETE T. CENARRUSA *by mea*
Secretary of State

PTC/mea

V-18



STATE OF ILLINOIS
OFFICE OF THE GOVERNOR

SPRINGFIELD 62706

September 29, 1978

JAMES R. THOMPSON
GOVERNOR

Mr. Steve Yurich
Regional Forester
Eastern Region, Forest Service
633 West Wisconsin Avenue
Milwaukee, Wisconsin 53203

Dear Mr. Yurich:

I have discussed your letter concerning recommendations in regard to the Roadless Area Review and Evaluation (RARE II) process as it relates to the undeveloped Eastern Region areas, with Director Kenney of the Department of Conservation.

We feel that it is important to preserve certain areas as enduring resources of wilderness which shall be managed to promote and perpetuate the wilderness character of the land for the benefit of all. The areas recommended below provide the wilderness character required such as solitude, naturalness, geological and ecological conditions and diversity. In addition, these areas will protect the potential or dedicated natural areas located within them. These areas will provide scenic and historic preservation, scientific and educational use and primitive recreation.

The areas we recommend are as follows:

1. Lusk Creek (Pope County)
2. Bald Knob (Union County)
3. Burke Branch (Massac and Pope Counties)

The ownership of these areas is overwhelmingly in the public. Thus the impact of wilderness designation should have little effect on the tax base of the local governments involved.

It is our recommendation that no further purchases of private land be made unless the owner is willing to sell. We also counsel great caution in restrictions on the use of private land within or adjoining wilderness areas.

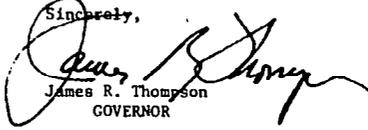
-2-

We further recommend that since all the proposed roadless areas have wilderness potential, they should be utilized and managed to enhance the total resource to include wilderness regardless of their designation in the future.

We consider it vitally important that the best of the small areas remaining in the eastern United States be protected and managed in such fashion as to make them available as wilderness areas for use by future generations.

We appreciate the opportunity to submit these recommendations to you.

Sincerely,


James R. Thompson
GOVERNOR

JRT:cl

V-19

OUT



THOMAS L. JUDGE
GOVERNOR

State of Montana
Office of The Governor
Helena, 59601

SEP 24 1978

RARE II Recommendations
State of Montana

September 28, 1978

Mr. Robert Torheim
Regional Forester
U. S. Forest Service
Federal Building
Missoula, Montana 59801

Dear Mr. Torheim:

Attached are my recommendations for the study areas in Montana which have been included in the Roadless Area Review and Evaluation process. These recommendations are submitted in accordance with the procedures specified by the U. S. Forest Service.

Sincerely,

THOMAS L. JUDGE
Governor

Attachment

In the RARE II process, the state has the responsibility to submit recommendations to the Forest Service, and ultimately the Congress, regarding the designation of study areas within its boundaries. This is a responsibility that my administration approached with the understanding that Montana's recommendation could have a significant effect on the final designation of millions of acres of land in this state.

By considering the comments of the individuals and interest groups with a stake in the RARE II process we have established a foundation that will make it possible for Montana to submit an objective recommendation to the Forest Service on this critical issue ... a recommendation that emphasizes objective analysis rather than political sentiments.

Some states appear ready to take the position that there should be no additional wilderness areas. That approach abdicates the responsibility of the state to make specific recommendations. I believe that the state's recommendations should be as representative as possible of the opinions of the loggers, ranchers, miners, petroleum interests, snowmobilers, wilderness users and other Montanans who will live with the consequences of the RARE II process.

One primary consideration throughout the period of state review was a strong commitment to minimize the category of "further study" -- Montanans want decisions -- not bureaucratic delays.

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THE SELECTION PROCESS

The selection of individual areas for wilderness, further planning, and multiple use recommendation was an extremely difficult task. This committee, chaired by the Lieutenant Governor's Office, was composed of the directors and designated staff representatives of five state agencies: The Department of Fish and Game, the Governor's Office of Commerce and Small Business Development, the Department of State Lands, the Department of Natural Resources and Conservation, and the Department of Livestock.

Members of the Committee are experienced and objective professionals, with broad-based backgrounds, fully capable of making difficult and sensitive decisions while still representing their individual departments. All recommendations were scrutinized by the directors of each agency, and then finally reviewed and passed on by the Governor. These recommendations represent a reasonable approach to the wilderness issue, and a careful balancing of environmental and economic concerns.

The actual selection process involved the use of data obtained from the Forest Service, studies available by the various departments of state government, as well as information provided by special interest groups. All areas were individually discussed and debated numerous times. Consideration was given to the wilderness values, wildlife, recreation and economic characteristics of each region as well as public input by area. The state of Montana's economy has been and will continue to be highly dependent on the basic resource industries - agriculture, mining, forest

products and oil and gas. It is our feeling that areas of the national forest that have significant future economic potential should not be permanently withheld from development. It is also our feeling that any development should be subject to the stringent controls necessary to adequately protect the high quality Montana environment. This country needs energy resources and we could experience a shortage of strategic metals and timber. Every attempt was made to recommend for wilderness designation areas that had high wilderness qualities and minimum economic potential. Clearly this was not always possible since many of the recommended areas do have potential economic conflicts. By the same token, many areas recommended for multiple use designation have high wilderness qualities. Backcountry designation was suggested when it was deemed appropriate to provide an intermediate landuse alternative.

Since the Forest Service did not provide the states with appropriate time to make recommendations on the critical issues involved in the RARE II process, it was difficult to develop a detailed and comprehensive data base. Because of these time and information constraints, the state must reserve the right to amend or adjust its recommendations before specific areas are designated by Congress. With that understanding, I am recommending 600,744 acres for wilderness designation as listed in Table 1.

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TABLE #1

<u>Recommended Wilderness Areas</u>		
Area	Name	Size
B1001	North Big Hole	37,810
C1485	Clearwater-Monture	83,305
D1485	Deep Creek	27,800
F1485	Silver King-Falls Creek	38,300
H1301	Hoodoo	55,000 *
R1485	Renshaw Mountain	27,400
R1549	Madison	43,980
S18AA	Selway BTR Canyon	12,700
O1008	East Pioneer	93,859
O1013	Middle Mtn.-Tobacco Roots	34,640
O1061	Blodgett Canyon	9,600
O1062	North Fork Lost Horse	7,800
O1064	Nelson Lake	2,900
O1065	Swift Creek	700
O1662	Scotchman Peaks	40,000 *
O1428	Flint Range	52,220
O1500-1506	Mission Additions (7)	3,130
O1545	Republic Mountain	700
O1801	Rattlesnake	27,800
O1806	Welcome Creek Addition	1,100
TOTAL ACRES		600,744

* These acreages reflect substantial boundary revision to resolve user conflicts and are approximations.

FURTHER PLANNING

One million four hundred thousand acres of National Forest lands in Montana are undergoing wilderness review by mandate of the U.S. Congress. Designation of RARE II lands to the "further planning" category would indefinitely postpone a decision on such areas. For that reason I recommend no RARE II areas be placed in the "further planning" category.

TABLE #2

Congressionally Mandated Wilderness Study Areas

Great Bear	371,160
Elkhorn	76,346
Spanish Peaks	65,000

West Pioneer	151,000
Taylor Hilgard	289,000
Bluejoint	61,000
Sapphire	94,000
Mt. Henry	21,000
Ten Lakes	34,000
Middle Fork Judith	81,000
Big Snowies	91,000
Hyalite	151,000

TOTAL ACRES1,485,506

RELEASE TO MULTIPLE USE

Of the 3,985,874 acres that were reviewed under the RARE II process I recommend that 3,385,130 acres be released from the RARE II study areas to be managed in accordance with the provisions of the Forest and Rangeland Renewable Resources Planning Act.

The RARE II process, as defined, required a difficult wilderness or non-wilderness choice. Few areas lend themselves readily to that kind of division, either by objective evaluation or public consensus. The either/or option given by the Forest Service was, and continues to be, objectionable to us. Where possible, the difficult decision was made. However, for numerous areas the "showdown" process was simply inappropriate for sensitive areas that could in reality accommodate a broad range of temperate uses, particularly public uses. Rather than force absolute decisions on the potential uses for these areas (and risk foregoing sensible use options or imposing uses incompatible with the land) it is recommended that final decision on approximately 738,728 acres be made only after an additional "backcountry" classification is made available.

The "backcountry" classification will apply to areas where an essentially natural character will be maintained while accommodating a wide range of

temperate land uses. Conceptually, backcountry classification would remain essentially roadless. However, uses such as snowmobiling, live-stock and range management, trail maintenance, firewood collection, management of wildlife habitat or improvement that utilize mechanized equipment would be allowed. Dispersed recreation will be encouraged, along with development of trails, shelters, and primitive facilities. Mineral exploration, including oil and gas would be allowed under approved management criteria. Demonstration of a clear national need for specific commodity would be an acceptable provision for further development. Harvest of the timber resource which would not alter the natural character of an area with permanent road construction could be accommodated.

The backcountry concept must be specifically defined and agreed upon by state and federal management agencies, with public participation, and be available as a land use option when allocating the 738,728 acres under discussion. This classification is available under provisions of the Forest and Rangeland Renewable Resources Planning Act, at the discretion of the regional forester.

During the development or revision of land use management plans, the backcountry option should be developed for public discussion.

Many Montanans have strong feelings pro and con about additional wilderness areas. The majority of residents support neither absolute wilderness nor absolute development. The backcountry option provides for intermediate land use in areas that deserve some form of limited protection.

No simple solutions exist in such complex situations, but Montanans should insure that their input is made known to national decision makers when the health of the vital industries is at stake.

We in Montana know that we have a beautiful state and we accept the responsibility of providing our fair share to the wilderness preservation system. I feel that this proposal accomplishes that goal.

TABLE #3

RECOMMENDED BACKCOUNTRY AREAS

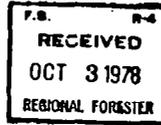
A1485	Bear-Marshall-Scapegoat-Swan (F)	135,220
A1485	Bear-Marshall-Scapegoat-Swan (H)	54,700
A1485	Bear-Marshall-Scapegoat-Swan (LC)	277,750
A1485	Bear-Marshall-Scapegoat-Swan (Lo)	36,895
01063	Trapper Creek	2,500
01066	Needle Creek	1,100
01429	Dolds Lake	9,100
01435	Fred Burr	6,660
01481	Mt. Hefty	13,700
01541	Crazy Mts.	71,040
01911	Line Creek Plateau	20,680
01943	West Big Hole	109,383
TOTAL ACREAGE.....		738,728



MIKE O'CALLAGHAN
GOVERNOR

THE STATE OF NEVADA
EXECUTIVE CHAMBER
CARSON CITY, NEVADA 89710

September 28, 1978



Mr. Vern Hamre
Regional Forester
U.S. Forest Service
324 25th Street
Ogden, Utah 84401

Dear Mr. Hamre:

I am in receipt of the Roadless Area Review and Evaluation (RARE II) Draft Environmental Impact Statement for Nevada. The following are comments and recommendations concerning roadless area management in the State of Nevada.

On careful review, I cannot at this time support any of the alternatives proposed in the draft EIS. The State of Nevada is in the process of reviewing wilderness area proposals by other federal agencies. Notably, these include the Bureau of Land Management, the U.S. Park Service and the U.S. Fish and Wildlife Service. Because of the serious long-term implications of wilderness designation, I do not feel it is proper to act on wilderness proposals on an agency by agency basis. The impact which wilderness designation will have upon surrounding lands, as well as the socio-economic effect, cannot be considered piecemeal.

Six areas identified in RARE II appear to be candidate sites on forest lands which deserve further consideration. This study can be accomplished when the other federal agencies have identified their candidate areas. These forest land sites are: Arc Dome area 4-667, Ruby Mountain area 4-367, Mount Wheeler area 4-359, White Mountain areas 5-058 and 5-296, and Jarbidge extension area 4-372. I recommend that these areas be placed in a Further Planning category.

In order for the State of Nevada to properly consider its position with regard to specific wilderness area proposals, we must examine the impact on surrounding areas and the overall federal wilderness proposals in our state. Until we have the recommendations from other agencies, no final decision should be made.

Mr. Vern Hamre
September 28, 1978
Page Two.

At such time as the complete national government package of recommendations has been made, the State will be in a position to make one set of recommendations.

I urge you to insure that the Forest Service in Nevada full coordinates its efforts with other federal agencies to present a single set of recommendations for wilderness areas at an early date.

Sincerely,

Mike O'Callaghan
Mike O'Callaghan
Governor of Nevada

V-24

STATE OF NEVADA
EXECUTIVE CHAMBER

STATE OF NEW HAMPSHIRE

EXECUTIVE DEPARTMENT

MELDRIM THOMSON, JR., GOVERNOR

CONCORD



COUNCILORS
DUDLEY W. DUGLEY, DURHAM

RAYMOND S. BURTON, BATH
LOUIS D'ALLEBRAND, MANCHESTER

MALCOLM McLANE, CONCORD
BERNARD A. STREETER, JR., NASHUA



September 2, 1978

Mr. Steve Yourich
Regional Forester
Eastern Region, Forest Service
633 W. Wisconsin Avenue
Milwaukee, Wisconsin 53203

Dear Mr. Yourich:

SEP 25 1978

As Executive Councilor for District One, which covers 62% of the land area of New Hampshire, I would like to hereby register with you some thoughts relative to the future use of the undeveloped Eastern Region Areas of the White Mountain National Forest.

1. I object strongly to having the entire decision made by the United States Congress. Generally speaking the forestry management does a good job in caring for and preserving our forests.
2. I stand for multiple use of our public lands. It appears that there is enough room for various uses if properly planned and in accordance to what the land in a given area will support.
3. There should be lands held by the public available for snowmobilers, fishermen, hunters, hikers, canoeists, bird-watchers and lumber harvesting.

Thank you for your time and interest.

Sincerely yours,

Raymond S. Burton
Executive Councilor

RSB:snk



JERRY APODACA
GOVERNOR

STATE OF NEW MEXICO

OFFICE OF THE GOVERNOR

SANTA FE

87503

September 22, 1978

Mr. M. J. Hassell
Regional Forester
U.S. Forest Service
117 Gold Avenue, S.W.
Albuquerque, NM 87102

Dear Mr. Hassell:

It has been extremely difficult for us to develop a responsive comment on the Draft Environmental Statement for RARE II. I am sure our difficulty in providing comment is no greater than the difficulty faced by the Forest Service of having to condense such a significant undertaking into such a short time and into such a limited number of pages. Considering the difficulty of the subject and the time allotted, we feel you did a good job.

The difficulties which we have encountered are not limited to presentation, but also include philosophy. There is concern among members of some State agencies that the necessity of classifying areas, either as wilderness or nonwilderness, is unfortunate because some of the elements which are in need of protection may not be protected under wilderness classification. It has been observed that the mere classification of an area as wilderness attracts to it a significant number of people who are not attracted to areas not so classified. This creates an administrative problem, complicated by limitations of wilderness management regulations.

Concern has been expressed with interpretations of the Wilderness Act as these interpretations are reflected in Secretarial Regulations, and the variation of interpretation of these regulations from wilderness to wilderness and from region to region. I do not feel that the concept of wilderness protection is under attack, and I certainly do not intend that my comments represent an attack on the wilderness concept. I only suggest that there is significant conflict among various wilderness philosophies, and I am sure that these philosophies vary in proportion to the number of persons who consider them.

Our previous experience with environmental statements has been with those that were limited to a single action, the consideration of which had been reduced to two or three alternatives, one of which was recommended. We can

Deputy Regional
Forester for Resources

SEP 28 1978

September 22, 1978

through wilderness designation. We plan to reserve our final comments on specific areas until the Forest Service recommendations are published in the final EIS, at which time we will seek to identify from the best available information whether the potential for mineral or energy development in the designated wilderness areas is significant.

In considering the RARE II process, it appears that need for wilderness has been assumed rather than demonstrated. One of the primary uses of wilderness is recreational. If this point can be accepted, it is necessary to consider the quantity and quality of recreational opportunity needed and available on national forest lands and how this need will be affected by wilderness classification.

In considering the impacts of wilderness classification on wildlife, it is necessary for us to review the impacts of currently classified wilderness areas on wildlife management. The position of those persons who advocate no management in wilderness areas can be appreciated and, certainly, if a total ecosystem not affected by man could be established, then the balances or classic imbalances of nature that affect wildlife could be permitted. It must be recognized, however, that the continued use of the wilderness areas by man does have an impact on wildlife populations that require continued husbandry, and quite frequently the regulations associated with wilderness management prohibit or interfere with this activity to the extent that wildlife is not necessarily benefited by wilderness classification. The identification of a limited number of species as "wilderness wildlife" is a subjective judgment and overlooks the fact that a wildlife ecosystem is made up of all species of wildlife which occupy that ecosystem and interact there with each other and with their food supply. In all areas affected by man's activity it is necessary for man to compensate for these activities in whatever way is indicated, thus the management of wildlife, even in wilderness areas, is necessary to their welfare.

My office has received quite a bit of correspondence from all segments of the public sector commenting on the effects of wilderness classification on their daily lives, as well as the local economy. Outstanding among these is correspondence from citizens from the southwestern part of the State who feel that need for wilderness in that area has been more than satisfied.

Taking the narrative which is presented here into consideration, the recommendations of the State of New Mexico are as follows:

1. The roadless area evaluation process be considered complete. The final impact statement include specific recommendations to the Congress of areas proposed for wilderness classification. The remainder of the areas be returned to multiple-use status.
2. The areas recommended for classification be limited to those of low resource value, except in those situations where need for wilderness can

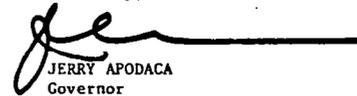
September 22, 1978

be demonstrated. Need, in this case, would include unique ecosystems or features which are in danger of being destroyed if normal multiple-use practices are allowed.

3. Any further consideration of areas for inclusion in the wilderness preservation system be conducted under specific Congressional authorities.
4. The welfare of the total citizenry of the State of New Mexico be considered in the decision-making process.

If any of my staff or members of any State agency can assist you in your further evaluation of this question and in the preparation of the final statement, please know that we are available, because we recognize the magnitude of the job with which you are faced and the significant impact which it may have on the State of New Mexico.

Sincerely,



JERRY APODACA
Governor

JA:wsh



STATE OF NORTH DAKOTA

EXECUTIVE OFFICE
BISMARCK

ARTHUR A. LINK
Governor

August 31, 1978

The Honorable Bob Bergland
Secretary of Agriculture
U.S. Department of Agriculture
Washington, D.C. 20250

Dear Secretary Bergland:

The following is the position of the State of North Dakota with regard to the Roadless Area Review and Evaluation (RARE II) which is currently being undertaken by the U.S. Forest Service. Additional comments are also being prepared by a number of North Dakota Natural Resources Council Agencies under the official A-95 Review process.

The RARE II Draft Environmental Statement and North Dakota Supplement indicate that twelve (12) additional areas in western North Dakota have the potential of designation as "wilderness areas" and are to be incorporated into the National Wilderness Preservation System. If these areas in the Little Missouri Grasslands are designated as wilderness, unnecessary economic and environmental hardship will be imposed on the citizens of western North Dakota and state government. The following are problems that have been identified as indicative of the difficulties that would result if these areas were to be designated as wilderness:

1. As a result of the illegality of motorized vehicle usage in a wilderness area, adequate access to state or privately owned lands within the twelve designated areas would not be permissible.
2. While grazing would appear to be allowed, it would diminish or become entirely extinguished in the twelve areas because livestock improvements, such as adequate watering systems, could not be maintained.
3. Responsibility for a system of prevention and control of fires in the grasslands is not clearly indicated.
4. The usage of necessary pesticides and herbicides would be prohibited in the areas.
5. Recovery of valuable mineral resources (coal, oil, gas and uranium resources) would be eliminated.

The Honorable Bob Bergland
Page Two
August 31, 1978

As Governor and Chairman of the North Dakota Natural Resources Council, I cannot support RARE II as it pertains to North Dakota. I would oppose the designation of any of the twelve proposed areas in western North Dakota as "wilderness" by the U.S. Forest Service. However, I will continue to support multiple use management by the Forest Service in North Dakota as provided under the previous Little Missouri Grassland Study and the Badlands and Rolling Prairies Management Plans. These original management plans are highly effective and any deviation from or duplication of these efforts is clearly unjustified at this time.

I also support the extension of the public comment period 60 days beyond the original October 1, 1978, deadline. I believe this is necessary to insure adequate public participation and reaction to RARE II.

I trust that you will take our position into serious consideration in your evaluation of RARE II in North Dakota.

Sincerely yours,

ARTHUR A. LINK
Governor

AAL:rj

V-28

ROBERT W. STRAUB
GOVERNOR



OFFICE OF THE GOVERNOR
STATE CAPITOL
SALEM, OREGON 97310

September 29, 1978

John R. McGuire
Chief Forester
U.S. Department of Agriculture
P.O. Box 2417
Washington, D.C. 20013

Dear John:

Enclosed are copies of Oregon state agency comments on the Oregon RARE II E.I.S. I have provided Dick Worthington with a copy of the taped record of a hearing that I held in Eugene September 13, 1978. During 13 hours, 125 people testified and additional persons appeared. From this hearing and the Oregon State agency comments I intend to develop an Oregon position that I personally can defend. As an indication of the high level of interest in Oregon about RARE II, there was a meeting in Roseburg, Oregon which attracted nearly 1500 people.

I cannot, in good conscience, endorse either extreme positions urged upon me: that all or none of the remaining roadless areas on the national forests in Oregon be recommended for designation as wilderness by Congress. I must make choices. These choices are crucial to Oregon. They must be based on accurate data. They must be based on detailed information on some specific areas.

Therefore, I am unable at this time to make the responsible recommendations that this important study demands, because of the lack of adequate information from the U. S. Forest Service in the Draft E.I.S. I understand that the data will be revised shortly after the October 1 deadline, and I feel that my decision must rest on this revised data. In addition, I ask that the U. S. Forest Service provide me specific recommendations for possible partitioning of large roadless areas possessing both subareas with high wilderness values and others with large timber volumes. I cannot make my final recommendations until the U. S. Forest Service produces the information I need.

Oregon is a bountiful state, with some of the finest natural resources in the nation -- vast forests, pure water, and the best of outdoor resources for recreation. Perhaps most uniquely, we have mountain ranges within easy reach of our population. All of us go, mostly to the Cascades, but also

John R. McGuire
Page 2
September 29, 1978

to the Ochocos, the Elkhorns, the Blues, the Willows, the Coast Range and lesser known areas. We fish, we hunt, we camp, we hike and climb. We also need these forests for our most significant economic base. And much of this bounty -- both the forests and the recreational opportunities -- is on national forest lands. That is why what happens as a result of this evaluation of our remaining unroaded areas is so important to Oregon.

The State agencies' comments and the 13 hours of testimony I received demonstrate the conflicts among citizens of this state over the management of our public lands. For example, the State Parks Branch suggests nearly 1 million acres be considered for possible wilderness designation to meet recreational needs. The Fish and Wildlife Department feels that 400,000 acres as wilderness are vital for resource habitat and that many additional management constraints should be imposed on other areas. Both the Economic Development Department and the Department of Forestry urge that no recommendations be made that reduce the commercial forest base upon which the economy of the State depends and that these lands should be managed for increased timber production. I have an obligation to balance these concerns and make recommendations that I feel will best serve the needs of all Oregonians.

Oregonians are active users of the public lands. By the thousands they retreat each weekend or holiday to little-known, favorite spots for relaxation, challenging adventures, beautiful vistas. Blessed with a reasonably moderate climate, we can enjoy these outdoor recreational resources nearly year-round. During our long tourist season, our forests and our other public lands are the drawing cards that attract millions of visitors to Oregon. Many, if not most, come for the unique outdoor experiences afforded. We must preserve a plentiful variety of quality outdoor recreation opportunities.

Wilderness, of course, is not required for many types of recreation and is inappropriate for some. But our existing wilderness areas, established in 1964 and enlarged last year, have an honored place in Oregon's outdoor tradition. They have been identified and managed to preserve their unique qualities since the 1920's when they were known as "limited" and "primitive." Later, before the passage of the Wilderness Act, they were administratively recognized as either "Wilderness" or "Wild." And those that have now been formally designated as "Wilderness" by Congress increasingly are overused. We are faced with permit systems we find restrictive, and the signs of too much human intrusion. Today, more people than ever before have the money, the time, the modest equipment and skill necessary to enjoy a wilderness experience. In addition to serving several hundred thousand back-packers in Oregon, wilderness provides day-hiking

for many more car-campers. It frequently helps preserve the high quality water so necessary for our fisheries, a resource enjoyed by Oregon's 700,000 licensed fishermen. There are 300,000 licensed hunters in Oregon. Many hunt on our wilderness and roadless wildlands, and the wildlife they seek use these lands for cover and habitat. The long-range needs of the people of Oregon require more wilderness, and the unroaded lands in the RARE II study are a portion of the finite supply of wild lands available to fill these needs.

On the other hand, these unroaded lands contain substantial amounts of harvestable timber previously untapped for management. Between 8 and 9 billion board feet of timber are harvested each year in Oregon. Of this, 2.5 to 3 billion come from the national forests. The lands currently under study in RARE II are capable of producing 384.1 million board feet. Oregon's economy is based upon timber. In many small communities of the state, it is the sole industry. Commercial forest lands that are capable of producing timber economically and on a sustained yield basis should only be designated as wilderness where there are overwhelming wilderness values.

In reviewing various candidates for wilderness status and the factual information available from the Forest Service and from my State agencies, several areas stand out as capable of producing timber from one sector, while another portion might be designated as wilderness. The Department of Forestry has identified areas as capable of boundary adjustment which would permit a portion important for timber supply to be managed to meet that need, while making the balance available for a more restricted management classification. Some of these might have a substantial impact on the state's timber supply or on a local timber shed, but they also have been appraised as meeting wilderness selection criteria, with a significant capability for serving recreational or fish and wildlife needs.

I would ask that your staff develop several partition proposals designed to protect the commercial forest base, while preserving the wilderness values for each of the following areas:

- 6095 Salmon-Huckleberry
- 6132 Windigo-Thielsen
- 6253 North Fork of the John Day
- 6273 Twin Mountain *
- 6106 Waldo
- 6097 Badger

* I am particularly interested in a management scheme for this area which will assure protection of the Blue Mountain ridge trail along the Elkhorns.

Convincing testimony was presented to me urging classification of the Joseph Canyon area as wilderness. I would like the U. S. Forest Service to re-examine their land use planning decisions and reconsider this area for wilderness.

When I have had an opportunity to review the partitions you can suggest and the most accurate data available, I can confidently make my recommendations as to which lands in Oregon I believe should be added to the wilderness system.

To a minimum extent, these will negatively impact our timber supply. I would emphasize that we in Oregon cannot accommodate erosion of our timber base without suffering economic repercussions. However, we do have some untapped capability to redress such losses.

Although significant and commendable improvement has been made in recent years in the management of national forest lands, most of these lands in Oregon are still under-managed. It is important that these lands obtain the full funding required to meet RPA goals. These lands are now understocked or unstocked. They would profit from thinnings and fertilization. They are neglected by the Forest Service because of the lack of funds and manpower for intensive management. With prudent planning, determination and the cooperation of Congress in appropriating sufficient funds, any loss of harvest we suffer from wilderness designations can be compensated through the intensive management on other more productive and already roaded national forest lands. I have worked extremely hard and with some success in urging this course on Congress and the Administration. I pledge my continued efforts to do so.

Other values in addition to timber are noted in some of the enclosed analyses and statements. Oregon has minimal deposits of presently exploitable mineral resources. In cases where deposits are identified and economically viable, they should be a consideration in the wilderness decision. Grazing, watershed values, and wildlife habitat needs also deserve consideration. However, designation as wilderness does not exclude grazing or hunting. Although no timber harvest and no exploitation of mineral resources unlocated before 1983 are permitted, wilderness lands are not unmanaged. They are instead managed to permit people, livestock and wildlife uses, restricted only to the extent necessary to assure that the wilderness values be maintained. Where cattle grazing is a significant activity, I would recommend its continuance at an appropriate level.

John R. McGuire
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September 29, 1978

I would like to avoid the designation of "areas for further study." I feel that prolonging the decisions on many of these areas is counter-productive. In some cases, however, studies are currently authorized or under way. In those cases, I do not expect to include a comment in my recommendations with respect to RARE II areas. I endorse studies for Bull of the Woods and Boulder Creek, two areas Congress has indicated for further study, as needed to define appropriate boundaries and to assess economic impacts as well as wilderness values. Also being studied pursuant to other federal directives are the areas in and adjacent to the Hells Canyon Recreation Area and the Lower Minam. Again, I do not believe that comment within the RARE II process is appropriate.

I especially want to draw to your attention State agency comments about desirable and alternative levels of management. Some instance characteristics relating to the special needs of Oregon hunters and fishermen, as well as hikers, back-packers, skiers, and others who enjoy and use the outdoors. Others describe possible adverse impacts on communities now designated as economically lagging areas, in many instances because of declining timber supplies. The State Parks Branch has recommended that some areas not be designated wilderness because of their particular value for more developed types of recreation. With the possible exception of Metolius Breaks, I am inclined to agree with their recommendations.

I will appreciate your providing the additional information I have requested, and pledge my continued cooperation in order that your study may be promptly concluded and reported to Congress.

Sincerely,


Governor

RWS:bh



STATE OF SOUTH DAKOTA

EXECUTIVE OFFICE

PIERRE
57501

HARVEY WOLLMAN
GOVERNOR

September 11, 1978

Mr. Craig W. Rupp, Regional Forester
United States Department of Agriculture
11117 West 8th Avenue
P.O. Box 25127
Lakewood, Colorado 80225

Dear Mr. Rupp:

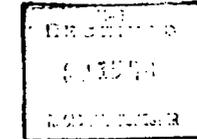
The State of South Dakota has completed its review of the U.S.D.A., Forest Service Draft Environmental Statement concerning the Roadless Area Review and Evaluation (Rare II), and our recommendations follow:

The area identified as the Norbeck be allocated to wilderness and the remaining four areas to responsible multiple use management for the maximization of all potential uses.

We support designation of the Norbeck area as wilderness. This area of all the South Dakota areas can be best transformed into wilderness. Because of certain human influences, practices will have to be implemented to give this appearance of an undisturbed area. We recommend management of the Norbeck wilderness include the following criteria: 1) the non-indigenous mountain goat population, and all other resident wildlife, be maintained under authority of the state. 2) existing road cuts and fills be obliterated. 3) midway picnic area be removed and obliterated. 4) the Lost Cabin-Pine Creek barbed wire fence be removed. 5) system trails be evaluated and inappropriate trails obliterated. 6) visitation be controlled to maintain a quality wilderness experience. 7) natural occurring elements be allowed to return the area to 19th century conditions while maintaining protection of adjoining federal, state and private land.

Should it not be possible to manage the Norbeck area as a quality wilderness due to physical, legal, financial or environmental limitations, we would prefer this area continue to be managed as a natural area reserved from normal timber management practices and timber managed for esthetics and wildlife production

As to the three designated grassland areas identified as Red Shirt (9,520 acres), Cheyenne River (8,010 acres) and Indian Creek (24,670 acres), the State recommends these areas be managed under multiple use with emphasis placed on those practices that provide maximum on-site public benefits. Current management of the aforementioned grassland areas overemphasizes grazing of domestic livestock.



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Mr. Craig Rupp
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September 11, 1978

A substantial reduction in AUM's is necessary to accomplish on-site public benefits. Improved management practices, including continued maintenance of existing stock dams and roads should be encouraged. However, vehicular traffic for non-management should be rigidly controlled and restricted. If provided only the choice between current management and wilderness, the State would endorse the wilderness designation.

The State recommends that the area identified as Beaver Park not be designated as a wilderness area due to its location in the watershed of Sturgis, South Dakota, its size (5000 acres), private inholdings and other factors. This area should be managed under multiple use with maximized benefits for all potential uses.

The State of South Dakota supports the concept of wilderness as defined in the Wilderness Act of 1964 and definite efforts at identification of all potential wilderness land under the jurisdiction of Forest Service. We are cognizant that areas in South Dakota cannot qualify for wilderness under the more rigid standards of the '64 Act. However, under the more liberal criteria of (Rare II), it is our contention that the Norbeck area, with the management criteria previously stated, will qualify and should be designated as wilderness area under Rare II.

The State of South Dakota appreciates the opportunity to provide opinions of suitability of identified areas for inclusion in the National Wilderness Preservation System.

Sincerely,


HARVEY WOLLMAN
GOVERNOR

HW:jrd

cc: Members of the Natural Resource Cabinet Subgroup



OFFICE OF THE GOVERNOR

DOLPH BRISCOE
GOVERNOR

September 22, 1978

Mr. John H. Courtenay, Forest Supervisor
National Forests in Texas
P. O. Box 969
Lufkin, Texas 75901

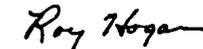
Dear Mr. Courtenay:

The Draft Environmental Statement Roadless Area Review and Evaluation II has been reviewed by interested State agencies. Your Environmental Impact Statement Number is 8-006-027.

Comments were submitted by the Texas Parks and Wildlife Department, the Public Utility Commission of Texas, the University of Texas Bureau of Economic Geology, the State Department of Highways and Public Transportation, the Texas Department of Water Resources, the General Land Office, the Texas Natural Resources Council, the Texas Department of Agriculture, the Texas Forest Service, and the Texas Tourist Development Agency. Copies of these comments are enclosed for your information.

If this Office can be of further service in this matter, please contact me.

Sincerely,



Roy Eogan, Assistant Director
Budget and Planning Office

Enclosures

RICHARD A. SNELLING
GOVERNOR



STATE OF VERMONT
EXECUTIVE DEPARTMENT
MONTPELIER, VERMONT

September 29, 1978

Mr. Steve Yurich
Regional Forester
U. S. Forest Service
633 West Wisconsin Avenue
Milwaukee, Wisconsin 53203

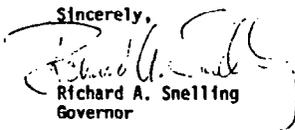
Dear Mr. Yurich:

Transmitted, herewith, is a statement outlining the position of the State of Vermont with respect to the Roadless Area Review and Evaluation II for the identification and allocation of wilderness areas on the Green Mountain National Forest.

We are pleased to have had the opportunity to participate in the Review, and are hopeful that the recommendations made will be helpful to the Forest Service and the United States Congress in arriving at wise decisions for the management of the National Forest in this state.

We again offer the full support and cooperation of the State of Vermont to the Forest Service in the administration of the Green Mountain National Forest.

Sincerely,


Richard A. Snelling
Governor

RAS:wgs
Enclosure
cc: Senator Stafford
Senator Leahy
Mr. Jeffords
Mr. McGuire
Mr. McArdle

OCT 2 1978

ROADLESS AREA REVIEW AND EVALUATION II

FOR

THE GREEN MOUNTAIN NATIONAL FOREST

Statement from: The State of Vermont

I. INTRODUCTION

The State of Vermont fully supports the concept of wilderness and the need for identification, classification, and dedication of wilderness areas in the National Forest System in general, and on the Green Mountain National Forest in particular. Wilderness is one of the many proper uses of the public lands and should be one of several primary considerations in the land use planning process.

The State is in favor of the full range of appropriate uses for the lands within the Green Mountain National Forest including unspoiled roadless areas where human intrusion is limited.

The real issues raised by "Rare II" are not the desirability of wilderness in the abstract but rather by what process wilderness shall be designated and set aside, how much wilderness is appropriate, in Vermont, what criteria should be used in evaluating wilderness and following that which specific areas should be considered. It is the position of the State of Vermont that these issues are not satisfactorily addressed in the "Rare II" proposal.

In making wilderness designations, recognition must be given to the variety of definitions and the very personal, subjective nature of this concept: ranging from the highly refined vision of the "purist" to the broad and general idea of the urban and rural dweller who may be barely familiar with the term.

Wilderness has been described historically in terms of size, "roadlessness," land use, ecological systems and in terms of human experience among others.

The planning and designation process followed on National Forest land should provide for a mix of opportunities to offer the diversity of experience under the general heading of "wilderness" necessary to satisfy public needs. These

V-33

with the following facts noted:

(a) The mineral resource potential of the proposed areas has not been explored adequately. Before such areas are closed to such possible uses, the potential should be analyzed.

(b) Wildlife habitat management would be prohibited in the proposed areas although hunting and fishing would continue to be permitted. The extent to which this prohibition would affect hunting and fishing opportunities has not been quantified; however, observation and experience would indicate that a reduction in the numbers and diversity of wildlife would occur. No specific allowance has been made for trapping.

(c) Recreation restrictions would have some significant impacts locally, particularly in the use of snowmobiles. Concerns also have been expressed for maintenance and use of shelters on the Appalachian and Long Trails.

A 1973 UVM report, SNR-RM2, entitled Outdoor Recreation Conflict in Vermont states that only eight percent of respondents to a survey indicated that "too many people were the cause of their own recreational conflicts". Discourtesy, safety, trespass, and littering were cited as most-common causes of conflicts. Ninety-nine percent indicated that registration of users in a particular area was the least popular solution.

(d) Clean Air Act implications:

(1) Proposed RARE II Wilderness Areas are presently designated as Class II and may remain as Class II even if changed to wilderness status.

(2) If changed to wilderness status, those tracts larger than 10,000 acres would not be eligible for Class III designation.

(3) Any redesignation of an area classification under the Clean Air Act is a State option.

(4) Provided the State did not choose to change Class from II to I, making these areas wilderness areas would have no effect whatsoever on review of new sources for air quality permits.

(5) A wilderness designation of the RARE II areas in New Hampshire would cause little impact on industrial development in Vermont.

(6) Designation of RARE II areas in Vermont or New Hampshire will not cause mandatory retrofit of control devices on any existing Vermont industry due to visibility impacts.

(7) Future requirements of a visibility protection plan for Vermont in mandatory Class I areas are not increased.

(c) Potential timber production losses, estimated at 3,700,000 board feet per year, resulting from wilderness designation would be relatively minor viewed from the statewide perspective. However, the approximately 49,000 acres of commercial forest land removed from production could have a significant impact on certain local wood-using industries dependent upon The National Forest for timber supplies. It may be difficult for those local parties so affected to understand and accept such "sacrifices" unless a satisfactory explanation were made and other adequate sources of raw materials for industry were identified.

(f) The capital investment and administrative carrying costs of classifying and holding public land as wilderness and in non-productive condition has not been addressed.

III. CONCLUSIONS

(1) Wilderness in Vermont is supported conceptually as a desirable and necessary use of public lands.

(2) There are growing demands for the allocation of all forest resources on both public and private lands. These pressures will increase.

(3) The economic effects of the proposed wilderness designation of additional areas are relatively minor on a statewide basis, but could have negative impacts on specific localities. These impacts could prove difficult to relieve.

(4) The effects of the Clean Air Act as a result of wilderness designation should be minimal.

(5) Opportunities for "wilderness" experience totaling 1,337,000 acres, are provided by other public lands in addition to designated National Forest Wilderness in Vermont and nearby states.

(6) Recreational use of public lands, including wilderness on the Green Mountain National Forest, is an ongoing joint planning effort of the State of Vermont and the U. S. Forest Service.

(7) Public land acquisition in Vermont is controlled at both the state and local levels. The uses to which such lands are put must be sensitive to both local and state perceptions.

SE-A



STATE OF WASHINGTON

Dixy Lee Ray
Governor

OFFICE OF THE GOVERNOR
Legislative Building, Olympia, Washington 98504

OCT 1 1973

STATE OF WASHINGTON

RARE II RESPONSE

SUMMARY OF RECOMMENDATION ALLOCATION

Mr. R. E. Worthington
Regional Forester
U.S. Forest Service
P.O. Box 3623
Portland, OR 97208

Dear Mr. Worthington:

Attached is the State of Washington's assessment and recommendations on RARE II.

We are recommending an allocation of the RARE II areas that is different than any of the 10 alternatives contained in the draft environmental statement. Our recommended allocation is designed to best meet the needs of our residents. It retains resource productivity and would provide optimum recreation opportunities.

I consider RARE II to be very important and urge the Forest Service to expedite the process and end the uncertainty over roadless areas.

Sincerely,

Dixy Lee Ray
Governor

Attachment

The following information summarizes the state's preferred allocation. The attached map can be used to identify the areas and the approximate boundaries where parts of RARE II areas are involved.

Allocated to Wilderness

01981
06981

Allocated to Back Country

All or parts of:	6041	6036
	6031	6071
	6050	6072
	6032	6069
	6063	6085
	6084	

Allocated to Multiple Use

All remaining RARE II Areas, including the remaining portions of those otherwise allocated.

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STATE OF WASHINGTON

RARE II RESPONSE

RECOMMENDATIONS

Washington State's Preferred Allocation Criteria

We do not find any of the ten alternatives presented to be totally acceptable. We have chosen to develop a Washington State preferred allocation of the roadless lands. The allocation is shown on the attached map. The state's allocation is based on decision criteria that we feel reflects the best interest of the people of the State of Washington.

The salient decision criteria are underlined.

1. The state has 1.5 million acres in the National Wilderness Preservation System. Washington ranks fourth among the 11 western states in providing wilderness. However, as a percentage of the state's acreage, wilderness accounts for 4 per cent. This is a higher percentage than any other state in the nation and is an adequate share for the state to contribute to this national program.
2. Some of the RARE II areas have a high mineral potential and should not be locked up.
3. Some of the RARE II areas have high timber producing potential and should not be included.
4. Wilderness, being subject to restrictive management regulations, cannot be effectively managed as a recreational resource.
5. The wilderness classification intended for use by the Forest Service does not adequately allow for public use of the resources.
6. Some of the RARE II areas are adjacent to established national parks and represent contiguous extensions of resources contained within the national parks. These areas may be studied through the normal land management planning process to determine if they should be made part of the adjoining national park. In the interim, they should be retained in "Multiple Use" status.
7. Some adjustments may be needed to boundaries of existing wilderness areas where experience has shown the boundary was not properly located to provide adequate protection or to facilitate management. These may also be identified through normal land management planning processes. In the interim, they, too, should be retained in "Multiple Use" status.

RECOMMENDATIONS (Cont'd)

8. Some areas could be added to the wilderness system to represent the 40-some ecosystems of the United States. Six of these major ecosystems are in the State of Washington. To preserve these systems in their natural state provides a useful tool for educational and scientific purposes.
9. Some RARE II areas are very large and are spread out over a wide geographical area, with varying values for timber, minerals, and recreation. Some of these RARE II areas were split up for a more effective allocation.

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BACK COUNTRY

Some of the high recreational potential areas would be best managed for road-less recreation but not under wilderness designation. We feel these areas should be managed as "back country" according to the provisions described below. The areas recommended for back country are shown on the map and listed below.

The Forest Service should ask Congress to create another land classification as an alternative to Wilderness designation or intensive management. We propose the establishment of a "Back Country" classification, with areas established as shown on the enclosed map and rules for use to be established by regulation. The primary use of these areas would be for semi-primitive recreational use and associated fish, wildlife and scenic values. The areas should be managed to provide these resources, including providing simple facilities for visitors. Silvicultural practices, including harvesting mature and decadent timber, mining, and wildlife habitat manipulation would be conducted so as to minimize, in so far as practicable, adverse impacts on these other values.

RECOMMENDED BACK COUNTRY AREAS

<u>Back Country Area Name</u>	<u>Description</u>	<u>Approximate Size (Acres)</u>
Mt. Baker	The central portion of 6041 immediately surrounding Mt. Baker.	150,000
Monte Cristo	The Monte Cristo and Glacier Basin area of 6031 extending eastward to Glacier Peak Wilderness.	85,000
White Horse Mt.	The area of 6050 in the vicinity of White Horse Mt. and Three Fingers.	20,000
Mt. Aix/Cougar Lake	The American Ridge/Cougar Lakes Mt. Aix vicinity of 6032.	140,000
Goat Rocks	Portions of 6036 that should be used to buffer the Goat Rocks Wilderness.	12,000
Mt. Margaret	The high plateau area of 6071 (southern portion).	25,000
Mt. St. Helens	All of 6072 (this is mostly the portion of Mt. St. Helens above timberline).	29,950

Back Country (Cont'd)

<u>Back Country Area Name</u>	<u>Description</u>	<u>(Acres) Approximate Size</u>
Mt. Adams	Portions of 6069 that should be managed to buffer the Mt. Adams Wilderness.	28,000
Mt. Washington/ Mildred Lakes	Most of the alpine areas of 6085.	20,000
Lena Lake/ The Brothers	The portions of 6084 surrounding Lena Lake and The Brothers.	15,000
	TOTAL	524,950

Areas generally endorsed for Back Country designation which have intermingled ownerships should not be put into that classification until the lands in other ownerships are acquired.

Wilderness Additions

While our position has been that there should not be any new wilderness areas established in the state, we are recommending designation of the Salmo Priest unit (6981 and 1981) as wilderness. The Salmo Priest is an extension of a much larger habitat for moose and caribou lying mostly in Canada and is the only range for these animals in Washington State. Even though the area is not a vitally necessary part of the animals' range, it is considered important to the people of Washington to maintain this area for moose and caribou.

No other additions to wilderness are being recommended nor are areas being recommended for future study as wilderness.

conflicts?

The continuing expansion of energy development and land development into Wyoming's wildlife habitat required that the Game and Fish Department's evaluation be given a major role in my decisions.

In arriving at the final decisions regarding the Wyoming's recommended state alternative, the extensive information provided by the task force and the numerous public comments and responses received by my office during the last 12 months were closely analyzed. My recommendations are set out in detail in the attachment to this letter. They may be summarized as follows:

	Acres	% of RARE II areas	% of Total acres
Total RARE II areas recommended for non-wilderness. . . .	2,956,360	88	77
Total RARE II areas recommended for further planning. . .	819,075	10	21
Total RARE II areas recommended for wilderness.	80,396	2	2

The rationale for the state alternative consists of several critical components. Those areas designated non-wilderness are areas with high resource values such as minerals, oil and gas, potential water development, grazing, recreation, timber or wildlife habitat. Based upon the past U.S. Forest Service's management plans, and reports, the extensive information provided by the task force and the public responses, utilization of the resources these areas contain was considered necessary to meet immediate and long-term resource needs of Wyoming and of the nation. Wyoming's economic sector is inseparably connected to the long-term use and development of these resources.

The fact that Wyoming has the largest concentration of wilderness areas in the nation also was considered by me to be an important factor. The U.S. Forest Service management efforts, under the guidance of numerous planning regulations, the National Forest Management Act and the Resource Planning Act has adequately planned for and managed the multiple use of many of the National Forest areas. With increased intergovernmental cooperation and increased flexibility within the U.S. Forest's planning regulations, I am confident that these areas can be effectively managed to provide for our long-term resource needs and protect the existing high quality of National Forest lands.

The areas recommended for further planning and study are those with a real conflict between high wilderness values and high resource values, and we do not now have sufficient data concerning the potential resources and the need to make a firm recommendation. A decision to designate them as immediate wilderness areas would be irreversible and would prevent securing the information necessary to the making of informed decisions. I recognize that Wyoming may have areas which are as well qualified for wilderness designation as the 26% of our national forest lands in Wyoming already classified as wilderness or primitive areas. I believe that parts of some of the very large areas, as for example the Gros Ventre Area should be considered seriously for wilderness designation, but I cannot justify designation of the entire area as wilderness. I do not have sufficient information at this time upon which I could base a recommendation for any smaller areas.

Until more intelligent decisions can be made regarding the resource tradeoff involved in designating new areas as wilderness in Wyoming, it is my position that the U.S. Forest Service should continue to manage our forest in a systematic and balanced manner protecting all resources and preserving all values as completely as possible.

With respect to the areas which I recommend for wilderness designation: I have previously recommended wilderness designation for the "Corridor" tract (No. 04101) near the Elk Refuge. I felt that an additional wilderness area such as the Snowy Range Area (No. 02074) in the Southeast Quarter of the state, in which most of our population lives, could be of greater benefit than a similar area of the same size in the western part of the state. Gypsum Creek, (No. 04116) the remaining tract is in close proximity to an existing wilderness area, which should simplify administration. Finally, in all three cases it appears that the wilderness designation will not materially interfere with utilization or management of vital natural resources.

The third phase of RARE II has been a long and difficult process. I hope the state alternative and the supplemental information provided by the state task force will help in the preparation of the final environmental statement. I request that you continue to allow the State of Wyoming to participate in the final phase of RARE II.

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Mr. Craig W. Rupp
September 29, 1978
Page 7



American Association of Petroleum Geologists

Thank you for the opportunity to review the draft EIS, please notify me if you have any questions regarding the state's position.

Yours sincerely,
Esther...

EH/trj

attachments

cc: The Honorable Cecil D. Andrus
The Honorable Vincent E. Mckelvey
The Honorable Malcolm Wallop
The Honorable Clifford P. Hansen
The Honorable Teno Roncalio
The Honorable Bob Bergland
The Honorable James Schlesinger

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1978-79

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Executive Director
Fred A. Dix, Jr.

September 8, 1978

Mr. Darold Westerberg, RARE II Coordinator
Forest Service
11177 West 8th Avenue
P.O. Box 25127
Lakewood, CO. 80225

Dear Mr. Westerberg:

At various times during the past 27 years I have made detailed geological studies of the Piceance and Denver basins, I have been teaching petroleum geology at Colorado School of Mines since 1955, and I am a member of the Colorado Oil and Gas Conservation Commission. Several recent studies, in cooperation with my consulting partners, James A. Barlow, Jr. and L.A. McPeck, relate specifically to Region 2 roadless areas (RARE II).

Our knowledge of areas discussed in the following paragraphs indicates that there is no necessity for "further planning" and the areas should be classified as "nonwilderness."

White River and Grand Mesa National Forests

The enclosed map shows the relationship of wilderness areas 2181 through 2195 to oil and gas fields, oil shale, and coal. Essentially all of these areas are covered by oil and gas leases.

Area Nos. 2181, 2182, 2183, 2184, 2185, 2191 (south 35%) and 2195 are in areas of surface or near-surface coal deposits in or near the Carbondale, Coal Basin, Somerset, and Grand Mesa coal fields. Many billions of tons of coal remain to be mined from the Mesaverde Formation in these areas and they should not be designated as wilderness until the economically minable coal has been produced. Also, there is deep gas and oil (?) potential of undeterminable magnitude in these areas.

Area Nos. 2186 through 2194 are adjacent to natural gas fields. In fact, a small quantity of gas has already been produced from some of these areas. The following table summarizes an analysis of nearby gas fields and is the basis for estimating the quantity of gas yet to be developed on the roadless areas (BCF=billion cubic feet). Past production plus proved reserves equals ultimate reserves or ultimate production.

Estimated Natural Gas Reserves

Gas Field Name	Ultimate Prod. BCF (1/1/77)	*Reserves per well BCF	*Number of wells anal.	Ultimate reserves in wells analyzed
Wolf Creek	17	2.0	x 7	= 14.0
Divide Creek	60	4.5	x 13	= 58.5
Buzzard Creek	8	5.3	x 1	= 5.3
Plateau Creek	<u>10</u>	0.5	x <u>13</u>	= <u>6.5</u>
Total	95		34	84.3 BCF

*Data from L.A. McPeck (unpublished)

$\frac{84.3}{34} = 2.5$ BCF per gas well

The following table shows the number of acres that are potentially gas productive.

Roadless Areas	Net Areas
2186	40780
2187	6850
2188	9920
2189	27120
2191	66677 (northern 65%)
2192	10880
2193	36800
2194	10400
Total	209427 = 327 sections (640 acres)

If 163 sections (50%) become gas producing and 2 wells are completed per section (with reserves of 2.5 BCF/well), the ultimate gas reserves are computed as follows:

$163 \times 2 \times 2.5 = 815$ BCF

These reserves are based on a 20-year producing life and, therefore, are conservative estimates. Some wells will produce for 30 to 50 years and will increase the ultimate production considerably. If we assume an average well-head price of \$2.50 per thousand cubic feet (MCF), the value of 815 BCF is more than two billion dollars. The average well-head price per MCF during the next 20 years may be considerably higher than \$2.50.

No estimates of undiscovered oil or gas resources at depths greater than 10,000 feet have been made. Only 4 wells in the general area have been drilled to this depth. Regional geological information indicates that deeper formations (10,000 to 20,000 feet), in fact, do have a potential for oil and gas production. It should be noted also that area Nos. 2191 through 2195 contain oil shale.

Specific comments on roadless areas are as follows:

No. 2186 is an obvious area of natural gas and coal potential.

No. 2187 overlaps the Divide Creek gas field and contains near-surface coal deposits.

No. 2188 contains near-surface coal deposits and is in an area of obvious natural gas potential.

No. 2189 is adjacent to gas-producing areas which, after full development, may eventually occupy much of the area.

No. 2191 contains, in its northwest part, the shut-in Leon Creek gas field which may expand into much of the northern part of the area after deeper drilling has been conducted.

No. 2192 is occupied by the western part of the shut-in Leon Creek gas field.

No. 2193 is surrounded by small gas fields. The entire area eventually may be gas productive.

No. 2194 is immediately south of the extensive Plateau gas field. Geological analysis indicates that the field will extend into this area.

Routt National Forest

All of No. 2097 (48,543 acres) and the southwestern part of No. 2098 (62,100 acres) are within a potentially gas-producing area that is entirely covered by existing oil and gas leases.

Pawnee National Grassland

Nos. 2309 and 2329 are in areas of very sparse drilling -- the oil and natural gas potential of deeper formations has never been tested. These areas should not be designated as wilderness until more thorough exploration indicates that oil and gas are not present.

No. 2328 is an area with one deep dry hole and, therefore, has slightly less oil and gas potential than near-by portions of the Grassland.

Final Comments

It has been suggested that some of these roadless areas could be developed for oil and gas by directional drilling from locations outside the areas. This suggestion is obviously absurd; it would require drilling in lateral directions for distances of from one to five miles (in addition to the required depth) and wells would cost millions of dollars. Oil and gas resources would not be developed if directional drilling was a necessity. (In some offshore areas in the world the value of the oil and gas is so great that directional drilling is economically justified -- not the case

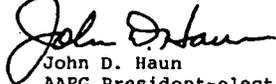
Mr. Darold Westerberg

-4- September 8, 1978

in Colorado!)

Oil and gas exploration and development generally is nondestructive of wilderness characteristics. Roads and drilling locations can be reclaimed and returned to their original condition. Anyone who has attempted to relocate abandoned wells drilled 10 to 30 years ago in mountainous areas can attest to the great difficulty of finding many of these locations. The time to make these "roadless" areas wilderness is after the oil and gas resources have been produced.

Yours very truly,


John D. Haun
AAPG President-elect

JDH:ms

Enc.

xc:Executive Committee
Other interested people

V-45

American Land Development Association, 604 Solar Building, 1000 16th Street, N.W., Washington, D.C. 20036 Phone: (202) 659-4582



September 29, 1978

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The Honorable John R. McGuire
Chief, U.S. Forest Service
Department of Agriculture
PO Box 2417
Washington, D.C. 20013

Dear Mr. McGuire:

The American Land Development Association (ALDA), which represents the nation's leading developers of recreational, resort and residential real estate, has reviewed the Draft Environmental Statement involving the Service's on-going Roadless Area Review and Evaluation (RARE II) Study. We respectfully offer these comments regarding the proposed "decision criteria" contained in the draft statement.

ALDA supports the proposed criteria in general, particularly Numbers 1, 3 and 4. However, the Association feels that an eighth criteria should be adopted and given primary emphasis, along with Numbers 1, 3 and 4, in the RARE II decision-making process:

8. Areas with high potential for organized snow-related recreation will receive priority consideration for allocation to nonwilderness so that the resource may be realized to the fullest extent possible.

Our ski area developer/operator members, who comprise more than 10 percent of the Association's membership, feel there is growing evidence that skier demand is beginning to out-strip ski area capacity, and that few, if any, feasible ski area sites are available either in private or other governmental ownerships. Instead, the vast majority of suitable areas for new development or expansion of present facilities are located within the roadless areas of National Forests. If these few suitable sites are included in the wilderness system, the resulting impact upon future growth of the ski industry will be devastating.

We would point out also, Mr. McGuire, that such decisions will affect local communities as well, since the economies of many communities are directly related to -- and dependent upon -- existing ski areas located nearby.

Accordingly, the American Land Development Association respectfully requests your favorable consideration of the addition we have proposed to the list of decision criteria which the Service will use in developing its proposed action in the final Environmental Statement for RARE II.

Thank you very much for allowing us this opportunity to comment on this important study.

Sincerely,

Gary H. Terry
 Gary H. Terry
 Executive Vice President

GAT/elg



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September 25, 1978

Mr. John R. McGuire
 Chief
 Forest Service
 U.S. Department of Agriculture
 P.O. Box 2417
 Washington, D.C. 20013

Dear Mr. McGuire:

The American Mining Congress has previously commented on the RARE II draft environmental impact statement. We wish to supplement these comments with additional observations on alternatives that would facilitate exploration and development of minerals on lands placed in the categories of "further study" and recommendations for wilderness designation.

In our letter of August 30 we stressed the need for selection of programs that would not restrict access to mineralized lands.

Little is known of mineralization in RARE II areas. Much of it undoubtedly has significant potential for discovery and development of essential minerals. The areas identified in the draft EIS as having known or high potential for minerals only scratches the surface. There is much more to be learned.

The mining industry's principal concern is that there be access for mineral exploration and development to RARE II lands recommended for wilderness designation or placed in the further study category.

Areas recommended for wilderness designation

The Wilderness Act of 1964 made it explicit that mineral exploration and development are a priority use of the public lands and that minerals are important to the welfare of the nation.

We suggest for those areas recommended for addition to the National Wilderness Preservation System that the mining and mineral leasing laws be made applicable for a period of 20 years beyond the date that these lands are included in the system. During the time existing

Continued.

mining uses and mineral leasing should continue under provisions of the mining and mineral leasing laws. Also, during this period mineral surveys should be conducted by the U.S. Geological Survey and Bureau of Mines or by contract and it is paramount that mineral development, access, exchange of lands, and ingress and egress for mining claimants be guaranteed.

Not only should access be guaranteed but it should be granted on a timely basis.

Using the format of existing Forest Service regulations governing locatable minerals plans of operation for exploration and development should include a reasonable balance between environmental protection and activities necessary to conduct such work.

Surface geological mapping, geochemical and geophysical exploration can be accomplished without construction of trails and roads. Helicopters can be used to transport equipment, personnel and supplies to remote locations. Drilling operations can be undertaken subject to requirements of best practicable restoration and revegetation upon cessation of operations.

Operators must be assured that if economically minable discoveries are made that they will be permitted to develop these resources.

Areas regarded as having mineral potential that have been identified by the Forest Service as being suitable for classification as wilderness should be allocated to further planning in order that more accurate data on the mineral potential of these lands may be obtained.

Further planning category

It is essential that lands placed in the further study category be studied in a timely fashion and that a mineral survey conducted by the U.S. Geological Survey and U.S. Bureau of Mines or by contract be an integral part of this study. We suggest that a 5-10 year limitation be placed on retention of lands in this category and that a decision be made at the end of this period to either return the lands to multiple use or to recommend them for wilderness designation.

Forest Service surface management regulations applicable to locatable minerals are more than adequate protection for these lands while they are being studied.

Continued.

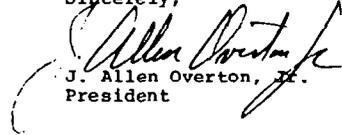
Certainly, these lands should remain open to operation of the mining and mineral leasing laws. Mineral development, access, exchange of lands, and ingress and egress for mining claimants should continue as currently practiced on national forest lands open to mining.

The Forest Service surface management regulations will assure environmental protection while permitting reasonable and legitimate exploration efforts to take place.

Restrictions on the study areas should by no means be more stringent than in a wilderness area.

We appreciate the opportunity to bring these additional views to your attention.

Sincerely,


J. Allen Overton, Jr.
President

cc: Mr. Tom Nelson
Associate Chief
Forest Service

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ROADLESS AREA REVIEW AND EVALUATION
U.S. FOREST SERVICE

Comments of the
American Motorcyclist Association
September, 1978

I. INTRODUCTION

Since the formalization of the National Forest System by the passage of the Transfer Act of 1905 and the subsequent policy statement by the Secretary of Agriculture Wilson, our nation's forests have been managed in a manner that would provide "the greatest good for the greatest number of people." This management philosophy was formalized in the Multiple-Use Sustained Yield Act of 1960 by requiring national forests to be administered for purposes of recreation, range, timber, watershed, and fish and wildlife purposes. The Wilderness Act of 1964 included wilderness as one of these resources to be managed for "the greatest good..."

In recent years, however, the wilderness theme has been allowed to dominate management programs related to our national forests to the point that other land allocation decisions are all predicated on this single resource commitment. In all too many instances timber, recreation, grazing, and wildlife decisions have been forced into a holding pattern because certain segments felt that inadequate consideration had been given to the wilderness resource. In many instances, large expanses of land have been withheld from dispersed use or timber harvest pending settlement of a long line of court cases. No longer are the forests being managed for the greatest good for the greatest number; but seemingly for the greatest good for the greatest number of wilderness areas. All too frequently, land use decisions are being made in the courts rather than through the integrated planning process.

The first Roadless Area Review and Evaluation (RARE) conducted in 1972 proved totally inadequate as a measure to identify candidate areas for incorporation into the National Wilderness Preservation System (NWPS). As a result of its shortcomings and the ever increasing challenges to management decisions, we are now faced with RARE II.

As a concept RARE II is much broader and more encompassing than its 1972 namesake. Under RARE II, we are faced with relaxed criteria to incorporate more possible candidate areas, greater efforts to identify wilderness in the eastern United States, and expanded public input. However, even with all these improvements RARE II suffers from shortcomings similar to those that plagued the original RARE. RARE II remains a single use form of incremental planning that fails to include adequate consideration for other forest users and their relationship to the total NWPS.

The major purpose of RARE II is identified as making recommendations concerning the roadless areas necessary to round out the National Wilderness Preservation System and to determine those roadless areas

that can be immediately made available for non-wilderness uses. However, the Draft Environmental Impact Statement (DEIS) makes no attempt to suggest what part of the total contribution to the NWPS should be provided by the National Forest System nor can it offer any assurances that those roadless areas released for non-wilderness uses will be immune from court challenges that would further limit their utilization.

RARE II fails to fully consider the potential contribution to be made by the Bureau of Land Management to the NWPS in relationship to existing wilderness, administration endorsed proposals, and identified RARE II roadless areas. The BLM has only recently begun to inventory its 450 million acres for potential wilderness. In considering how much wilderness our nation can afford, we must identify the total potential acreage that is administered by all federal agencies and make a decision based upon all inclusive quantification.

II. AFFECTED ENVIRONMENTS

Physiographic Regions - Attempts should be made to avoid incorporating excessive numbers of roadless areas which represent already existing landforms included in the NWPS. Conversely those landforms not represented should be given priority.

Recreation - The greatest concerns of the AMA revolve around the treatment that dispersed motorized recreation will receive in final RARE II use allocations. Of the 131 million visitor days identified for National Forests, no differentiation is made between dispersed motorized and other dispersed recreation uses. Further, previously designated roadless areas are not normally available for motorized recreation so it becomes extremely difficult to measure the actual impacts of roadless and wilderness designations on this segment of the recreation public.

We would suggest the 1.8 million visitor days attributed to motorized inventoried areas is a conservative estimate. Motorized use would be much greater if management philosophies did not prohibit such use. Industry figures indicate an existing population of over 5.6 million off-highway motorcycles now in use. If we conservatively estimate that only half are used on forest lands, estimates of visitor/use days are doubled even though other motorized recreations are excluded.

Wilderness - By including use of wilderness and primitive areas as part of the total visitor day count for dispersed recreation, you are distorting the original intent of the Wilderness Act of 1964. Congress passed the Act to preserve the wilderness resource for future generations, not as a means of establishing opportunities for a special recreational experience. Wilderness recreation should not be a criteria for selecting candidate areas to the NWPS. The presence of recreation in wilderness is secondary to the selection and establishment of a wilderness area.

Cultural Resources - The discovery of and preservation of significant archeological and historical sites that exist within inventoried

developed recreation, dispersed recreation, grazing, and fish and wildlife. Alternative C allocates 18% of the inventoried areas to "further study." While Alternative E falls somewhat short on the wilderness targets for RARE II, it does provide a greater balance among the other characteristics.

We feel the NFS is in error by suggesting wilderness experiences would be enhanced by adding additional areas to lower user density. Available information indicates that those seeking a wilderness experience only penetrate the fringe of established areas. Those who have their wilderness experience disturbed by user density have only themselves to blame; additional solitude is available by merely moving deeper into existing areas.

If the impacts on law enforcement in the 384 identified areas is to increase substantially because of restrictions imposed on traditional ORV areas, maybe some consideration should be given to their attractiveness as wilderness. If enforcement is to be a problem perhaps the area should be excluded. Such a phenomenon may also reflect a significant user need or desire in that given area that will be displaced perhaps unfairly by a wilderness decision. One would have to conclude that if a history of motorized recreation does not prohibit an area from wilderness consideration; then its use does not jeopardize wilderness as a resource and should be allowed to remain.

VI. EVALUATION AND DEVELOPMENT OF A PROPOSAL

Identification of a preferred course of action in the draft environmental statement requires that Forest Service policy makers give serious and formal consideration to the direction of the RARE II program much earlier in the whole process than if identification of the preferred alternative is delayed until the final environmental statement. We believe that the final program would have benefitted from this "forcing" mechanism since it would have permitted program planners and environmental statement writers to test this preliminary decision through agency reconsideration in light of subsequent public comment.

Further, identification of a preferred alternative in the draft environmental statement would focus public comment on a more narrowly defined set of issues than if the public is presented with a range of options without benefit of the Forest Service's views as to which of these constitutes the best compromise amongst competing considerations. The absence of a preferred alternative in the draft environmental statement deprives the interested public of a vital link in the exchange of ideas which the NEPA review process is supposed to entail.

To adequately address the methodology to be utilized by the National Forest Service, the public needs to know their willingness to provide alternatives for displaced activities. This "qualification" will be the true measure of the effects of each alternative.

VII. CONSULTATION WITH OTHERS

The assessment of public involvement in the RARE II process has been grossly over-rated by the Forest Service. By quoting the attendance figures of the 227 workshops the Forest Service is suggesting that workshops are a viable means for collecting public assessment. We feel some re-evaluation must occur. For the quoted attendance, the average at each meeting could not have exceeded 74 persons. This in itself is not representative of the nation's public; however, more importantly, it illustrates the weaknesses of public sessions as a means of gaining input.

In view of the importance of identifying the size and characteristics of an ideal national wilderness system and the contributions to this system of each of the federal land managing agencies, we believe this section ought to specify the substance of the consultations and coordination with other agencies and indicate how the RARE II program and environmental statement conform to the substantive agreements reached during the coordination process.

The "wilderness question" is one that involves all federal land managing agencies. The ultimate answer cannot be concluded until agreement has been reached on the finite contributions expected from each agency.

* * *

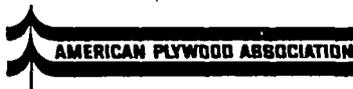
SUMMARY

In summary, the American Motorcyclist Association recognizes the importance of the preservation of wilderness as a resource and accepts the conceptual wisdom of RARE II. We seek a timely completion of the program without sacrificing other resource values for the sole purpose of expanding the National Wilderness Preservation System.

We deplore the establishment of wilderness areas for the expressed purposes of prohibiting dispersed motorized recreation and feel that RARE II is deficient for not incorporating other resource values. The Forest Service should exercise caution in determining wilderness for the luxurious reason of merely knowing it exists.

Among the alternatives offered for discussion, we favor the emphasis placed on non-wilderness allocations afforded in Alternative E. As a possible compromise, we feel Alternative C closely approximates our needs for non-wilderness designation while providing some reasonableness in the number of acres allocated to wilderness and those left in an undetermined state.

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Bronson J. Lewis
Executive Vice President

SEP 26 1978

September 22, 1978

Mr. Robert H. Torheim
Regional Forester
Northern Region, USFS
Federal Building
Missoula, Montana 59807

PP&S 8200
Director
Clerk
Chief
President

Dear Bob:

The prompt and responsible completion of RARE II is of great concern to the American Plywood Association and its members who produce most of the softwood plywood in the U. S. We are hopeful that the comments which follow will help you in your deliberations on the resolution of the vital RARE II study.

APPROACHES FOR DEVELOPING A DECISION

After having reviewed all the alternatives presented, we find none that we can fully support. We do, however, see merit in many of the concepts contained in the alternatives. We believe that the best approach to development of an acceptable alternative would be to:

- 1) Begin with the high-level National RPA 1975 target goals for the year 2015 for all resources, including wilderness. The rationale for using the high level is that opportunity costs should be measured against the highest production of goods and services feasible within the balanced RPA program goals.
- 2) Adjust boundaries of roadless areas as necessary to produce logical management units. Roadless areas are accidents in time and many lack management integrity. Where an area is so shaped as to defy management as a unit, it should be broken into local units. Where vastly differing resource values are involved which may logically be allocated to differing management options, i.e., wilderness versus nonwilderness, boundaries should be drawn between these differing value areas. Boundary adjustments should be required when the above conditions exist; otherwise, unnecessary conflicts in meeting RPA goals will be developed.
- 3) Determine which roadless areas most effectively contribute to each resource target. Use procedures similar to Appendix 1, Stage 2, in "Preliminary Evaluation Procedures," RARE II dated

Mr. R. H. Torheim

-2-

September 1978

July 31, 1978, except start with areas needed to maintain community stability, then highest productivity. The entire procedure should be done nationally without respect to regional boundaries. Wilderness would be ranked by landform, ecosystem and accessibility/distribution gap needs and then by Wilderness Attributes Rating System numbers.

- 4) Continue with Stage 3 in "Preliminary Evaluation Procedures," Steps 1 and 2. Prior to Step 3, check off wilderness areas to meet 80% of the high-level goal (30 - 23.8 = 6.2 x 80% = 5 million acres). Start with landform, ecosystem, and accessibility/distribution gaps having lowest resource outputs to meet this criteria, then add areas with highest WARS rating.
- 5) After 80% of RPA high-level goals are reached, use professional judgment of forest, regional and national-level personnel, along with public input, to reach as nearly as possible 100% of all RPA resource target goals. Consider further boundary changes to roadless areas in order to bring about realization of full RPA target goals. This final stage must not be purely mechanical, but must recognize physical, biological, social and political realities.

If 1975 RPA target goals were realistic, it will be possible to recommend an allocation of wilderness and nonwilderness areas that satisfy wilderness and other resource output goals. If RARE II recommendations for wilderness and nonwilderness allocation do not allow meeting RPA goals, RARE II will have failed to comply with the law. We believe it is entirely possible to exceed the goals for timber and still meet RPA goals for wilderness. We believe that the resultant wilderness system could meet not only the acreage goal, but also the goal of establishing a quality system that contains representative landforms, ecosystems, accessibility to the people of the country, and also rates highly in wilderness attributes. Care must be taken that the wilderness system does not destroy the National Forest System's ability to meet all of the other resource outputs it is capable of achieving.

DECISION CRITERIA

We feel that decision criteria should be built into the procedures for developing a recommended decision rather than simply evaluating alternatives produced by using one or more elements.

RPA Target - Program goals or targets should be more than a major consideration for evaluating an alternative; they should be the basis for developing the recommended decision.

General Public Agreement - We agree that public response should be considered as a decision criteria in the development of a final Administration recommendation. However, we have been disturbed by comments that responses will be given greater consideration if the respondent was personally acquainted with the area. This gives a tremendous bias to that small segment of the public that uses roadless areas for recreation. It would discriminate

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against the majority of Americans who might benefit from the development of roadless areas through the use of the resources involved or recreational pursuits derived from the areas if they were developed.

We are also concerned that respondents supporting a particular alternative nationally, or commenting regarding further classifications for wilderness or nonwilderness-use within their state, be considered to have responded on all roadless areas involved. If, for example, a respondent indicates support for Alternative B on roadless areas within his state, this should be considered as response opposing wilderness classifications for those areas listed as nonwilderness under that alternative, and supporting wilderness classifications for those areas to be classified as wilderness. Considering that this evaluation would be made, we would support the contention that when the preponderance of public opinion indicates preference for allocation of individual areas, considerable weight should be given to such allocation.

Based on our review of several dozen land-use studies over the past couple of years, we feel it is rather naive to believe that a general consensus will emerge for any significant number of areas. The Forest Service's failure to identify a preferred alternative has certainly contributed to a lack of consensus. We also feel that a lack of consensus should not be used as an excuse to avoid decision-making by placing areas in the limbo status of "Further Study." From the history of involvement in land-use allocations on areas containing high resource values and high wilderness values, we have found that planning delays accelerate controversy by breeding uncertainty and public disgust of planning efforts. Consensus by the interest groups involved in most cases never occurs, but controversy dies down following the decision-making process.

Community Stability and Employment - The maintenance of community stability should be more than a decision criteria used to assess various alternatives in arriving at the most desirable one. It should be the basis for development of a final decision. Throughout the history of the National Forest System, both in legislative and administrative direction, there has been a recognition of the interdependency between the management of national forest lands and the communities that have developed and prospered based on those management directions. The failure of the Forest Service to recognize the sensitivity of that bond was demonstrated by the recent timber sale bidding procedures controversy. That mistake should not be repeated in RARE II.

Allocations that would jeopardize the stability of industries and dependent communities should be the overriding factor in determining which areas should be recommended for wilderness and nonwilderness use.

National Issues - We concur with the statement made regarding national issues of energy independence, housing starts, inflation, etc., in the Draft Environmental Statement. Regarding the timber resource, one of the best means of assuring we do meet the needs for wood products is to develop recommendations based upon Resource Planning Act goals for all resources including timber. In further support of this position, we include Exhibit 1, Tables 1-4, which clearly show that the United

States has not been self-sufficient in softwood sawtimber supply even in years of low demand. When considering lumber, plywood, and log exports and imports, the United States was a net importer of nearly 6 billion board feet of softwood in 1977. This is the greatest imbalance that has occurred in our history. It will, however, very likely be exceeded this year.

The forest policy of the United States in this century has been based on self-sufficiency in meeting wood needs. It is now becoming apparent that we are failing in this. Not because of any real shortage in timber inventory or lack of productivity of our forest land base, as was predicted in the early part of this century, but rather because of indecisive policies on management of the National Forest system, which contains about one-half of the softwood inventory in this country.

The failure to meet U. S. wood needs touches the majority of the major social and economic problems of this country today...inflation, unemployment, balance of payment deficits, and increasing tax burdens.

The parallels between development of energy resources and timber resources are frighteningly similar. As further evidence of the relationship between RARE II and meeting wood needs, we attach as Exhibit 2 the APA report, "Can the United States Meet Needs for Plywood and Lumber and Establish a Quality Wilderness System?"

National Criteria of Landform, Ecosystem, Wildlife and Accessibility/Distribution - We concur with the statement that, "Preference will be given in allocating roadless areas to wilderness if the addition of the area will increase the diversity and quality of the NWPS." We agree that filling gaps in landform, ecosystem and accessibility/distribution targets are important in filling out the establishment of a quality wilderness system. We do not feel that the public perception of certain wildlife species being associated with a wilderness type environment, even when the perception may be inaccurate, is a criteria that warrants inclusion in the RARE II process decision criteria. From a biological standpoint, many of the species listed thrive better in nonwilderness situations. Many of the other species are very rarely seen by the casual wilderness traveler. It would be misleading to establish a wilderness area so that people might view an animal that is rarely, if ever, seen. We believe that if this criteria is retained it should be limited to those species which actually need a wilderness environment to thrive and whose existence is threatened or endangered.

With respect to accessibility/distribution targets, we feel that these targets would also be helpful for the West and would be significant in pointing up the need for additional wilderness classification in Southern California. We feel that landform, ecosystem and accessibility/distribution targets at the Alternative E level should receive strong consideration in making recommendations for new areas to be added to the wilderness system.

Wilderness Attribute Ratings - We are not well versed in the intricacies of the wilderness attribute rating system. However, we do believe that scenic beauty, diversity, uniqueness, solitude and other attributes which make for a memorable wilderness experience, and draw people to the use of wilderness areas, should receive high consideration in the development of a quality wilderness system.

Grasslands - It would be a break in faith, if not in law, with the stated purposes for which grasslands were established if these lands were made a part of the wilderness system. We do not feel any National Grassland Area should be considered for wilderness.

Previous Congressional Decisions - We recommend that previous congressional decisions be an added criteria to the decision-making process. RARE II comes at a point in time when many decisions have already been made relative to allocation of lands to the wilderness system. RARE II is a process to round out the completion of a quality wilderness system. Since the passage of the Wilderness Act, Congress has considered in great detail the boundaries of many areas, adding and rejecting various portions in establishing which lands would become a part of the system and which lands should be available for other multiple uses. Throughout the legislative history there are numerous examples of directions by Congress regarding the management of lands not included within the wilderness system. This legislative history should provide the basis for evaluation of roadless areas adjacent to many of the lands that have been established in wilderness. The Forest Service has ignored this legislative history by including these areas in the RARE II process. One example is the North Cascades area in Washington State adjacent to the Glacier Peak Wilderness. House and Senate reports on the passage of the additions to the Glacier Peak Wilderness clearly call for National Forest areas surrounding Glacier Peak and the North Cascades Park to be managed for nonwilderness resources.

OTHER COMMENTS ON DRAFT EIS AND RARE II PROCESS

Further Study - This classification must be minimized if RARE II is to prove worthwhile. RARE II has resulted in many delays in the normal land-use planning process. If all of the time and effort placed in RARE II is to pay off, it will have to result in allocations for the vast majority of lands. We are extremely concerned by reports that 30%, and even 50%, of the lands in RARE II may end up in further study. If that should be the case, RARE II will have failed to meet its charge of speeding the completion of a quality wilderness system. Further study classification should not be used to duck the hard decisions which must be made. It should also not be used as a means of subverting the RPA goal by placing vast areas in further study pending establishment of new RPA goals. Lands recommended for wilderness and for further study must not exceed the 25-30 million acre wilderness goal.

It is particularly important that no lands necessary to realize full RPA timber sale goals within the next five years be placed in further study. On many forests, timber sale programs will deteriorate significantly unless lands are immediately returned to nonwilderness use.

Strengthening Draft EIS - The final environmental statement should clearly show in graphic form impacts of all the alternatives, including the recommended alternative on RPA target goals for all resources. After this is done, then the social, economic and environmental costs of each of the alternative resource level outputs should be shown. For example, it is impossible to distinguish between employment impacts associated with timber harvest and those associated with water production, forage, or developed recreational areas. This is also true of revenues generated, inflation impacts, balance of payments deficits and other impacts.

We sincerely hope that APA's views on RARE II will help to assure that the U.S. both meets its needs for plywood and lumber, and establishes a quality wilderness system.

Sincerely,



BRONSON J. LEWIS
Executive Vice President

Enclosures

cc: John McGuire, Chief USFS
M. Rupert Cutler, Asst. Secretary of Agriculture
APA Board of Trustees

V-54



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Mr. John R. McGuire, Chief

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August 18, 1978

August 18, 1978

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Dear Mr. McGuire:

EDITOR

EDWIN A. NOBLE
N. DAKOTA GEOL. SURVEY
UNIVERSITY STATION
GRAND FORKS, N. DAK. 58201

On behalf of the Association of American State Geologists, representing the State Geological Surveys of all 50 states and Puerto Rico, I respectfully submit to you the following resolution, passed at the recently concluded 70th Annual Meeting of the Association at Jackson, Wyoming:

Whereas, the Association of American State Geologists believes that the wise use of America's resources is of preeminent concern and that a continuing strong national economy depends on this, and

Whereas, there is a deep national interest in public land policy, and

Whereas, it is important to insure that our nation's public lands will bring maximum benefit to all citizens of our nation,

Therefore, be it resolved that the Association of American State Geologists favors multiple use of our public lands over single use wherever possible, and,

Be it further resolved that there is an urgent need that further single-use classification of public lands be withheld until there is obtained for each subject area a total assessment of resource values based on balanced scientific studies and appropriate review of all factors, including timely demonstration that the action taken is in the highest public interest, and

Be it further resolved that provision should be made for a viable mechanism to return single use classification lands to multiple use when changing priorities or significant new developments warrant it.

We sincerely hope that you will be able to support the worthy purpose of this resolution.

Respectfully submitted,

Arthur A. Socolow,
Past President,
Association of American State Geologists

AAS-ab

STATISTICIAN

WALLACE B. HOWE
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55-A

DISCOVER
AMERICA
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ORGANIZATIONS, INC.

The National Organization of the U. S. Travel Industry
1100 Connecticut Avenue, Northwest, Washington, D.C. 20036, (202) 293-1433

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The Honorable John R. McGuire
September 29, 1978
Page Two

September 29, 1978

The Honorable John R. McGuire
Chief
U.S. Forest Service
Department of Agriculture
P.O. Box 2417
Washington, D.C. 20013



Dear Mr. McGuire:

On behalf of Discover America Travel Organizations (DATO), the national organization of the U.S. travel industry, I would like to offer comments on one aspect of the Draft Environmental Statement involving RARE II.

DATO is unique in that it represents the common interests of major travel industry components and is supported by them. Its membership includes individuals from more than 1,200 organizations, firms and agencies. Among its members are individual state and territorial government travel offices as well as the convention and visitors bureaus of America's principal cities.

Travel and tourism have become a permanent and prominent feature of the American standard of living and the quality of the tourist experience is a national concern.

National parks, forests, seashores, recreational areas, monuments, historic sites, and wilderness have become tourist destinations and, as such, present the issues of access, modes of use, suitable facilities, carrying capacity, and environmental protection. DATO is deeply concerned with these issues and with the conservation, use and management of the nation's vast public recreational lands.

Continued

We are concerned that the "decision criteria" contained in the Draft Environmental Statement has not given adequate consideration to organized snow-related recreation. Accordingly, we propose that an eighth criteria be added to the list, to-wit:

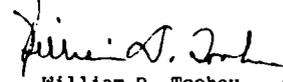
Areas with high potential for organized snow-related recreation will receive priority for allocation to nonwilderness so the resource may be fully realized.

We also urge you in your decision-making process to give greater emphasis to criteria number 1, 3 and 4 than to the other four criteria.

It is important that those now or in the future seeking outdoor recreational activity such as skiing on roadless areas of national forests not be denied the opportunity. At present, no feasible alternative sites, for the most part, exist in private or other governmental ownership. Furthermore, the economic viability of many communities is dependent upon the development and expansion of these outdoor recreational activities.

We ask that you incorporate the above concerns in your final decision. If we can be of any assistance, please let me know.

Sincerely,


William D. Toohy
President

WDT:edz

V-56

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FRIENDS OF THE EARTH

TO: John McGuire, Chief, U.S. Forest Service

FROM: Margie Ann Gibson, Wilderness Coordinator *MAG*

RE: Friends of the Earth National RARE II Comments

I. Introduction

Although RARE II may have been undertaken with the best of intentions, it has proven to be completely inadequate for land use decisions of the magnitude and importance of those involved. The program has been overly hasty, superficial, and is constructed in a way that is inherently biased against wilderness designation for deserving roadless areas. This anti-wilderness bias is apparent throughout the RARE II DES: from the range of alternatives, to the decision criteria, to the absence of any discussion of the costs and impacts of development and the benefits of wilderness.

The RARE II DES attempts far too much at once, yet does nothing thoroughly. Development of wilderness goals and the methods and constraints for evaluation and comparison of roadless areas, as well as the final selection of roadless areas for wilderness are all to be made in just a few short months. Public comment is requested only for the final selection of roadless areas for wilderness since the program has already made so many of the key decisions about process, goals, methodology, constraints, etc. The haste, brevity, and confusion of the RARE II program obscures many of these important aspects. The program ends up selecting goals and processes by the "black box" method without leaving an effective opportunity for comment upon the methods and results. A real analysis of the need for the RARE II program would have identified areas and issues in which prompt decision-making is truly necessary, and would have directed public attention to these points.

Further, the decision to complete RARE II on a very short time table and to allow no deviation from that deadline has not allowed for the program to correct errors, particularly those which are structural or procedural problems rather than simple data changes. This of course makes public reaction to the goals and procedural aspects of RARE II a completely futile effort.

If the RARE II program is to arrive at better decisions than those resulting from the Land Use Planning Process, it can do so only to the extent that it maintains a higher quality of information and analysis than those studies. This is not a likely result in view of the extreme haste and superficiality with which the program is proceeding.

The "speed before quality" nature of the program is illustrated by the following passage in the July 31, 1978 memo entitled "Preliminary Evaluation Procedures - RARE II" from the Washington office of the Forest Service:

Northwest office 4512 University Way NE Seattle, Washington 98105 (206) 633-1661

"The RARE II process is too far along to implement new and complex methods, processes, or systems unless they:

- (1) are tried and proven
- (2) are easily understood
- (3) are easily applied
- (4) save time and/or other management resources
- (5) use existing data
- (6) can be applied nationally

The assumption is made that the evaluation criteria contained in the DES will, for the most part, remain intact."

This is in essence an admission that the decisions have already been made and that the public input will have very little effect.

If RARE II was really to be a new and comprehensive look at the problem, then the inventory should have been new and comprehensive. Instead, many qualified roadless lands were not evaluated, regardless of the deficiencies and the lack of uniformity of the Land Use Planning studies. The excluded lands have in some cases never been inventoried or listed in any of the RARE programs. Further, they are not uniformly distributed throughout the National Forest System, but tend to be concentrated in a few specific areas, notably central Nevada, the Boise and Sawtooth National Forests in Idaho, the Kootenai National Forest in Montana, and the Willamette National Forest in Oregon.

The use of the 1975 RPA in RARE II is one of the most seriously defective aspects of the program. RPA has not been endorsed or funded by the Administration or Congress — indeed, its only support seems to be from the Forest Service and the timber industry. Instead of these outdated targets greatly limiting the options and influencing the final decision, RARE II should have served as independent new data for arriving at the 1980 RPA goals. As it is, many worthwhile options have not been considered because of the limitations imposed by the 1975 RPA targets.

The usefulness of the national DES and the supplements is greatly diminished by the absence of any index or cross-referencing. This lack makes it extremely difficult to find information, compare points, and investigate inter-relationships between factors. For example, many items of information are presented in one place, while their explanation is hidden in the text without any clue as to location. This makes the document appear even more confusing and disorganized than it actually is.

II. Weaknesses of the Evaluation and Decision Criteria

A. The WARS System

The WARS system, while being a good idea in theory, is far too subject to the whims and prejudices of Forest Service personnel throughout the nation and, as such, is arbitrary and inconsistent. Scoring was not uniform even within a single National Forest. An excellent example of this is two areas near Mt. Rainier National Park: Tatoosh, a 17,000 acre ridge in the Gifford Pinchot National Forest, received a WARS rating of 24. Just a few miles away, the 200,000 acre Cougar Lakes area of high ridges, numerous alpine lakes, timbered valleys, and rugged peaks received a WARS rating of only 21. Both areas were selected as Wilderness Study Areas in RARE I, and both possess considerable wilderness character. To

local conservationists, who for years have actively sought Wilderness protection for Cougar Lakes, it is totally inexplicable that WARS gave Tatoosh a 12% higher rating than Cougar Lakes. While it is understandable that it might be difficult to obtain consistent WARS ratings from different regions of the country, the assignment of different ratings to areas in the same mountain range and within only a few miles of each other casts grave doubt on the credibility of the entire system.

Another major problem with WARS is that quality and quantity of the Wilderness resource are not reasonably balanced against each other in the way that the ratings were used in formulation alternatives. For example, selection of a 51,000 acre area with a rating of 25 ahead of a 500,000 acre area with a rating of 24, all other factors being equal, is an illogical and unreasonable allocation. Further, the alternatives use arbitrary cutoff levels without any explanation or justification. For example, in Alternative D, all areas with WARS ratings in the top 40% for each National Forest Service Region were allocated to either Wilderness or to further Planning. How the 40% figure was arrived at is never stated, nor was there any analysis to indicate how areas and acres were distributed statistically. The situation is further obscured by the fact that the regional supplements do not identify what WARS rating marks the 40% level.

Finally, WARS and the criteria used in it to evaluate Wilderness are completely unexplained by the DES and the technique by which it was employed is not explained. As far as the public is concerned, the ratings might as well have been drawn by each Forest Supervisor from out of his "Smokey the Bear" hat.

B. Resource Outputs

Throughout the national DES and the regional supplements, the maximum potential "benefits" of development are assumed -- whether they could be achieved in reality or not -- and the maximum "costs" of Wilderness designation are detailed. However, the costs of development, both in terms of dollars and of environmental degradation and loss of wilderness recreation opportunities, are given no attention. Furthermore, the many positive aspects of Wilderness designation remain virtually unrecognized. This includes not only the "obvious" wildlife, fisheries, water, air, soil, scenic, and recreation values of wilderness, but also the less recognized benefits in the form of wilderness-related employment and the savings of the costs involved in building and maintaining the supporting facilities necessary for development. In many cases, "development" of roadless areas would not be economically feasible unless government assumed the sizable capital outlays for road-building, power supply, and the like. A much more practical approach in these instances would be to devote money saved through not developing roadless areas to make more efficient, less wasteful use of already developed areas. In this way, we could preserve the remaining vestiges of our wilderness heritage while making full use of the potential of those areas that have already been tapped for their resources. In short, one of the grossest failings of RARE II is that it did not include a complete and balanced cost-benefit analysis so as to give a true assessment of the merits of the many available options.

Furthermore, the potential resource values of the roadless areas are examined completely out of context. There is insufficient attempt to assess the roadless areas in light of the resources available -- either actually or potentially -- from nearby public or private lands. Thus no attention is given to the alternatives

available to development of roadless areas when, in many cases, alternatives do exist which would be preferable to development in all respects.

Another example of a completely inappropriate approach used in the RARE II process is the evaluation of roadless areas on a per area rather than a per acre basis. In this way, a 1000 acre area must contain more timber in total than a 200,000 acre area (even if the larger area's development is economically unviable) in order to be ranked of greater economic value. Obviously, this type of approach will benefit no one.

Along the same lines, data quality is rather poor throughout the national DES and the supplements. Some data are incorrect, incomplete, or outdated. Data are commonly inconsistent, particularly where derived from heterogeneous sources. Not all available data were used and countless important data were never collected. Very little attempt was made to provide any indication of sources or quality of data. In short, for a decision process of such great magnitude and far-reaching implications, data quality control was inexcusably absent.

1. Minerals

The consideration given to mineral and energy potential in RARE II is illustrative of the extremely poor assessment of resources by RARE II. Essentially all that is "evaluated" is the real or potential presence or absence in a given area of any "critical" minerals or energy sources. The only "impact" considered is whether or not the area would be used or not used for resource development. No attention whatever is given to the specific minerals which occur, the form in which they occur, the size, grade, and economic viability of the deposits, the actual area affected, the availability of alternative sources, the need for the commodity on a local and/or national basis, the time span of development, and so on and on. As in so many other instances in RARE II, no attempt is made to weigh the costs against the benefits of development.

The assessment might be of more value if the public were not expected to take the little information that is provided completely for granted. All that is provided is a total number of "proven, producing, or high potential" sites and few or no references are provided to document even this tiny crumb of information. For all the reviewer of the DES and supplements can tell, a "Proven or Producing Critical Mineral Site" might, for example, consist simply of a tiny and isolated occurrence of azurite or malachite. Although such an occurrence could well be considered a "producing" site of a mineral containing "critical" copper, such a site could hardly be considered to be of any significance itself. The critical point is that far too little information or useful evaluation is provided by RARE II to serve as a basis upon which to assign an area to "non-wilderness", and even exclusion of some areas from Wilderness designation on the basis of the information provided might be seriously questioned. Further, as with many other criteria used in developing the alternatives, no explanation or justification of the use of the criterion is given. The alternative is simply presented as a finished product with only the vaguest mention of the factors considered.

2. Timber

The timber screening suffers from all of the overall problems outlined above. As in the WARS rating, arbitrary threshold levels were established (in this case at 2, 4, and 8 MMBF and 5%) without any discussion or justification for the use of those levels in assigning roadless areas to allocation categories and the

level used was not specified in the Regional Supplements. For unspecified reasons, it was decided that timber thresholds for Eastern Regions of the Forest Service Alternatives C and D would be half the threshold level for the rest of the country. No discussion of this decision is included and it is difficult to construct any possible explanation other than a distinct bias against more wilderness in the Eastern States.

Considerable confusion results from the use of the "potential productivity" figure (measured in board feet). In some instances, this number includes non-sawtimber products, such as posts, poles, pulpwood, etc. There are a number of areas in which the potential productivity for these products greatly exceeds current demand. The use of such potentials is of dubious value.

3. Grazing

The threshold and cutoff levels used for assignment of areas to categories are justified no better for this criterion than they are for others. 300 AUMS and 750 AUMS are used as thresholds with no explanation of their derivation.

4. Recreation

As with the other criteria, recreation impacts are assessed in terms of absolute potential without regard to the costs and impacts of, or demands for, the utilization of that potential. Similar to other resources, the threshold levels used for recreation are not discussed or justified.

Finally, there is a serious problem in that all potential types of recreational use are considered as being perfectly equal. One day of backpacking is equal to one day of camping or downhill skiing. While it is difficult to assess the "exchange rate" for these different activities, the demand for them is quite different. Similarly, the role of the roadless areas in supplying that demand is very different: There are many areas in the National Forest which can fill demands for further campgrounds, but what areas other than those that are roadless can satisfy the rising demand for a wilderness experience?

C. Ecosystems

Ecosystems of varying size and sensitivity are distributed throughout the United States and are commonly defined on the basis of the combination of flora and fauna inhabiting a given area. Unfortunately even a cursory examination of the Forest Service system (Bailey/Kuchler) reveals that this evaluation criteria comes nowhere near providing a specific enough basis for meeting the goals of representing as many ecosystems as feasible within the National Wilderness Preservation System.

A critical problem with the Bailey/Kuchler system is the excessively large mapping units used and the overgeneralized vegetative types. Virtually all ecosystem areas under 50,000 acres are omitted (DES, p. 13), eliminating many ecosystem types from any consideration and not identifying many small or isolated examples of others. Further, Kuchler himself states:

"The small scale of maps requires a degree of generalization that does not show large variations of a given vegetation type...Thus, a type of

vegetation may differ markedly at its opposite borders, be these northern and southern, upper and lower, drier and moister, or of some other kind... In view of the degree of generalization on these maps, a given vegetation type may, in fact, consist of several basic plant communities and represent clines of populations." (from reverse of map in DES.)

Clearly, any classification that includes both Boston, Massachusetts and Knoxville, Tennessee in a single ecosystem, and Reno, Nevada; Pocatello, Idaho; and Ellensburg, Washington in another is far too generalized to be very useful.

The Bailey/Kuchler system identifies only potential, not actual, vegetation. Also, it deals only with flora--fauna are not considered at all. Variations due to soil or geology are not identified. The Bailey/Kuchler system might identify the bare minimum of ecosystem types on which to base representation nationally. However, representation in each state or National Forest should be based on more detailed ecosystem mapping, such as Duabenmire's work in the northern Rockies, Kuchler's work in California, etc. in combination with some kind of faunal typing.

D. Landforms

As with the "ecosystem" criterion, the "landform" system is so broad as to be meaningless. For example, the Rio Grande Valley and New York City are considered to be in the same "landform". Although the idea of landforms as a criterion is a good one, what the RARE II DES presents are not actually "landforms" at all, but physiographic provinces. The landform typing should be revised using much smaller physiographic subprovinces and identifying specific landforms and types of landscapes within each subprovince in order to insure as broad and complete representation as possible on both a national and regional level.

E. Accessibility and Distribution

This criterion contains numerous major flaws both in its conception and its presentation.

The 250 airline-mile "day's travel time" is arbitrarily adopted without any regard for the actual quality and availability of transportation. It is stated that "both the total and potential wilderness acreage within a 250 mile radius" is accounted for in categorizing counties, yet there is no explanation of what is considered to be "potential" wilderness nor is there any indication of how either total or potential wilderness actually entered into the "calculation of opportunity".

No numerical data was presented in either the national DES or the regional supplements. The only "data" presented are the map on page 94 and the tables on page 30. The map is extremely unclear and would continue to be so even if "category C counties" and "counties above median level" were not completely indistinguishable. There is no explanation of what the categories mean nor is there any clue to the fact that they are "defined" in the depths of the "Alternatives Considered" section. The tables are merely another example in an unending series of unexplained final products: There is not even any indication of what roadless areas were used to achieve the targets.

The targets proposed to remedy the problem of low wilderness accessibility are based on roadless area/population while the problem was defined by acre/population. The acre/population approach is far more logical if a real solution to the problem

of wilderness availability is to be achieved.

The counties for which there are no RARE II areas within 250 miles are completely abandoned in the consideration of accessibility. Rather than simply writing these counties off, a special effort should have been made to account for them through identification and protection of those areas that are closest and/or identified as being used by residents of the counties in question.

F. Wilderness - Associated Wildlife

Although fish and wildlife populations and distribution should be weighted heavily in recommending additions to the Wilderness system, the "wilderness associated wildlife" criterion as used by the Forest Service is so incomplete and trivial as to be virtually useless.

While consideration of wildlife that the public associates with wilderness may be of interest, it is hardly adequate as the primary criterion for assessing wildlife values. Only 29 species are considered, seven of which have, to quote the DES, "very restricted occupied habitat". In fact, two of these, musk ox and polar bear, are found nowhere near any National Forest. The list includes only eight species of birds and three species of fish and only two small mammals are considered. Reptiles, amphibians, and invertebrates are completely ignored.

Although Dall, Bighorn, and Desert Bighorn sheep are considered separately, other distinct subspecies, such as Rocky Mountain and Roosevelt elk, are not. Thus many rare and unusual forms of population remain completely unidentified and their presence on the roadless areas is not considered.

The criterion in no way measures the factors that are truly significant in insuring complete representation and continued survival of all forms of wildlife that depend on wilderness. For example, no consideration is given to habitat, range, distribution, population, communities, adaptability to changing conditions, and so on. A specific illustration of the type of critical information that the criterion ignores might be the case of whitetail deer in the Tongass National Forest. Studies in Southeast Alaska (Leopold and Barrett, 1972 and Billings and Wheeler; 1975) show that whitetail deer are dependent for their survival upon old growth stands (i.e. wilderness) as a source of snow-free forage and shelter during the winter months.

Rare, Threatened, and Endangered Species, which are protected by law, are not considered in this section at all and the DES leaves it completely unclear how these species are taken into account by the process.

G. Missing Criteria

Many factors were completely ignored in the criteria for evaluating and deciding upon the designations for the roadless areas. For example, there is no evaluation of current wilderness-type use in roadless areas. The fact that many of these areas are presently receiving substantial recreational use as wilderness should rank highly in a DES which places so much emphasis on preserving as yet unrealized potentials. Further, areas contiguous to existing National Parks and Wilderness Areas should be given special consideration as Wilderness additions.

Both the Wilderness Act and the MUSY Act place considerable emphasis on the importance of protecting watershed and soils conditions within the National Forests. Wilderness classification certainly provides an effective means of achieving that end. Identification of fragile watersheds using Forest Service data, 208 plans,

or other documents should have been used to highlight areas in which wilderness preservation could make a significant contribution to watershed, water quality, and soils protection. An evaluation of the negative effects of logging, road building, ORV use, etc., on these resources should also be considered.

In addition to the deficiencies already discussed in the section on ecosystems, there is no provision in the criteria to evaluate roadless areas on the basis of Rare, Threatened, or Endangered species of plants. Nor is there any evaluation of cultural or historic values, including old homestead sites, historic trails, and the like. These are but a few of the criteria not considered in the DES that should have been.

III. The Alternatives

The "array" of alternatives presented in RARE II does not represent a true spectrum of options and is strongly biased against wilderness and towards development through application of "non-wilderness" designation.

Of the "functional" alternatives, the largest acreage considered for wilderness is 33% of the RARE II inventory, while the smallest non-wilderness acreage is 37%. This clearly does not adequately cover the full range of potential alternatives and forces conservationists either to take a more extreme stand than they actually support (Alt. J) or to do the Forest Service's job by proposing a satisfactory alternative.

While none of the "functional" alternatives would cause outputs for any other resource to fall below the '75 RPA targets, several of the alternatives would allow wilderness to fall below the '75 wilderness target. Further, while the DES asserts that the goals and targets set out for Ecosystems, Landforms, Wilderness-Associated Wildlife, and Distribution and Important considerations, only two of the seven alternative presented meet even the "low level goals" for these criteria (only one meets the "high level goals")

The lack of environmental and economic assessment data makes the effective evaluation and formulation of alternatives impossible. Similarly, there is no way to assess the effectiveness of the alternatives in meeting perceived needs, nor, for that matter, can the reality of these perceived needs be adequately assessed.

Finally, a serious effort should have been made to devise a strategy for preserving the maximum amount of roadless areas as wilderness while continuing present levels of support to independent communities through improved management of already roaded lands.

IV. Conclusions

In addition to looking simply at the measurably and estimable costs and benefits of development and wilderness designation, the Forest Service should recognize its unique position as a steward of these roadless lands for the national good. It is not the business of the Forest Service to try to compete with private enterprise in providing those commodities that are best produced by private business on private lands. It should be the task of the Forest Service to do its utmost to assure the perpetual availability of those commodities which

Its lands produce but which the private sector has no incentive, economic or otherwise, to provide. This includes supplying clear air, sufficient watershed, a large and varied supply of habitat to assure propagation of an abundant and diverse population of plants and animals, complete representation of biological, geomorphological, and scenic diversity, and finally, lands to enable a growing human population to satisfy its increasing demand for the many forms of wilderness recreation. Thus the Forest Service should plan and implement an alternative which seeks to provide that which private enterprise does not, which minimizes environmental degradation of the National Forests, and which will assure maximum benefits for all future generations.

It seems unreasonable for permanent land use decisions with irrevocable ultimate effects to be made on the basis on the RARE II process while any decisions for permanent wilderness protection must await Congressional action. This is particularly inequitable in light of the inadequate and biased nature of the RARE II process. In any event, the RARE II results have not demonstrated the need for any further development of roadless lands.

In addition to the above comments on the RARE II process, we would like to register our support for the many "Citizens' Wilderness Alternatives ("W") across the nation (see attached).

V-61

STATEMENT

JACK M. ALLEN, PRESIDENT

FOR

INDEPENDENT PETROLEUM ASSOCIATION OF AMERICA

AND ON BEHALF OF

CALIFORNIA INDEPENDENT PRODUCERS
ASSOCIATION
KANSAS INDEPENDENT OIL AND GAS
ASSOCIATION
KENTUCKY OIL AND GAS ASSOCIATION
LIASON COMMITTEE OF COOPERATING OIL
AND GAS ASSOCIATIONS
LOUISIANA ASSOCIATION OF INDEPENDENT
PRODUCERS AND ROYALTY OWNERS
MICHIGAN OIL AND GAS ASSOCIATION
NORTH TEXAS OIL AND GAS ASSOCIATION
OKLAHOMA INDEPENDENT PETROLEUM
ASSOCIATION
PENNSYLVANIA OIL, GAS AND MINERALS
ASSOCIATION
PERMIAN BASIN PETROLEUM
ASSOCIATION

NATIONAL STRIPPER WELL
ASSOCIATION
ILLINOIS OIL AND GAS ASSOCIATION
TEXAS INDEPENDENT PRODUCERS AND
ROYALTY OWNERS ASSOCIATION
WEST CENTRAL TEXAS OIL AND GAS
ASSOCIATION
OHIO OIL AND GAS ASSOCIATION
INDEPENDENT PETROLEUM ASSOCIATION
OF MOUNTAIN STATES
PANHANDLE PRODUCERS AND ROYALTY
OWNERS ASSOCIATION
THE LAND AND ROYALTY OWNERS OF
LOUISIANA
PENNSYLVANIA GRADE CRUDE OIL
ASSOCIATION

REGARDING THE

ROADLESS AREA REVIEW AND EVALUATION, PHASE II

DRAFT ENVIRONMENTAL STATEMENT

SEPTEMBER 29, 1978

Mr. John McGuire, Chief
U. S. Forest Service
U. S. Department of Agriculture
P. O. Box 2417
Washington, D. C. 20013

RE: RARE II Draft Environmental
Statement

Dear Chief McGuire:

The Independent Petroleum Association of America appreciates the opportunity to comment on the Draft Environmental Statement (DES) on the Roadless Area Review and Evaluation, Phase II (RARE II).

IPAA is a national organization comprised of some 5,000 members whose basic interest is in the exploration, development and production of crude oil and natural gas in all producing areas of the United States. Most of our members are independent operators who own their businesses personally, though some are publicly-owned independents. We are joined in these comments by the nineteen unaffiliated state and regional oil and gas associations listed on the cover page. The combined membership of these associations includes virtually all of the 10,000 to 12,000 independent oil and gas producers in the United States. They are dependent upon the availability of land in order to find and develop domestic energy supplies. Therefore, balanced management of public lands is of vital concern.

Our comments are comprised of two sections: (1) general remarks about the RARE II program and DES (this section), and (2) site-specific recommendations (attached section). In order to provide tract-specific comments, IPAA mailed a survey to 23 state and regional associations as well as to all its members and associate members in the eleven Western states containing the majority of RARE II areas (some 2,000 organizations, companies, and individuals in Montana, North Dakota, Nebraska, Wyoming, Idaho, California, Nevada, Utah, Colorado, New Mexico, and Arizona). These tract-by-tract recommendations and comments reflect the information submitted in response to those surveys. They are supplementary to comments submitted individually by organizations, companies or individuals and are not all-inclusive. They are limited to information currently and readily available. We anticipate that

Mr. John McGuire
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changes in technology and availability of subsurface resource data over time would likely substantially alter the information contained in these survey responses.

GENERAL REMARKS

RARE II AND ENERGY

The people within the United States today enjoy a standard of living that is among the highest in the world. To maintain that standard, this highly industrialized society consumes a greater amount of energy per capita than any other country. Domestic crude oil and natural gas constitute the cheapest energy source for U.S. consumers -- less than \$6.50 per barrel present composite price (natural gas converted to barrels of crude equivalent). At the same time, imported oil costs those same consumers \$15 per barrel.

And, contrary to popular perception, the situation has worsened since the 1973 Arab petroleum embargo. During the first half of 1978, about 42% of our petroleum product consumption came from expensive, unreliable foreign sources. We produce less petroleum now than we did before the embargo while only 13 years ago the U.S. had surplus producing capacity. We have become almost three times as dependent upon embargo participants for petroleum products than we were before the embargo.

How does the domestic energy supply situation relate to the RARE II Wilderness study? The answer is obvious: both require land and, under RARE II, both uses are competing for many of the same areas. RARE II must decide which use is "the highest and best use" for each area in dispute.

Independent operators are especially concerned with the potential large-scale withdrawal of land from exploration and production activities. They have drilled about 90% of the exploratory wells and found approximately 75% of the new fields. They have discovered over half of our oil and gas reserves. The availability of land is basic to their success in locating new supplies.

Long before the Arab embargo, Congress recognized the importance of minerals development in relation to wilderness. The Wilderness Act of 1964 specifically

provides in relevant part that "Notwithstanding any other provisions of this Act. . .all also pertaining to mineral leasing shall. . .extend to those national forest lands, designated by this Act as wilderness areas." Clearly, Congress expressed its intent that, if permanent impairment of the land is avoided, oil and gas activities provided for under the Mineral Leasing Act are a high priority use deserving a special provision under the Wilderness Act.

This issue is critical when one examines the U.S. land inventory in relation to oil and gas operations. Most of the onshore lower-48 Federal lands are located in the 11 most western states. Oil and gas are produced in 8 of these states. In these 11 states, a total of 87,455,595 acres of Federally-controlled lands are under lease for oil and gas. This is more than 90% of the total leased Federal land in the U.S. Competition for land and land uses is strong in those states.

Unfortunately, it is not possible to choose where deposits of oil and gas should or might be found. Only extensive analysis and evaluation of many types of data can determine geologic conditions indicating oil and/or natural gas potential. Only drilling will answer with certainty what the potential might be. However, even with the aide of sophisticated technological advances only one in ten test wells locates commercially producible crude oil or natural gas. Thus the availability of land for exploration is the first ingredient for increasing domestic energy supplies.

Wilderness management under RARE II ignored that need on 62 million acres of national forest land. By imposing "no access" and/or "no surface occupancy" stipulations on leases and by shelving applications to conduct seismic work or to drill, operators were not allowed to find out what might lie beneath the surface. Most of this acreage is unexplored, but recent studies indicate high potential exists and some areas are among the "hottest" U.S. prospects for exploration. (We will detail this issue later in these comments.)

Congress also recognized the need for and value of knowledge about our sub-surface resources. Section 4(d)(3) of the Wilderness Act provides for the collec-

tion of information about minerals as long as wilderness potential is not permanently impaired. The legislative history also clearly shows that while wilderness potential should not be sacrificed to permanent impairment, mineral exploration activities should be permitted. And yet, ingress and egress were, as a practical matter, either not permitted at all or permits for same were shelved, pending final dispensation of RARE II. Thus, those who not only have the technical know-how but also the contractual right to explore RARE II areas for minerals information were not allowed to do so. The benefit of that information will not be part of the RARE II decision process.

Opponents of this position quickly point to the language in the Act which provides for the collection of such information in wilderness areas, pointing out that until Congress acts, the lands in question are under study and must be protected. Logic defies granting greater protection to lands of questionable wilderness value than those whose virtues are known. The Forest Service has shirked its responsibilities to serve the multiple needs of this country by so narrowly interpreting its protective authorities.

An important feature of the minerals activity provisions in the Wilderness Act is the December 31, 1984 sunset on any exploration and production activities. By the specific language of that section, it is clear that all necessary activities, including "mineral location and development and exploration, drilling, and production, and use of land for. . .facilities necessary in exploring, drilling, producing, mining, and processing operations, including where essential the use of mechanized ground or air equipment. . ." would be permitted for that twenty-year period from the date of enactment. What Congress did not foresee was the current shortfall in domestic production capacity as compared to consumption. It is more apparent -- and more important -- than ever that Congress intended to keep national forests open to energy production. Interim management under the Carter Administration has contravened that intent.

be as small an area as the diameter of the drill bit. In the case of producing fields, the average 30-year life-span is only temporary when considered in terms of today's demand for energy supplies and the future that lies ahead.

The Act provides that the Secretary of Agriculture is empowered "to protect the wilderness character of the land consistent with the use of the land for mineral location and development and exploration, drilling, and production" and for necessary facilities associated with those activities. Similarly, stipulations attached to mineral leases, permits, and licenses must be reasonable and consistent with the use of the land for which leased, permitted, or licensed.

Such has not been the case under RARE II management. Generally, no-surface-occupancy and/or no-access stipulations precluded the need for surface protection regulations. No new activity was permitted as a policy matter. The result has been to create an artificial and unnecessary chasm between productive use of the land and wilderness preservation, based upon an assumed conflict among uses which has not been demonstrated in recent history.

RARE II CRITERIA

The national forests were established and have traditionally been maintained under the multiple use concept. As Forest Service spokesmen have said, Wilderness is but one option among many land use alternatives. As Dr. Thomas C. Nelson, Deputy Chief of the Forest Service said at the IPAA Annual Meeting in October, 1977, ". . . oil, gas and mineral production, in some cases, is the highest and best use of the land." Thus, "Areas of significant current mineral activity. . . should not be included (in the RARE II inventory). . . Do not include areas with significant leases issued under the 1920 Leasing Act (Oil, Geothermal, Coal, Phosphate, etc.). . ." as Chief John McGuire instructed during the inventory. Such has not been the policy.

According to the Department of Energy's RARE II Energy Resources Assessments report, Forest Service Region 4 contains 156 high-value tracts, the highest concentration being in the Idaho-Wyoming portion of the Overthrust Belts. USGS estimates undiscovered recoverable oil and gas resources within this region to be between

1.5 and 2.0 billion barrels of oil and 7.3 and 12.0 Tcf of gas. All 1.8 million RARE II acres in that area were rated "very important" in the DOE report. The DOE report listed 588 tracts which they judge "very important" or "important" for energy development purposes. Furthermore, the RARE II DES lists 137 tracts as proven or producing sites for critical minerals and 461 additional tracts which have known high potential for one or more of these minerals. We must wonder, in light of national energy policy and Chief McGuire's instructions, how such areas could have been included in RARE II. Those areas and other's which do not qualify for wilderness management should be released immediately and returned to productive use.

The April, 1977, report of the Western Gas Sands Project Plan conducted by the U.S. Energy Research and Development Administration, announced a large resource of natural gas in Montana, Wyoming, Colorado, and Utah. The report estimates the volume of natural gas in its four study areas to be "very extensive . . . about 730 trillion cubic feet." Royalty income to the federal government could be \$45 billion over the producing life of those reservoirs. Development of this resource could be restricted to the extent that the identified basins underly several national forests and RARE II areas. These include the Routt, Manti-Lasal, Fishlake, Wasatch, and Bridger-Teton national forests, all of which are reported to contain high potential for energy resources on the attached tract-specific reports.

RARE II DES

The decision-making process which requires preparation of an environmental statement by all federal agencies before taking a major action has become infamous for detailing a wealth of information of little value to the average American at considerable cost to the project and the taxpaying public.

The RARE II DES was prepared in timely fashion - within the pre-determined schedule. However, it does not display the detailed minerals data in an effective

manner. Indicating producing, proven and high potential for minerals by a "yes" or "no" response is a poor substitute for the thorough minerals assessment report required in the Wilderness Act. Such tentative and superficial codification, as elsewhere in the DES, lends an air of finality to the display. Thus, the unsuspecting reader would believe that the DES contains all possible and necessary data, which is less than accurate. While there appears to be a wealth of surface data (sawtimber, grazing, motorized vehicles) very little subsurface data is shown.

Our criticism of this shortfall should not be interpreted as being in support of delaying final decisions on RARE II lands. To the contrary, we support timely and expeditious completion of the program. Because the nature of petroleum exploration and production is a high-risk venture into the panoply of geologic formations which lie hidden beneath the earth's surface, the era of fully assessing what's there is too far in the future to predict. Estimates of potential will change with each advance in technology, and even with each individual who interprets the data or decides to risk the capital.

The DES does not explain this lack of information, nor does it adequately assess the impact of the inevitable downstream reduction of domestic production which could result.

RARE II TRADE-OFFS

Probably the greatest disservice was done to the American public by failing to adequately inform the public about the true nature of Wilderness. Eager to sell a program, the Forest Service did not explain that Wilderness is not equivalent to a national park, but is instead an exclusive classification where only natural and primitive activities are allowed. Thus, will the choices recommended accurately reflect the public's anticipation of benefits and services mistakenly thought to accompany Wilderness? We think not.

There are many questions about Wilderness that RARE II did not ask, but should have. For example, how much wilderness do we want? How much do we need? More importantly, how much can we afford? How many will benefit? How many will lose benefits?

Answers to these basic questions would provide solid guidelines for responsible Wilderness decisions. All of the people should speak for themselves, rather than respond to the dictates of an elite minority.

RARE II ALTERNATIVES

The range of alternatives for land use offered in the DES are intended to be a fair sampling of the possible final allocations. However, without the benefit of answers to questions raised in the preceding section, IPAA cannot recommend one preferred alternative. As they relate to the petroleum industry, all but two of the alternatives create problems for future exploration and development. Alternatives A (no action) and B (all non-wilderness) offer the best choices for the most Americans under current land management policies. They would not automatically foreclose exploration and development on all or a fixed percentage of each state's public lands. Recognizing that some action will occur, alternative A is not a viable option. Thus, alternative B -- non-wilderness -- has been recommended for all tracts listed on the attached detailed comments.

As long as the location and nature of subsurface resources remain a mystery, and as long as Wilderness management precludes that knowledge, we cannot responsibly support any of the remaining alternatives.

SUMMARY AND CONCLUSIONS

Some areas are of such outstanding physical and spiritual value that they should indeed be managed as Wilderness. Like all Americans, men and women in the petroleum industry are proud of those spectacular and unique landforms which are synonymous with this nation and support the concept of setting aside certain designated areas where one might escape from the pressure of a crowded society.

But it is not reasonable nor logical to ask that all those areas be identified in one or two year's time, or even in a decade. The needs we must fulfill now and the resource values we can identify now to satisfy them will be obsolete before Congress can ratify the decision. Today's surface disturbance will dis-

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appear, providing tomorrow's Wilderness. Like exploration for evasive subsurface resources, the Wilderness review must be a continuous process of analysis and evaluation, not fixed in time.

International Snowmobile Industry Association



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(202) 331-8484
Telex: ISIA WSH 89-534

September 29, 1978

Mr. John R. McGuire, Chief
Forest Service, USDA
P. O. Box 2417
Washington, DC 20013

RE: Comments on RARE II
(USDA DES 78-04)

Dear Mr. McGuire:

The International Snowmobile Industry Association has reviewed in great detail the draft environmental statement on the RARE II program. As you know, we have monitored the RARE II program carefully over the last eighteen months, meeting on numerous occasions with Forest Service personnel in Washington, Fort Collins and elsewhere to review its progress and to provide our recommendations.

ISIA is the trade association of virtually all of the world's snowmobile manufacturers. North American sales of snowmobiles and directly related goods and services total \$1.8 billion annually (two-thirds of which is in the U. S.). For the past fifteen years, the winter outdoor recreational activity made possible by the machines our members produce has been one of the fastest growing activities in the United States. According to the 1977 nationwide telephone survey performed for the Heritage Conservation and Recreation Service of the U. S. Department of the Interior, some 14,300,000 Americans over age 12 participate in the sport currently. Snowmobiling takes place in roughly half of the coterminous U. S., in all or portions of some 35 states.

The snowmobile community - the industry and its customers - solidly support protection of natural areas and enlightened and careful management of lands, public and private. While we are a special interest, we are a very broadly based interest which seeks to achieve an effective balance among environmental protection, recreational opportunities and wise development of renewable and nonrenewable commodity outputs. The snowmobile community neither expects nor asks for access to every acre of USFS-managed land. We have consistently supported land use plans which provide high quality recreational experiences through a wide variety of endeavors

c. John R. McGuire
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even where such plans place restrictions on snowmobiling. We have been labeled "environmentally conscious" by a CEO researcher, a fact notable because of CEO's previous activities involving motorized off-road recreation.

We support the prompt resolution of philosophical controversy regarding the designation of U. S. Forest Service-managed lands as Wilderness under the terms of the 1964 National Wilderness Preservation System Act. We have often been appalled by the piecemeal, politicized process by which tracts of land are classified as Wilderness on the strength of emotions and superficial analysis. At the same time, we have difficulties with any planning process which focuses, and in effect emphasizes, any single objective of the Forest Service's mandated multiple uses.

Our first major point, then, is that we strongly believe RARE II must be treated as a fine-tuning of the RPA program, and its ultimate product must be in consonance with the 1975 RPA plan.

One of the key decision criteria cited in the draft statement is WARS - the Wilderness Attribute Rating System. We have no quarrel with the development of some form of aesthetic indicator of this type. We understand the subjectivity necessarily associated with the measurement, and the potential for rating differences associated with the decentralized data acquisition process. Yet, we have a high level of confidence in USFS field personnel, and regard the indicator as worthwhile data.

However, we are absolutely opposed to the inferences surrounding the use of WARS, namely:

- that the natural and pristine characteristics measured by WARS are sought exclusively by Wilderness users; and
- that a high WARS rating should be seen as a strong argument for designating an area as Wilderness.

Snowmobilers and a wide array of other dispersed recreational users of the national forests are frequently seeking similar, if not identical, characteristics through their recreational activities. In fact, we believe the WARS rating would in many respects mirror a Snowmobiling Attribute Rating System, or an Equestrian Attribute Rating System, or a rating system for other varieties of dispersed recreation. We do not believe that Wilderness classification is the automatic highest and best use of all lands with a high WARS rating, because we do not believe snowmobilers, equestrians, bicyclists, trail bike riders, hunters, fishermen, campers who seek some improvements (shelters, etc.) and other users of undeveloped and/or unroaded USFS lands can be relegated fairly to only "left-over" lands.

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Snowmobilers demonstrate initiative by leaving behind the easy chair and television for the challenge of outdoor activity in the winter snow. They appreciate and respect the environment, wishing to preserve its naturalness for others to enjoy.

Our second recommendation is that WARS be treated as a necessary but by no means sufficient measurement of an inventoried area's suitability for Wilderness, and that in decisions regarding high-WARS rated areas, the attractiveness and value of these same characteristics to other dispersed recreation activities which are either non-Wilderness or not exclusively Wilderness endeavors be given very careful consideration.

In reading the draft statement and working with your personnel in Washington and in the field, we have been disturbed by the failure of the RARE II program to effectively deal with the special recreational and economic challenges of winter. Despite the grandeur and uniqueness of this season, the winter ice and snow period has historically been characterized by lessened human mobility, limited social interaction, and a marked decrease in out-of-doors activities.

This poses a serious problem. Recreation is a key, necessary force in our lives. Our mental and physical well-being depends upon our ability to ease the pressures produced by today's fast-paced lifestyles. Recreation is a primary mechanism for this relief.

Yet in the winter months, many traditional active outdoor recreational activities are precluded by ice and snow and cold weather which covers much of the nation. These climatic conditions have the most impact on Americans dwelling outside this nation's urban centers, where indoor pools and concert halls and indoor tennis courts do not exist. The need for recreation does not diminish during the ice and snow period, however.

Over the past decade, the sport of snowmobiling has acted to revolutionize the once sedentary nature of winter activities. Indeed, outdoor wintertime activities have been removed from the province of the few to the realm of many, an important development in maximizing the benefits derived from recreation. Participation in the sport involves all ages and persons of all income levels. It is a sport for families, with female participation nearly equal to male participation. And it is a sport sure to grow; the HCRS 1977 survey showed that of 38 of this nation's most popular recreational activities, only five had equivalent or higher levels of interest among current non-participants. In fact, the HCRS study showed more than 10% of those who snowmobiled had done so for the first time, and that the numbers of those who wanted to snowmobile (but have never), plus infrequent snowmobilers (1-4 times per season), were even larger than the number of current, active snowmobilers. Industry sales, which

Mr. John R. McGuire
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soared 26% last year in the U. S., are apparently reflecting this strong interest.

We believe that recognition should be given to the fact that without a snowmobile, many of nature's premier aesthetic winter sights would be unavailable. Before the advent of snowmobiles, only those few of extremely strong constitution could enjoy the beauty of winter recreation. Limited numbers of people had the needed stamina and vigor to ski and snowshoe extended distances in hostile environments. This meant the young, the old, the frail, the handicapped, and in fact, most Americans had scant opportunities for outdoor winter activities.

Snowmobiling has changed this. The demands of this sport are such that virtually none need be excluded. It is the feeling of equality among all who participate in the sport that makes snowmobiling so appealing. This quality is emphasized in the article Recreation for Special People, printed in the Fall of 1977 "Outdoor Recreation Action," a U. S. Department of the Interior publication:

"Raymond Conley, who is a member of both the New Hampshire House of Representatives and the Governor's Commission on the Handicapped, attempted to conduct a survey to determine the total number of disabled snowmobilers in his state. He found that it was impossible to do so because disabled citizens are so well integrated in the sport and into local snowmobile clubs that there simply has been no reason to highlight their disabilities. Once on the machine, it all comes down to skill, physical conditioning, and a love of the winter outdoors. States Conley: 'This is mainstreaming just as we would like to have it.'"

This great variety of people, of all ages and physical abilities, who quest for healthy outdoor activity during all seasons of the year offers a real challenge to a system that historically has catered to the warm weather user. Innovative land managers like Park Ranger Bob Enns of Manitoba's Spruce Woods Provincial Park and Yellowstone National Park Superintendent John Townsley have accepted the challenge of winter recreation by offering new vistas for snowmobiling. Mr. Enns inaugurated Interpretive Trail Rides which are guided nature tours by snowmobile to learn about the geology of the area and the plants and wildlife of the winter ecology. In Yellowstone, guided nature tours and camera safaris over snowmobile routes were tested in two pilot trips late in the season by Mr. Townsley. It is clear that winter visitors to scenic areas appreciate such guided tours as much as warm weather visitors.

Mr. John R. McGuire
September 29, 1978
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The National Park Service has acknowledged the important role snowmobiling can play in winter recreation. In the Management Policies for the National Park Service by the Department of the Interior, 1978, they state:

"In the coterminous United States, snowmobiles may be permitted in units of the National Park System as a mode of transportation to provide the opportunity for visitors to see and sense the special qualities or features of the park in winter."

We thus strongly recommend that areas not be recommended for Wilderness designation solely based upon warm weather usage, especially where wintertime access is virtually impossible without a snowmobile, for such actions would preclude high quality winter recreation even when the impact on the environment is not measurable.

We further advise you that snowmobiling is very heavily reliant upon USFS lands. Throughout the snowbelt, USFS lands are concentrated in areas of dependable snow cover. The lands are aesthetically pleasing and represent the most practical land base for a winter trails network. In the west, Forest Service lands host a majority of all snowmobiling activity. Even in the midwest and eastern areas of our country, despite a far lower share of land ownership, USFS lands are heavily relied upon. In Michigan, for example, despite an immense state forest system and a broad array of state and county parks, national forests currently host some 20% of all snowmobiling activity in the state. In that state, the role of USFS lands is topped only by that of private lands. In contrast, only 8% of all off-road motorcycling in the state occurs on USFS lands. This data is taken from a May 1977 Michigan DNR report entitled "Analysis of Recreation Participation and Public Opinions on ORV's from 1976 Telephone Survey." The study credited USFS lands with 2,779,000 snowmobiling participations during the 1975-76 winter season, for a mean participation length of 3.23 hours each.

Michigan has some 17% of the entire U. S. snowmobiler population. If all snowmobilers are assumed to rely upon USFS land to a similar degree (an assumption I regard as quite conservative), the number of participations on USFS land nationwide would be some 16.8 million annually, or well over 4,500,000 visitor days annually.

This data is still more meaningful when it is remembered that all of this activity takes place during a very short period of the year. Typically the three month mid-December to mid-March period. Thus, it would be inappropriate to compare directly numbers reflecting snowmobiling use of USFS lands with hiking usage to derive an understanding of the intensity of use, since the hiking activity would occur over a far longer portion of the year.

Mr. John R. McGuire
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We urge special efforts by the USFS to provide areas for snow-based dispersed recreation and for downhill skiing, which is also especially dependent upon USFS lands. Qualifying areas should not be recommended for Wilderness, as such designation would remove irreplaceable snow activity zones.

Community stability concerns us a great deal, and we feel that large tracts of Wilderness proposals will produce a series of adverse social and economic events in rural areas where alternative industries and activities are limited. Many rural areas dependent upon commodity production from both federal and private lands may find the impact of new Wilderness areas will eliminate the economic viability of the entire local commodity industry. In such cases, it is doubtful that the financing and other arrangements can be made to attract a replacement industry. The consequence, then, will be major economic dislocation affecting the primary industry as well as dependent industries.

Snowmobiling has been a very important new and positive economic force in snowbelt areas of the U. S., literally rejuvenating the economies of snowbound communities which once faced economic hibernation during the winter months. To demonstrate its impact, we offer a few examples.

The Town of Webb, New York, a community once solely dependent upon summer tourism, found that the development of a trail system has attracted snowmobilers from 21 states and provinces. As a result, winter unemployment has declined 10% and winter commercial income during the height of the snowmobile tourist months (January/February) now equals summer income for a like period (July/August). In 1967 only six motels and restaurants were open during the winter months; now more than 50 are open, including three hotels.

Employees of Northwest Orient Airlines recently estimated that for every skier flying into Bozeman, Montana, to enjoy the fun of the popular Big Sky ski area, during the 1977-1978 winter season, three persons arrived on their planes to visit Yellowstone-Gallatin Region by snowmobile.

Reporting on a statewide study of snowmobiling, the Chief of Planning of the Wyoming Recreation Commission concluded:

"Snowmobiling not only pulls its own weight, but the potential tourism and winter-related economic impact are unbelievable in the Western United States. If just over 8,000 snowmobiles generated over six million dollars in the state of Wyoming in just one season, you can bet your boots that the people of Wyoming will be willing to invest a little of their tax money in such a going enterprise."

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Snowmobiling is also responsible for "spin-off" economic benefits. The equivalent of more than 110,000 full-time jobs for North American citizens have been created. The jobs enable citizens to further stimulate the economy through additional expenditures on goods and services and also provide significant income tax revenues to provincial, state and federal treasuries. Snowmobile-related businesses, (manufacturers, suppliers, distributors, dealers, resort and hotel facilities, etc.) contribute millions of dollars in corporate tax revenues. Approximately \$85 million in sales and gas tax revenues are received each year by provinces and states directly from expenditures on the sport of snowmobiling.

The potential for positive economic effects from snowmobiling has not gone unnoticed by the federal government. The U. S. Department of Labor has grant programs that will fund snowmobile trail building projects to create jobs and encourage snowmobiling to help stimulate a slack winter economy. Under Title IV of the Comprehensive Employment and Training Act, snowmobile trail building projects have been funded. An example reported in CETA Title IV Project Description Report for the U. S. Department of Labor, June 1977:

"The Rural Minnesota CEP Otter Tail Trails Association project provides for the development of a system of safe and scenic snowmobile trails to enhance the recreational opportunities in the community and to promote winter tourism. The project also lays the groundwork for the creation of cross country ski trails.

"This type of project will be of greatest benefit to northern communities with summer resort areas, but it will also be worthwhile in other communities. Communities with resort facilities --restaurants, motels, clubs--will gain both recreational and economic benefits. The greatest benefit to other communities will be safer, more enjoyable recreational outlets for their residents....In many communities such projects would also contribute to environmental protection and reduce community disputes over trespassing violations."

The same results can be found again and again in towns proximate to national forests: Cadillac, Michigan; Rhinelander, Wisconsin; Warren, Pennsylvania; and countless western communities.

We believe the economies of most rural areas to be largely incapable of overcoming significant economic dislocation in primary industries, and thus urge community stability to be heavily weighed in the RARE II selection process.

Mr. John R. McGuire
September 29, 1978
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Other decision criteria proposed in the statement which concern us include landform diversity, ecosystem diversity and wildlife habitat protection. We are not convinced that Wilderness designation is either necessary or desirable to achieve these goals, although we could support these goals in principle as non-Wilderness management precepts.

We feel that because Wilderness is not the only mechanism to achieve goals of landform, ecosystem and habitat preservation, it would be wrong to select anything but the low level of representation.

We further believe that it is wrong for the Forest Service to feel it shares an equal burden with other land managing agencies in providing Wilderness areas. Unlike the lands managed by such agencies as the National Park Service and the Fish and Wildlife Service, USFS lands have been assigned a broad multiple use role.

We believe USFS lands should receive enlightened and scientific management, and lands managed under prescriptive and inflexible guidelines should be minimized.

We are concerned by figures shown in the draft statement regarding dispersed motorized use. Based upon HCRS and industry data, we would conservatively estimate the previously cited Michigan study between 4,500,000 and 7,500,000 visitor days of snowmobiling take place on national forest lands. Since roadless areas constitute one-third of all USFS land, and since substantial Forest Service lands other than roadless areas are closed to snowmobiling, we would be forced to conclude that snowmobiling activity alone may well exceed the total 1,832,400 visitor days reported in the statement. A significant underestimate in this figure, as we allege, would substantially revise the potential social and economic impacts of substantial new Wilderness designations.

We feel the dispersed motorized recreational use of inventoried roadless areas is significantly underestimated. We believe snowmobile use alone in the western states probably approximates the estimated total for all motorized use.

We strongly believe that Wilderness designation is not an effective (and certainly is not an essential) management device for recreation, including primitive recreation. We believe that the management handicaps integrally linked to Wilderness - limiting dispersion, improvement of accessibility and moderation of human impact - are severe and are a principal reason why current Wilderness areas face localized and seasonal overuse problems.

Lands not officially designated as Wilderness can be managed identically to designated areas, either temporarily or permanently. Once designated as Wilderness, however, a number of uses are

Mr. J. R. McGuire
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preempted permanently and USFS management activities are constrained. This is at variance from the suggestions of certain preservationist spokesmen who suggest that official designation is the only possible means to avoid irreversible commitments of resource. The facts suggest just the opposite may hold in many instances.

We believe snowmobiling offers an opportunity for significant additional environmental protection if used as a means to consciously alter traditional recreational patterns by encouraging a shift from peak-season recreational use to the remainder of the calendar year. In this way, additional recreational benefits at reduced impact are achievable. Single season orientation compounds management costs and difficulties, yet Wilderness in snowbelt forests virtually assures single season management because the areas go essentially unused during ice and snow periods.

One basic flaw in the RARE II assessment is its primary focus on the availability of suitable lands for Wilderness recreation without measuring the availability of lands for other recreations. Recommendations based upon such an unfair assessment are inequitable, since Wilderness recreational use is a small portion of the American recreational appetite. In fact, in the name of energy savings, we would suggest that low density Wilderness recreation be provided primarily in more distant tracts of USFS lands so that travel to recreation sites can be reduced for the largest number of Americans.

We further suggest that lands in the USFS eastern region and other heavily populated areas should be recommended for Wilderness especially sparingly, since such designations will severely burden the remaining USFS lands and prevent period equitable reallocations among non-consumptive recreational uses.

The pressure for competing uses of our resources continues to grow stronger. Management plans regarding land use should be sophisticated enough to minimize irreversible resource commitments and yet maximize fulfillment of human needs in all sectors. Public land use policy should take into account changing needs and priorities for the land bearing in mind that our priorities and national needs ten years from now may be vastly different from the present.

This is precisely the strength of the RPA process. Large-scale Wilderness designations of USFS lands subverts the RPA process, by reducing the flexibility of such lands to meet multiple and shifting needs. For this reason, we look with favor upon innovative and flexible management practices such as rotating wilderness (as discussed in the Conservation Foundation's The Lands Nobody Wanted) and temporal zoning which would alternate among potentially conflicting uses by day, month or season.



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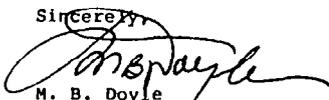
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Mr. John R. McGuire
September 29, 1978
Page Ten

The history of RARE II has displayed the pervasiveness of the superficial notion that the question of Wilderness involves commodity production versus resource protection. In fact, the largest body of Americans using the forests are at neither extreme. Equestrians, campers, snowmobilers and the myriad of others who enjoy the natural beauty of the forests support natural resource protection and skilled management. This "centrist" coalition is the wrongful victim of the superficial image rampant among media and many politicians that the only parties at interest over Wilderness are those who look upon potential profits and those who wish to halt such interests.

We are enclosing our document "Man's Role in Nature: A Case for Rational Land Management." This document seeks to underscore the myth that Wilderness is the most viable means to protect our nation's undeveloped areas and to serve Americans today and tomorrow.

In conclusion, and because more than 17 million acres of public lands have already been designated as Wilderness by the Congress, we endorse Alternative E. This would provide the desired "rounding out" of the National Wilderness Preservation System to the full extent logical under existing USFS legislation.

Sincerely,

M. B. Doyle
President, and Chief
Executive Officer

MBD:pms

Enclosures

cc: RARE II Coordinator
Regional Forester, Region 9

V-72



September 28, 1978

Recreation Management
RARE II
Forest Service
Department of Agriculture
P. O. Box 2417
Washington, D. C. 20013

Re: Roadless Area Review and Evaluation (RARE II) -
RARE II Update

Gentlemen:

In response to the Notice, subject as above, which appeared in the Federal Register of September 13, 1978, the Interstate Natural Gas Association of America (INGAA) forwards the following comments.

INGAA is a national non-profit association representing virtually all of the major interstate pipeline companies operating in this country. Approximately 90 percent of all natural gas transported and sold annually in interstate commerce flows through facilities owned and operated by INGAA's member companies. Natural gas, most of which is produced domestically, accounts for twenty-seven percent (27%) of the total U. S. energy consumption.

We wish to remind the Forest Service that the key pieces of legislation which gave rise to the wilderness preservation theme were written in the early 1960's when the scenario of the times was one of inexpensive, abundant energy sources. Unfortunately, such is not the case today nor will it be in the future; in fact, the demand for natural gas has been so great the Nation's supply has been unable to satisfy it. Since the early 1970's gas pipeline companies have been forced to curtail service due to shortages, and the natural gas crisis in the winter of 1976-1977 vividly demonstrated the value and the dependability of our Nation upon this fuel.

The dedication of lands for wilderness preservation is a commendable objective and will benefit this and future generations of Americans aesthetically. As a corollary the selection of lands containing energy sources for such preservation will be to the detriment of this and future generations by depriving them of access to this greatly needed national resource.

Forest Service
Page Two
September 28, 1978

The Nation's national forests are not only our "last frontier" for wilderness preservation, they also constitute our "last (onshore) frontier" for satisfying this country's future energy needs of both oil and gas.

While potential energy sources may underlie land within the National Forest System, their precise location, quantity and quality are for the most part yet to be determined. There is only one way to determine the extent of energy resources in our public lands--that is to explore and drill. This means physical presence is required for seismic activity and drilling equipment must be brought on site. The development of energy resources has a minimal residual affect upon the environment since the pipelines are buried and the land reclaimed. The denial of access to these resources would be detrimental to our Nation, and the RARE II decisions must be consistent with national policy goals. This means assuring continued energy exploration and development.

INGAA is concerned, and believes, because of the time constraints, the Forest Service may be acting too hastily. The Service states in the September 13th Notice it is still developing data and information which is part of its DES. The Notice further instructs interested persons that the Update Data is now available and due to its tight schedule, comments are still due October 1, 1978. INGAA submits the limited time available on such an important matter is extremely detrimental to the decision-making process.

We also feel the DES is defective in that the Economic Impact Statement, an important part of the RARE II program, has not been made available for public comment during the review period. We recognize the Forest Service has derived a Development Opportunity Rating System (DORS) which reportedly will give costs based on estimates of total present net values of nonwilderness resources which could be lost through the wilderness classification. This information is of critical concern in determining the relative importance of various RARE II sites for energy development. As of September 20, 1978, the DORS results have not been published or made available for public scrutiny. although mid-September was established as the availability date (re FR 41010).

As a consequence, INGAA recommends the Service not undertake the proposed action of designating wilderness lands under RARE II. We strongly feel the public has not had the proper opportunity to review, prepare and submit comments; therefore, the action is not in keeping with the established regulatory process. Furthermore, we recommend that any land indicating a hydrocarbon potential not be designated a wilderness area. To deny our energy short country access to these natural resources is not in the National interest.

Forest Service
Page Three
September 28, 1978

We appreciate the opportunity to comment on this proposal.

Sincerely,



Lawrence J. Ogden
Director, Construction & Operations

LJO/jed



MOTORCYCLE INDUSTRY COUNCIL, INC.

Government Relations Office

September 22, 1978

Mr. John R. Maguire
Chief
Forest Service
P.O. Box 2417
Washington, DC 20250

Dear Chief Maguire:

The Motorcycle Industry Council, as the non-profit national trade association representing manufacturers and distributors of motorcycles and motorcycle parts and accessories, is pleased to submit its comments on the RARE II Draft Environmental Statement. The Council has carefully considered the DEIS and we hope that our views are of assistance to the Forest Service in achieving an efficient and equitable resolution of the wilderness issue.

The Council's comments focus on five principle areas. These are:

- the scant data contained in the DEIS concerning dispersed motorized recreation;
- the "explicit public price" attributed to wilderness recreation visitor days;
- the consideration of recreation in developing an ultimate course of action;
- the public's inclination to use wilderness areas; and
- the importance of the 1975 Renewable Resources Planning Act program target in formulating a final RARE II recommendation.

Mr. John R. Maguire
September 22, 1978
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First, we feel that the data in the DEIS concerning dispersed motorized recreation is lacking. While the programmatic document adequately describes the immediate and long-term impacts which will be caused nationally due to implementation of the various alternatives, many of the regional supplements do not include this same level of information. The supplements do include figures which display the short-term and long-term effects (as well as the resource opportunity changes) of wilderness and non-wilderness classifications for individual roadless areas. However, the information presented is not sufficient to discern the impact of each of the ten alternatives on specific roadless areas or to determine the Forest-wide or State-wide impact of a given alternative on overall dispersed motorized use. We feel that the exclusion of this information is a serious defect in the Environmental Statement.

Second, the Council takes issue with the dollar value which is attributed to wilderness-related recreation. According to the 1977 Forest Service Annual Report, it is possible to calculate the benefits of recreational use of Forest Service lands by applying an "explicit public price" to various types of usage. For instance, dispersed recreation use (including use by off-road vehicles) is valued at \$5.00 per recreation visitor day. Wilderness use, however, is valued at \$11.40 per recreation visitor day. The Council objects strenuously to this differential which places 128% greater value upon wilderness-related recreation than upon off-road vehicle recreation. These figures become an even greater cause for concern when they enter into wilderness calculations, recommendations, and decisions.

Third, we do not believe that recreation has been afforded sufficient significance in the delineation of the stated wilderness alternatives. Only alternatives "C" and "D" permit consideration of current recreation use in classifying roadless areas. Alternative "C" classifies a roadless area as non-wilderness if the change in total recreation visitor days is greater than 10,000 between wilderness and non-wilderness management. Alternative "D" places roadless areas in the further planning category if the change in total recreation visitor days is greater than 15,000 between wilderness and non-wilderness management. Alternative "I", however, which purportedly gives secondary consideration to areas with very high resource outputs, does not even identify the change in recreation use between wilderness and non-wilderness management as being of importance. The Council believes it to be essential that recreation usage

Mr. John R. Maguire
September 22, 1978
Page Three

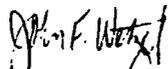
figures --in general-- and dispersed motorized usage figures --
in particular-- be incorporated into the final RARE II decision
criteria.

Fourth, we feel that the public's inclination to recreate in
wilderness areas deserves full and complete evaluation. Results
of the 1977 National Recreation Survey conducted by the Heritage
Conservation and Recreation Service disclose that as many as
72 million Americans (over 33% of the population) engage in off-
road vehicle activity annually. The designation of a large num-
ber of wilderness areas, in which the use of motorized vehicles
is prohibited, would completely ignore the needs of this very
sizeable group of recreationists.

Lastly, the Council would like to express its strong preference
for the 1975 Renewable Resources Planning Act (RPA) program
target as an overall wilderness decision parameter. The RPA
goal for the National Forest System for the year 2015 is 25-30
million acres of wilderness. Approximately 14 million acres of
Forest Service land have already been designated as wilderness
and several million additional acres are contained in current
Congressional proposals. We believe that the Forest Service
should restrict its RARE II recommendations to only the number
of acres needed to achieve the remainder of its RPA goal.

The Council is appreciative of this opportunity to offer its
comments. Please contact us if we can be of further assistance
in the final resolution of the RARE II process.

Sincerely,


John F. Wetzel
Legislative Analyst

JFW/wgv



NATIONAL ASSOCIATION OF HOME BUILDERS
FIFTEENTH AND M STREETS, NORTHWEST
WASHINGTON, D. C. 20005

ERNEST A. BECKER, SR.
1978 President

September 29, 1978

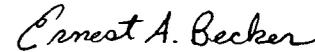
Mr. John R. McGuire
Chief
U.S. Forest Service
P.O. Box 2417
Washington, D.C. 20013

Dear Chief McGuire,

On behalf of the 105,000 members of the National Association
of Home Builders, I would like to offer these comments on the
RARE II Draft Environmental Impact Statement.

Although NAHB takes issue with parts of the Draft Environ-
mental Impact Statement, we believe the addition of the material
and information we suggest will correct the deficiencies. We
applaud the Forest Service's efforts to complete the RARE II
process on schedule, and urge that no further delays be permitted.

Sincerely,


Ernest A. Becker
President

FOREST SERVICE
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Of particular concern to the Association is that the costs of classifying land for wilderness designation to the housing industry and to housing consumers is not considered in the DES. Estimates of the impact of an expanded wilderness system reviewed by the Association suggested that these costs are unacceptably high. Moreover, as indicated above, no estimates are provided of the offsetting benefits, if any, that would occur as a result of lands being allocated to wilderness.

Finally, the Association believes that the DES was not prepared with the care and attention required for a document of such major importance. Repeated Forest Service announcements about when the RARE II study will be completed apparently forced the agency to have as its principal objective the meeting of an administratively established completion date, rather than the preparation of a detailed comprehensive analysis that Forest Service analysts have shown themselves capable of producing. The Administration has promised that additional work, including a detailed benefit cost analysis, will be accomplished before preparation of the final Environmental Impact Statement. However, no indication has been given that the public will have an opportunity to comment on this needed additional work.

RECOMMENDED SELECTION CRITERIA

In light of the concerns summarized above, the National Association of Home Builders recommends that the criteria enumerated below be used for the selection of RARE II areas for potential inclusion into the National Wilderness Preservation System. Guidelines for the use of these criteria are also provided.

In general, the NAHB recommends that the RARE II areas be considered for wilderness only where the benefits associated with additional wilderness exceeds the cost of opportunity foregone. The benefits associated with the additional land allocated to wilderness should be contrasted with the cost of opportunities foregone by reserving the land for wilderness use. Only when total discounted benefits exceed total discounted costs should a RARE II area be recommended for wilderness classification.

The specific criteria which should be used to allocate roadless areas into the categories of "wilderness", "nonwilderness", and "deferred for further planning" are:

1. The goals for wilderness as specified in the congressionally approved Forest Service Resources Planning Act Management Program should be met in a manner that minimized adverse social and economic effects. The Resources Planning Act (RPA) process considers all forest resource outputs and their interrelationships. The use of RPA goals for RARE II area allocation will insure that a "program of balanced management" (Rupert Cutler, 1978) is achieved on Forest Service lands.

Social and economic effects on the allocation system must be measured. We suggest that the Office of Management and Budget's "Social Indicators" 1973 be used as a guide for measurement of relevant costs and benefits. The social indicator used by OMB include measures of Health, Public Safety, Education, Employment, Income, Housing, Leisure and Recreation, and Population. These effects should be assessed on a national, regional, and local level.

INTRODUCTION

OBJECTIVE

This report is the response of the National Association of Home Builders (NAHB) to the U.S. Forest Service's RARE II Draft Environmental Statement (DES).

The DES was released on June 15, 1978, by the Forest Service for public review and comment. It consists of 21 documents, comprised of a national document, and 20 regional and state supplements. The national document, the one of concern in this response, emphasizes study methods and procedures. It discusses the alternative criteria used to determine the wilderness potential of individual wilderness areas, and suggests ten alternative ways of using the criteria to decide if individual RARE II areas should be classified as "wilderness", "nonwilderness", or "deferred" for further study.

RARE II, the second roadless area review and evaluation by the Forest Service, is a nationwide evaluation of opportunities for "wilderness" classification of roadless and undeveloped areas in the 187 million acre National Forest System. Under RARE II, 2,686 parcels of roadless lands totalling 66 million acres are evaluated for potential inclusion into the National Wilderness Preservation System established by the Wilderness Act of 1964. This acreage includes 26.5 million acres of commercial timberland. The first RARE, in 1972, had similar objectives, but failed when it became bogged down in the Forest Service land management process.

In RARE II, roadless areas that appeared to have high wilderness value will be recommended to Congress for official designation as wilderness. Those areas identified as having little wilderness value will be immediately released

from further wilderness consideration and returned to multiple-use management. Areas that are classified as having neither very high nor low wilderness value will be placed in a "deferred" decision category for further study. Dr. Rupert Cutler, Assistant Secretary of Agriculture for Conservation, Research and Education, states that RARE II should be consistent with USDA and Carter Administration dedication to obtaining "... a program of balanced management to meet the nation's requirement for tangible goods and services as well as the amenities of wilderness" (1978).

Response to the DES was solicited by the Forest Service from the public and from specialized organizations like the National Association of Home Builders to assist the agency to develop a "preferred" method for the classification of RARE II areas into wilderness, nonwilderness, and deferred groups. The "wilderness" group of RARE II areas will be recommended to Congress for inclusion into the Wilderness Preservation System.

This response to the RARE II DES reflects the principal interests of the National Association of Home Builders in the wilderness allocation question. Of major concern is the impact upon the nation's housing industry and consumers of an expansion of the National Wilderness Preservation System. This concern is based on our belief that the nation has entered a period where wise use of our resources is absolutely critical. We consider wilderness designation to be a non-use of any resources contained in the designated area. Also of concern is the instability in the price and supply of wood products that will occur if significant numbers of RARE II areas are placed in the "deferred" category for further study. We are concerned that local communities dependent upon Forest Service timber as a manufacturing raw material are not unnecessarily impacted by RARE II area allocations to wilderness.

In general, NAHB favors limited designation of wilderness lands in the belief that the best interests of the public would not be served by expansive wilderness designations. The public's desire for amenities in recreation areas, as evidenced by a 1977 Opinion Research Corporation poll, runs directly counter to the restrictive nature of wilderness. In that poll a majority favored developed recreation sites near to their homes over remote and pristine wilderness areas.

The Association is also aware that the economic health of our members throughout the country is linked to the well being of potential homebuyers. We are concerned that home buyers not be adversely or unfairly affected by the decisions made during the RARE II process.

FORMAT

The Association's recommendations for criteria useful for identification of a "preferred" RARE II area allocation method were provided in the introductory Summary section of this response. The Association's major concerns with the DES were also enumerated in the summary. Supportive and supplemental material are provided in the remaining sections of the response. A major section is devoted to the Association's concerns over the sufficiency and adequacy of the DES. This is followed by an expression of the Association's concerns about the impact of RARE II on the home building industry.

SUFFICIENCY AND ADEQUACY OF THE DES

The National Association of Home Builders recognized the RARE II analysis as a sincere effort by the Forest Service to measure the impact of alternative uses of a major portion of the National Forest System. It also recognizes that this analysis has been conducted in a political and institutional

environment which both constrains the nature of the analysis possible and the nature of the conclusions that can be drawn from the analysis. We have tempered our response by recognition of the following aspects of the political setting in which the DES was prepared:

1. The RARE II project is an agency initiative which, therefore, must be subordinated to Congressional directions for Forest Service management and planning. The principal sources of legislative direction to the Forest Service in the area of comprehensive planning include the 1974 Forest and Range Land Renewable Planning Act (RPA) and the 1976 National Forest Management Act. The RPA commits the Forest Service to a concept of long range planning that considers all outputs from the forest resource and their inter-relationships.

The RPA reaffirms a long standing legislative concern for community stability. This concern was first expressed by Congress in the Sustained Yield Forest Management Act of 1944. One of the purposes of the Act was "to promote the stability of the forest industries, of employment, of communities, and of taxable forest wealth, through continuous supplies of timber" (SYFMA, Section 1). More recently, the 1975 Renewable Resources Program, prepared by the Forest Service under RPA mandate, identified human and community development as one of the six resource systems to be considered in planning. The goal of this system is the helping of people to help themselves.

2. The principal problem addressed in RARE II (public land use) will generate controversies between those groups which benefit by or which are adversely impacted by increased wilderness preservation.

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3. The assignment of roadless areas to wilderness classification and subsequent inclusion into the National Wilderness Preservation System will be done on a political rather than a scientific basis. A multitude of value questions incapable of objective scientific analysis will have to be addressed by the political body. These value questions should be clearly indicated and not disguised as questions of fact phrased in scientific jargon.

4. Allocation of RARE II study areas to wilderness will constitute a type of single or restrictive-use zoning which may have serious consequences on commodity markets served by Forest Service lands. Political considerations will make any decision to add RARE II areas to the Wilderness Preservation System virtually irreversible.

NEPA REQUIREMENTS

Through the National Environmental Policy Act (Section 102, (2) c), Congress requires that all agencies of the Federal Government shall:

- "... include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on
- (i) the environmental impact of the proposed action.
 - (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented.
 - (iii) alternatives to the proposed action.
 - (iv) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and
 - (v) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented."

Recognizing that the law itself could not be comprehensive enough to establish specific procedures for the preparation of EIS's, Congress established the Council on Environmental Quality (CEQ) which was charged with developing guidelines for EIS preparation. These guidelines (38 Fed. Reg. 20549, 1973) require a "rigorous exploration and subjective evaluation of all reasonable alternatives to proposed Federal actions and their environmental impacts". In addition, "the analysis should be sufficiently detailed to reveal the agency's comparative evaluation of the environmental benefits, costs, and risks of the proposed action and each reasonable alternative". Finally, the analysis "should accompany the proposed action through the agency review process in order to prematurely foreclose options which might enhance environmental quality or have less detrimental effects".

There is also precedence for requiring that analysis of social and economic impacts be part of this procedure (Council on Environmental Quality, 1976).

The specifications of NEPA and CEQ guidelines thus dictate procedures for preparing an environmental impact statement. Although CEQ guidelines do not carry the weight of law, the courts have held that they should be favored in the interpretation of NEPA

In light of these requirements, the National Association of Home Builders believes that the Forest Service's DES for RARE II is inadequate in the areas specified below.

Costs, Benefits and Incidence Largely Ignored

CEQ guidelines and the political setting in which the RARE II allocation decisions must be made, require that the DES should make an effort to

identify those groups of citizens whose interests will be harmed or favored by alternative RARE II allocation methods. It does not. For example, the DES does not adequately identify the impact that withdrawal of timber producing lands for wilderness or for further study of wilderness potentials will have on the price of lumber and wood products used in housing. Similarly, it does not identify those groups likely to be impacted by increased timber products prices that would result from significant withdrawals of commercial forest lands from timber harvest. This is information which "should accompany the proposed action through the agency review process...".

An input-output model was used in the DES to estimate employment (but not price) impacts. However, even this analysis is of questionable value since it is based entirely upon secondary data. The DES provides no indication of the reliability of projected employment impacts. Experience in regional science studies indicates that the accuracy of predictions of primary sectors is especially low when using input-output analysis employing secondary data.

Impacts on the National Environment: Local vs. National

Although the DES does examine possible impacts on the natural environment as a result of the allocation process, it does so primarily in terms of the roadless areas themselves. The DES does not attempt to determine possible adverse effects of decreases in timber supply upon the natural environment of the nation as a whole. A decreased timber supply would result in rising prices of wood products and thus in some substitution of alternative materials for wood. Substantial increases in emission of air and water pollutants are likely to occur due to this substitution.

In addition, the amount of energy required to produce wood substitutes is higher than that required to produce the equivalent in wood products. For example, it is estimated that 2 billion board feet of softwood timber products requires 16 million B.T.U. of energy from harvest to delivery. In contrast, the energy required to produce concrete and steel substitutes for wood in home construction is eight times this amount. Increase in energy consumption carries with it increases in air and water pollution associated with increased power generation.¹

In light of these factors, the President's Advisory Panel on Timber and the Environment (1973) determined that "... the long-term needs of the people and the Nation will be better served by increased production and improved use of timber rather than be increased reliance on nonrenewable minerals".

Irreversible Effects

The DES does not indicate the irreversible nature of the loss of timber products and the economic base they provide for provision of more goods and service flows to posterity. Nor does it indicate the impact of further reductions in the land base available for future timber production. Housing needs for the next several decades will be met by trees that are in the process of maturation now. The resources available to meet those future needs are directly diminished by present designation of wilderness areas. These losses are irreversible and must be taken into account.

¹

Lumber and wood products possess the highly desirable characteristics of recyclability, biodegradability, and the lower levels of air and water pollutants caused by their manufacture. See Benefits of Increased Timber Supplies by McKillop and Manthy in the appendix.

Evaluation Criteria

The DES proposes seven decision criteria for use in the development of a preferred allocation alternative. The criteria have three origins: (1) law; (2) executive orders and regulations; and (3) obligations and policies established through previous planning efforts and decision statements. These factors provide guidance as to what the criteria should consider, but no indication is given regarding the measurements to be used or the value weights to be assigned in using the criteria. Clarification is needed as to what measures will be used to assess the cost and benefits resulting from the allocation process and to identify who will benefit and who will lose. The DES is also vague as to how criteria weights will be applied. Determination of the desirability of use of these criteria is thus impossible. (The introductory "Summary" section of this response presented criteria for the allocation process which indicate impact measurements of greatest importance and their relative value in formulating the preferred alternative).

Benefit-Cost Analysis Needed

Section V of the DES, "Effects of Implementation," is not "sufficiently detailed to reveal the agency's comparative evaluation of the environmental costs and risks of the proposed...alternative(s)" as required by CEQ guidelines.² Local, regional, and national level comparisons should be made contrasting the cost of opportunities foregone against the benefits received by reserving land for wilderness use.

²

38 Fed. Reg. 20549 (1973).

Evaluations of Benefits

The assessment of benefits arising from the allocation of roadless areas to wilderness is severely lacking, both in identification of benefits and in their measurement.

Wilderness benefits are generally considered to result from three values--existence value, option value, and use value. Use values may include recreation, scientific research and protection of threatened and endangered species. Option value is the value of preserving wilderness for use in the future. Existence value is the value of knowledge that wilderness areas exist even though there is no intention to use them. Each of these benefit aspects should be assessed by the environmental statement.

The DES does not identify who will enjoy the benefits of wilderness from RARE II lands recommended for inclusion in the Wilderness Preservation System. The geographic distribution, and socioeconomic characteristics (income, age) of those who benefit should be specified.

An implicit assumption in the DES is that there will be a future shortage of wilderness. However, no supporting evidence is given and there is no indication that such a shortage can be alleviated by allocation of RARE II areas to wilderness. The only rationale given for increasing the size of the Wilderness System is a possible increase in wilderness recreation capacity (DES, page 37). The implicit assumption is that the Nation needs all the wilderness it can get. Thus, unless evidence can be found that shortages will appear, we see little justification for increasing the size of the Wilderness Preservation System. Even if there is evidence of future shortages, thus necessitating additional wilderness designation, there is no obligation

for these needs to be met from the National Forests. Since 1964 over 16 million acres have been legislatively designated as wilderness. Nearly 15 million of those acres have come from the National Forests. In contrast of the 322 million acres of roadless areas managed by the Bureau of Land Management only 12,000 have been designated as wilderness.

Evaluation of Costs

One of the costs of allocating RARE II areas to wilderness is the value of harvestable timber withdrawn from the market as the result of the allocation. A portion of this cost can be offset by increasing harvest levels on lands not allocated to wilderness. However, according to the DES, a "benefit-cost study or investment analysis to determine if it is economically feasible to harvest the resource has not been made" (page 51). Without such an analysis it is not possible to estimate the decrease in timber allowable cuts associated with each allocation alternative. The Forest Service has recently stated that they have recognized the need for a benefit cost analysis and that it is currently being carried out. It would seem reasonable the agency should solicit public response to this analysis.

The Forest Service has not determined timber products price effects associated with the implementation of the various allocation alternatives. The only reference to price is made in the discussion of Alternative J where it is recognized that "... withdrawal could have an effect on lumber and plywood prices and probably the total cost of a new home. But of more significance to housing starts is the potential for the interrupted flow of lumber and plywood to the construction industry". The report goes on to say "This could reduce the number of housing starts and cause a lag in completion

of houses under construction". This last sentence implies very significant price increases. The DES is vague regarding possible impacts of the other alternatives, noting only that the impact will vary from place to place. This determination is especially critical given the outlook contained in the Forest Service report entitled "The Demand and Price Situation for Forest Products 1976-77":

"The longer term outlook is one of continued growth in the demand for most timber products. Timber supplies are not likely to rise significantly unless forest management, utilization and research are expanded.

"The longrun outlook is thus one of increasing competition for the available timber and higher prices for stumpage and timber products."

Another cost to the Nation of allocating RARE II areas to wilderness is a reduction in the availability of mineral resources that are associated with these lands. The DES recognizes that the withdrawal of some parcels may limit the availability of already critically short energy fuels and other minerals. But no effort was made to document these costs.

IMPACT OF THE ALTERNATIVE ALLOCATIONS ON THE HOME BUILDING INDUSTRY

Prices of softwood lumber and plywood, products used extensively in new home construction, have increased by 50% over the last two years. These price increases add significantly to the spiraling cost of new housing. There are two aspects to these high and rising lumber prices. One is a cyclical problem of great short-run instability and the second is a general trend of lumber price increases which has outpaced the general rate of price inflation for the rest of the economy since the late 1960's.

Since 1969, softwood lumber prices have increased at an annual rate of 10.4 percent compared to an average increase of 6 percent for the private non-farm sector as a whole. This general rise can be explained by a sharp rise in lumber demand during the 1970's together with sluggish expansion of supply. An examination of demographic trends, together with expectations of a decline in the inventory of timber on private lands, point to a continuing threat of higher lumber prices into the mid 1980's. Inventories of uncut timber on private lands have been reduced and Forest Service Projections indicate that supply from this source will decline unless prices continue to rise at rates above the general inflation rate. Thus if price rises are to be slowed there is a need to accelerate efforts to economize on demand, to improve the utilization of existing timber supplies and to increase the harvest on federal lands. The President's Council on Wage and Price Stability (1977) emphasizes that efforts to improve utilization of timber supplies will not have significant impact on the lumber market in the next few years. The report stated that "It is inevitable that efforts to achieve a near-term increase in timber supplies will focus upon existing inventories on federal timber lands." ... "A decision not to increase harvests at the present time should be based on the value of these timber inventories in alternative uses..."

FOREST SERVICE ACTIONS AND HOUSING COSTS

The Forest Service controls about 51% of the total inventory of large softwood timber in the United States. It supplied 27% of softwood timber products consumed in 1970. Lumber and wood products account for 14 percent of the total cost of a single family home, more than any other material component. The cost of components other than wood products are influenced

by thousands of competing producers, consumers, and regulatory agencies. No single agent of influence has as direct an influence over the cost of a housing component as the Forest Service has over the cost of lumber and timber products used in housing. As a government agency that is also an oligopsonist, the Forest Service has a responsibility to actively seek ways to reduce the rate of increase in the costs of lumber and timber products used in home building.

RARE II DES ALTERNATIVES AND HOUSING COSTS

The RARE II DES presents 10 alternative allocations of the 62.1 million acres of RARE II lands. These lands contain 26.5 million acres of commercial forest land capable of a programmed harvest level of 3.1 billion board feet of timber products. The current actual harvest level from National Forests is 10.5 billion board feet. Total national production in 1977 was 66.2 billion board feet. The Forest Service estimates that national forests could potentially supply 16 billion board feet per year, and the RARE II commercial lands could provide 6 billion board feet of this total.

Since it is not known how economically feasible it is to reach the potential 16 billion board feet output level, and since it is not likely that there will be marked advances in timber productivity and utilization to offset declines in programmed harvest, the most severe impact of allocating lands to wilderness is an estimated reduction of output of 3.1 billion board feet per year. Long term potential loss may be as great as 6 billion board feet per year.

The alternative which would cause a near term 3.1 billion board foot loss is alternative J, which places all lands in wilderness. This is not a politically feasible alternative, nor is it likely that no land will be placed in wilderness (alternative B). This leaves a range of alternatives which reduce long term potential sawtimber harvest from commercial forest lands by 5 to 27 percent.

A study by Data Resources, Incorporated (DRI) has estimated the impact of 1.0, 2.0, and 3.0 billion board foot reductions in annual timber sales. These options cover the range of decreases in timber sales that might occur from the allocation of roadless areas. The DRI study determined that a 3.0 billion board foot reduction in timber supply would result in an additional cost of \$1,789 or 2.9 percent to the median home price by 1980. This effect would also be felt in the market for used housing due to intermarket competition. By 1985 the price difference between no reduction and a 3.0 billion reduction is estimated at \$1,991 per single family home. A quarter million new homes could be built with 3.0 billion board feet of timber.

While smaller reductions in timber harvest may produce smaller price increases³ these increases should be viewed in the context of recent trends in housing prices. Housing prices have been increasing at 10 to 12 percent per year. Additional increases resulting from a reduced timber supply would aggravate an already undesirable trend. With higher prices, new home down payment requirements increase and lead to the disqualification of households whose incomes are not great enough to cover the higher mortgages that would be required.

³
A 1 billion board foot reduction would cause a \$611 difference in 1980 and a \$862 difference in 1985.

If 1.2 million new single family homes are started in 1980 (the estimated 1978 start level), a 1 to 3 billion board foot reduction in timber supply would result in an additional cost to consumers of between \$.73 billion and \$2.1 billion. The Forest Service has not computed these costs or even attempted to compare them with the benefits of allocating commercial timberland to wilderness.

LOWER INCOME HOUSEHOLDS BEAR THE COST OF INCREASED WOOD PRICES

A study reported in the Journal of Forestry (Ficht, 1977) shows that increases in cost of lumber and wood products will result in lower income households spending a greater proportion of their incomes for wood products than higher income households. The non-proportionality of impact is attributable almost exclusively to housing expenditures. In particular, the impact is most disproportionate on households that are purchasing homes for the first time. When lumber and wood products cost increases cause the price of new homes to go up, demand for existing homes rises. This in turn pushes up the price of existing homes. Thus homeowners enjoy an increase in the value of their home which they will benefit from when they sell it. However, first time home buyers bear the brunt of the increase since they lack an investment whose value increases when prices go up.

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H. RICHARD SEIBERT, JR.
Director
Natural Resources

September 29, 1978

The Honorable John R. McGuire, Chief
U.S. Forest Service, U.S.D.A.
P. O. Box 2417
Washington, D.C. 20013

Re: Comments on RARE II Draft Environmental Statement,
U. S. Forest Service, June, 1978

Dear Chief McGuire:

These comments on the Roadless Area Review and Evaluation (RARE II) are offered on behalf of the National Association of Manufacturers, a voluntary business organization. The NAM represents about 12,500 member firms which employ a majority of the country's labor force engaged in manufacturing and which produce over 75 percent of the nation's manufactured goods. The Association also represents 125,000 firms affiliated with the NAM through the National Industrial Council. Over 80 percent of the NAM's members are generally classified as small businesses.

As a national association, the NAM's comments will broadly address the RARE II process. We trust that our member companies will comment on a site specific basis.

Preferred RARE II Alternative*

The NAM realizes that designations of areas for Wilderness or non-Wilderness status will be made on a case-by-case basis; however, we will comment on the general process by which specific sites will be evaluated.

The NAM prefers the multiple use management alternative where only those areas peculiarly unfit for productive utilization are classified as Wilderness areas and continued planning areas are kept to a minimum. Alternative B, allowing all RARE II inventoried lands to be allocated to nonwilderness uses, is preferred because existing multiple use laws call for the evaluation and consideration of all competing uses in the land use decision making process. The National Forest Management Act requires that land management plans conform with that use which is most appropriate for a specific area given its particular qualities and characteristics. In making Wilderness designations, it is essential that only those areas which have the highest Wilderness attributes be selected for inclusion in the Wilderness System. The land must be unique, truly roadless, untouched by man, and offer a true, pristine wilderness experience.

* References are to specific alternatives as set forth in the Draft Environmental Statement for RARE II, U.S. Forest Service, dated June, 1978.

The economy of the United States, like that of all industrialized nations, is highly dependent on energy and minerals. However, the U.S. domestic consumption of these basic materials is greater than the domestic production; consequently, the U.S. relies to a substantial degree on imports. Last year, we imported 47 percent of our oil and gas at a cost of \$48 billion, and 50 to 100 percent of many of our other critically needed minerals. Our balance of trade deficit last year was \$26 billion, and is one of the important causes of dollar devaluation. Government projections indicate that our imports of critical materials will continue to increase. This dependency on foreign sources can be moderated to the extent that we identify a greater number of domestic sources and begin developing them.

Our public lands in Alaska and the Lower 48 States are not only our "Last Frontier" for Wilderness and habitat preservation, they also constitute our last unexplored frontier for oil, gas and other minerals. Public lands contain approximately 50 percent of all known U.S. energy resources: 40 percent of all U.S. coal, 70 percent of all U.S. low sulfur coal, 75 percent of all U.S. oil shale, 85 percent of all U.S. tar sands, 15 percent of all U.S. developed oil reserves, 15 percent of all U.S. discovered oil reserves, 33 percent of all U.S. estimated oil resource base, 20 percent of all U.S. developed gas resources and 43 percent of the U.S. estimated gas resource base. However, in 1976 only 10 percent of U.S. energy production came from these public lands often because of restrictive land-use policies. For example, the Overthrust Belt, which is a potential "off limits" Wilderness area, holds an estimated 8 billion barrels of oil and 50 trillion cubic feet of natural gas. Is it not common sense to tap these U.S. oil and gas reserves?

The National Forests contain 52 percent of the nation's entire timber suitable for construction lumber and plywood. Homebuilding is the largest single use for this timber. The National Forests, however, supply only 27 percent of the nation's timber harvest. This government administered wood resource is needed for home building and other construction. An artificial timber shortage means a scarcity of wood products for home building--and higher prices for home owners.

A study prepared by Data Resources, Inc., found that a reduction of three billion board feet in the supply of timber from the National Forests would increase the price of an average single-family home by \$1,789 over the next two years--an increase of nearly three percent. Similarly, a three billion board foot reduction in timber supply would result in a net loss of 15,000 jobs in the lumber and wood products industry by 1980, and an average yearly net loss for the period 1980-1985 of 23,000 jobs.

Other studies have shown that for each job in the forest industry, there are roughly two additional jobs in support and service sectors. The loss of 15,000 direct jobs would, in turn, mean the loss of another 30,000 jobs in other sectors, and a loss of 23,000 direct jobs would mean a total employment loss of 69,000.

Increasing the number of timber sales on our National Forests, as proposed by President Carter to fight inflation, would result in lower housing costs and increased employment. For example, a one billion board foot increase in the National Forest timber harvest would create 9,000 additional direct jobs by 1981, which would mean an additional 18,000 indirect jobs, for an employment gain of 27,000.

Some preservation groups view Wilderness as a means of "preserving" forests. However, trees, like all living things, grow to maturity and die from old age, disease, fire and insects. Wilderness designations limit disease, insect and fire fighting control. Not only do such restrictions endanger the ecosystems within Wilderness areas, but also the surrounding non-Wilderness forests. Managed forest areas, however, can serve many needs -- wildlife habitat development, water development and timber production.

The cost of non-utilization of resources as well as the loss of recreational activities must also be realized. To the public, Wilderness is often confused with other recreational lands that offer a wide variety of outdoor activities, including a number of Wilderness-type experiences. Multiple-use forests provided 192.8 million visitor-days of camping, hunting, fishing, skiing, snowmobiling, motorcycling, boating, off-road driving and sightseeing to Americans in 1976. On the other hand, Wilderness areas, by curtailing most of these activities, provided 7.1 million visitor-days, only 3 percent of our total forest recreation. Several studies have shown that because Wilderness requires expensive outdoor gear and these areas are remotely located, less than 10 percent of Americans will ever get to and enjoy Wilderness areas.

Comments on Criteria Used By the U.S. Forest Service

The NAM believes:

o The highest and best use of the land should be added as a criterion. Consideration would then be given to the resource productivity of the land.

o Land form representation and ecosystem representation is not required by law (Wilderness Act, etc.), and should not be given top priority. While land form representation and ecosystem representation may have relevance to "rounding out" Wilderness preservation areas, the weight given to these criteria should be minimal when balanced against statutory requirements and the considerable resource needs of the country. Over emphasis of these additional criteria would result in the Wilderness designation of highly productive land merely because of unusual physical, not Wilderness, characteristics. Over reliance on these criteria should be avoided not only because of the potential for withdrawing productive land from use, but also because it is questionable whether such criteria is particularly useful in the allocation of land which will provide the "Wilderness experience."

o The national costs of Wilderness designation should be paramount. Inadequate consideration has been given to the economic impacts of Wilderness designations due to the lack of any objective means to measure the costs of such designations. The dollar cost of any alternative should be quantifiable. The criteria as now expressed are not all quantifiable and, therefore, it is impossible to net them out. Consequently, decisions regarding designation of Wilderness areas are particularly subject to subjective considerations.

It is therefore suggested that an objective cost grid analysis be developed with background data to substantiate the valuations. This, of course, does not eliminate the subjective element totally, but it would require the decision makers to fully evaluate the bases for the competing costs.

o The Resources Planning Act (RPA) Wilderness targets should be the basis for determining the amount of land to be designated as Wilderness areas; reliance should be placed on those criteria based on law and/or Congressional intent. In this regard, Wilderness designations should be reflective of the RPA targets which establish the amount of land to be so designated without adversely affecting the other RPA goals for timber, minerals, range, water, outdoor recreation, etc.

Future Planning Areas

The objective of RARE II is to resolve the uncertainty that has persisted in the management of our National Forests. To designate a substantial amount of areas as "further planning" would only prolong these much needed land management decisions.

The NAM believes that only a minimal amount of areas should be allocated to further planning status. Also, there should be a specific time frame in which all future planning areas should be designated Wilderness/non-Wilderness. The U.S. Forest Service has been studying its "roadless" areas for years. Now is the time to make final designations rather than permitting de facto Wilderness to persist. It is necessary to implement multiple use planning and development in order to meet the nation's economic needs. If there is delay in final categorization, it must be minimal.

Thank you for the opportunity to comment. We look forward to continuing our working relationship with the U.S. Forest Service on this important study.

Sincerely,

H. Richard Seibert
H. Richard Seibert, Jr.



National Audubon Society
950 THIRD AVENUE, NEW YORK, N.Y. 10022 (212) 432-3200 CABLE: NATAUDUBON

September 27, 1978

Mr. John R. McGuire
Chief, U.S. Forest Service
Washington, D.C. 20250

Dear Mr. McGuire:

The National Audubon Society is pleased to submit the attached comments on the Draft Environmental Statement for RARE II and also comments submitted by our Southeast Regional Office on specific areas in the Southeast. Other specific area comments will be submitted by our Regional Representatives and Chapters to appropriate USFS Regional Offices.

National Audubon's position is that our primary interest is the conservation of intact ecosystems and the support systems which are necessary for their proper function. This approach does not necessarily require a bias toward any particular successional stage of the ecosystem. In that context, our position on RARE II is that as a matter of principle most of the remaining roadless areas should be incorporated within a wilderness area. However, management options in addition to wilderness, multiple use and further study should be available for consideration within the RARE II process.

Sincerely,

Elvis J. Stehr

Elvis J. Stehr
President

EJS:ea

NATIONAL AUDUBON SOCIETY
950 Third Avenue
New York, New York 10022

Comments of the National Audubon Society
on RARE II Proposals

I. Comments on "Criteria for Decision," p. 67-68

A. The 1975 RPA goals for wilderness were set under the 1974 Forest and Rangeland Renewable Resources Planning Act, since amended by the 1976 National Forest Management Act. These goals are predictably low. We do not agree with the idea of using this low wilderness goal as an upper limit for wilderness allocation. National goals for wilderness could be set much higher without any adverse impact on commodity production, and we urge that the 1975 RPA wilderness goals be dropped as a criterion for decision.

B. The "national objectives and needs" discussed under the second criterion (p. 67) are undefined. Needs for what? Wilderness? Timber? Minerals? Clean air and water? Oil and gas? Open space? Solitude? Opportunities for wildlife-oriented recreation? Livestock? By whom are these needs to be formulated? Who defines state and local needs, who defines national needs? In general, the "needs" considered by this EIS have been needs only for commodities like lumber, coal, or red meat. We believe that there exist national needs for wilderness and solitude, for primeval forests, for watershed protection, for wildlife conservation, for high-quality air and water, for stable and fertile soils, and for primitive recreation.

C. Why are costs/impacts of allocating areas to wilderness considered only in terms of "commodity outputs foregone?" This approach embodies a negative attitude toward wilderness and exclusively considers commodity production. The benefits of wilderness allocation, such as increased tourism, sales of wilderness recreation equipment, air and water quality maintenance, conservation of wildlife populations, soil conservation and stability and watershed protection are evidently not to be considered. This ensures a negative, one-sided approach to wilderness designation and also ensures consideration of only local concerns. To the contrary: the lands in question

are federal lands and are of concern to all the people of the United States. In fact, this criterion (top of p.68) seems completely at odds with the one just discussed in this respect.

We note that no criterion of cost effectiveness is included here. In many cases commodity outputs require substantial federal subsidies for road construction and other costs. In these cases wilderness designation may be economically the most sensible option. It would be a serious mistake for the Forest Service to base decisions only on a criterion of "commodity outputs foregone" without a simultaneous evaluation of the costs of producing these commodities -- costs including loss of de facto wilderness to our society.

D. "National issues such as energy independence, housing starts, inflation, ..." as well as "high timber potential" are to be given top priority for allocation to non-wilderness. No mention is made of high WARS ratings, valuable and unique wildlife populations, soils which are particularly fragile, unusual and spectacular scenic beauty. Such issues should receive high priority in considering areas for allocation to wilderness, in conjunction with "energy independence..." etc.

E. "Roadless areas will be evaluated for their contribution to the goals established for each identified characteristic." The National Audubon Society disagrees with this submission to a quota system. Each area should be evaluated for its wilderness qualities, independent of its ability to fulfill some arbitrary and artificial quota system. While "diversity and quality of the NWPS" is a laudable goal, we think this will be more likely fulfilled if the areas are judged on their own merits. An example: an area which has mediocre wilderness ratings could be assigned wilderness status just because it fulfills a landform quota, while areas with far better wilderness qualities could be assigned nonwilderness status just because they did not contribute to this quota system.

F. Roadless areas on the National Grasslands should be considered for wilderness designation in all cases. They are remnants of a rapidly vanishing ecosystem and, as such, would be extremely valuable parts of the NWPS. In terms of ecosystem representation they are a vital part of the national heritage. The Wilderness Act has provisions in it which would allow traditional and usual access by cattlemen using these areas.

G. One criterion for designation of RARE II areas which should be added is that of continuity with BLM roadless areas. In no case should Forest Service roadless areas contiguous with BLM roadless areas be released to non-wilderness uses until the BLM's roadless area review is finished. The additional BLM lands in some cases enhance an area's wilderness qualities and make it a prime candidate for addition to the NWPS.

H. Why not include as a criterion for determining the presence of high-quality wildlife habitat, diversity of habitat types, and the importance of the area for breeding or migration? Wilderness-associated and wilderness-dependent species are a good indicator of wilderness quality, but there are also many areas possessing abundant and varied wildlife which do not support the species listed in the EIS. Intact, functioning natural communities should be included as a criterion for decision.

I. Why not develop a system of rating timber, mineral, energy, grazing and other development potentials, similar to the wilderness-rating system (WARS) and use it as an additional basis for decision-making? The wilderness attributes of roadless areas have been quantified; doubtless the same could be done for the other resources under consideration. This would give the public some idea of the cost-effectiveness of developing resources for commodity output as opposed to wilderness designation. Such a process would result in a far more realistic resolution of RARE II.

II. General Comments on the RARE II Environmental Impact Statement

A. The "quota" idea on which alternatives E,F and G are based ensures that wilderness areas will not be evaluated on their own merits. The function of the Forest Service is not to fill some arbitrarily set quota but to manage the public lands under its jurisdiction for the benefit of the American people. One can argue the definition of "benefit" but one cannot argue that setting artificial goals for so much ecosystem representation, so many landforms, etc. achieves it. There can never be too much wilderness protected; what we have now is but a small remnant of what once existed, and it is an important part of the American heritage. The benefits of wilderness -- for research opportunities, air and water quality, watershed protection, soil conservation, recreation, solitude -- cannot be quantified as neatly as can timber production, for example. If an area is considered only for how it fits into an arbitrary quota system, values such as these are lost or ignored. The quality and diversity of the wilderness preservation system can best be assured by designating as wilderness those areas which best qualify -- not by emphasizing their contribution to goals set by the government.

B. The draft EIS is biased in favor of development of roadless areas, without any consideration of the cost of feasibility of such development. Commodity production receives highest priority in all discussions.

This is most blatant in the range of alternatives offered. The average non-wilderness acreage proposed is 76%, with the range being 37-94%. The average wilderness acreage proposed is 17% of the total, the range being 6-33%. In the interests of balance and objectivity several alternatives should propose wilderness acreages between 34% and 94% and nonwilderness acreages between 5% and 36%. There are no alternatives in the EIS which do this, for no apparent reason other than the Forest Service's traditional outlook toward timber production and commodity output.

and to data on mineral and energy potential presumably collected from the industries involved. Thus the reader of the EIS cannot check these figures or evaluate their accuracy.

D. The Forest Service is to be commended for the Wilderness Attribute Rating System, on which the rating of wilderness potential of the roadless areas is based. It reflects to some extent the definition of wilderness given in the Wilderness Act and is much improved over the rating system of RARE I.

However, the WARS has flaws. It is not, as is stated therein, an objective means of evaluation. Much is left to the rater's personal discretion. Three out of the nine criteria for natural integrity -- evaluation of the effects on natural process, duration of the impact if left uncorrected, and feasibility of correcting the impact -- are highly subject to personal bias (p. 13). The rating of "apparent naturalness" is completely subjective and additionally may be influenced by what time of year the rater investigated the area in question.

The WARS also requires a good deal of expertise and on-the-ground research. For example, the section on the "Natural Integrity" attribute asks to what extent the plant species composition of an area has been altered (p. 19). It would take a trained plant ecologist years of field research to answer that question, as well as extensive literature review on the vegetation of the area before it was disturbed. Historical accounts of most areas do not exist. Expertise is also needed to evaluate "wildlife management" and "elimination of native plants or animals or non-indigenous plants and animals" (p. 16) in an area -- expertise that only can come from an experienced wildlife biologist. Again, the question is whether all raters fit that description.

Finally, we question the ability of raters to determine much about plant species diversity or wildlife management if field investigations were made in winter, as they evidently were, after development of the WARS.

The "Opportunities for Solitude" attribute is rated on the basis of 5 components, two of which concern size of the area. Despite the statement that "Size of an area when considered by itself is an inadequate measure of potential for solitude..." size is consequently given a dominant role in determining this attribute rating. In the event that topographic screening and vegetative screening cancel each other out -- possible in areas with high topographic relief and low vegetation profile such as the alpine tundra -- we are left with two measures of size and one of off-site intrusions. Thus this attribute rating is two-thirds a size rating.

The system to evaluate "Primitive Recreation Opportunities" (pp. 34-37) is similarly biased. First, although the working definition of "primitive recreation" is not limited to "opportunities for isolation from the evidence of man," the first four rating components seem to apply only to that aspect of the definition. Consequently, this aspect is 4/7 of the rating. Absence of man-made facilities is a much more important factor in "primitive recreation" yet the present rating system gives it only a weight of 1/7 of the total. We fail to see how vegetative screening is the deciding factor in a wilderness fishing experience, for example.

The diversity component of this attribute seems unnecessary. We are not rating "Primitive Recreation Opportunities" on the number of different opportunities, but only on the basis of availability. The challenge component also seems unnecessary. How much "challenge" must there be to hike, fish, hunt, study nature, etc. especially in the eastern United States?

The supplementary wilderness attributes add an important aspect to the WARS. Under "ecological" aspects (p. 41) we feel that the presence of intact or nearly intact plant and animal communities, not merely the presence of endangered or threatened plant and animal species, is an important factor to consider. Although endangered or threatened species are good indicators of

habitat quality, wilderness should primarily preserve the total ecological community. The extent of integrity in the plant and animal communities should be considered here.

E. The use of multi-county units in the supplemental EIS blocks realistic consideration of impacts. As it now stands, the designation of a roadless area as wilderness or non-wilderness is assumed to impact only the multi-county area in which it is located. This does not reflect reality in a highly mobile society such as ours. For example, in Colorado designation of an area will affect Denver (which is not included in a multi-county unit), which is the source of many demands, both for wilderness values and commodity production, on the roadless areas being considered. In addition, designation of areas will affect users from outside the state in question. The resources to be derived from RARE II areas, whether timber, solitude, air quality or minerals, can be said to have a national market.

F. The data presented on commodity needs, local impacts, and national goals for minerals and energy, timber, housing starts, inflation and other items are too vague to justify any conclusions on these subjects. We simply do not know if the resources of an area are needed to meet national and local needs for commodity production. Only for wilderness is such a judgement attempted. The Forest Service should not designate an area as non-wilderness unless production of its commodities can be shown to be critical to the national interest.

G. The philosophy expressed by the EIS generally reflects an undue concern for timber production. We believe that this should not be the sole concern of the Forest Service, nor the major one. Government agencies are responsible for the interests of the whole society: interests such as clean air and water; stable soils; flood, erosion and siltation control; open space and solitude; wildlife; in short, those things which are the property and concern of all citizens.

II. Without a cost/benefit study or investment analysis "to determine if it is economically feasible to harvest the resource" we have no idea of what the costs to society of allocation of roadless areas really are. We find no comments upon the costs of development to common property resources. Such costs include loss of wilderness and scenic values, loss of open space, loss of recreation opportunities in certain cases, deterioration of air and water quality, siltation and flooding due to improper watershed management, and loss of wildlife populations, among others. These costs, all of them with long-lasting implications, must be presented along with the short-term gains of "commodity production" which we do not even know is feasible.

III. Comments on Specific Sections of the EIS

A. Affected Environment - p. 13: Vegetation

It is stated that Kuchler's 1966 ecosystem classification system doesn't include pockets of vegetation less than approximately 50,000 acres. However, many of the RARE II areas are less than 50,000 acres and many unique land forms and ecosystem units may occupy considerably less. Rather than use a nationwide classification system which lacks the fine resolution needed, the Forest Service should use state-wide ecosystem analyses where such exist (as in Colorado). Another option would be consultation with local or regional plant ecologists to ensure a more comprehensive look at ecosystem representation in the various states and help preserve unusual or rare ecosystems, especially units less than 50,000 acres.

B. Affected Environment - p. 14: Wilderness

Our wilderness areas are an important cultural and historical resource. American society is profoundly linked to the wilderness experience, and our culture has been shaped by its presence throughout our 350-year history. Wilderness is at least as important a cultural resource as historical and archeological sites and should be mentioned as such in the EIS. The perspective in

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which wilderness is put can be an important factor in decision-making processes such as RARE II.

C. Alternatives Considered - pp. 25-26: Accessibility/Distribution

First, the values of the ratios of population within a 250-mile radius of wilderness areas to acreage are not given. Second, no rationale is given for using the median value as the dividing point between counties meeting the accessibility and distribution characteristics and those not meeting them. Third, the use of the 250-mile radius ignores the fact that wilderness areas, even in the eastern United States, are subject to demands far beyond the 250-mile radius. It is not unrealistic to suppose that wilderness in the south-eastern United States, for example, would be used by residents of the Midwest and the northeastern United States, areas that are certainly more than 250 miles away. Western wilderness areas are used by vacationers from the East Coast with increasing frequency.

Fourth, the use of a quota system, while laudable in terms of organizing comments, sets arbitrary limits on how much wilderness people should have access to. By specifying "4 additional areas within 250 miles of counties in Category A, 3 additions within 250 miles of the Category B counties..." the Forest Service does just that. Since demands for wilderness are not localized and since we have no way of knowing how much wilderness people need, the quota system seems unnecessary. We suggest that ratios of accessibility be given, perhaps in an appendix (they are not given either in the national EIS or in the supplementals we have examined). This would aid the public in making decisions on RARE II but would not give the accessibility ratios decisive weight.

Basing alternatives on a quota system does not address either the needs of the American people for wilderness or the Forest Service's responsibility for good land management. It should be noted that even if some wilderness is

inaccessible for some people, its benefits remain: wildlife preservation, watershed protection, air and water quality maintenance, educational and inspirational functions, research opportunities, primitive recreation.

F. Effects of Implementation - p. 35: Vegetation

The EIS states that "there will be no impact on threatened and endangered plant species resulting from the allocation of roadless areas, for the species will continue to be protected by law regardless of the allocation." This is unlikely, for in the event that development occurs, populations would be reduced and habitat altered, though perhaps not enough to cause extinction. Recent developments in Congress (i.e. amendment of the Endangered Species Act) suggest that protection under the Act is not absolute in any case. We note that many species' habitats are under intense pressure from mining and real estate interests, for example, and allocation of roadless areas one way or another will definitely affect them.

G. Effects of Implementation - p. 37: Recreation

Again, discussion focuses on the negative aspects of wilderness recreation: cut-backs, lack of roads, etc. -- rather than on the increase in wilderness opportunities.

The EIS figures project a capacity for dispersed non-motorized recreation double that at present "if all provisions of existing management plans are implemented." This is no guarantee of continuing opportunities for this type of recreation. Since management plans are to be revised periodically under the Renewable Resources Planning Act of 1976, it would be notable indeed if "all provisions" were unaltered and implemented. The Forest Service has no way of foreseeing emergency demands on areas or development of new mineral or energy sources which could make an area totally unsuitable for dispersed non-motorized recreation, or motorized recreation too.

Nowhere in this section is the value of wilderness for certain types of wildlife research mentioned. Many species, while not wilderness-dependent, remain at normal population levels only in wilderness areas. Typical behavior and population dynamics can be observed only in wilderness in such cases. Dr. Maurice Hornocker of the University of Idaho has stated that "established, viable wildlife populations in wilderness can provide answers to many questions concerning the preservation and maintenance of wilderness and all its components." Later he remarks that "relatively unexploited wildlife populations provide (the) natural gene pools; they can provide an insight into intrinsic behavioral mechanisms that can and should form the basis for any management program outside Wilderness (our emphasis); they can provide an insight into all those population processes against which we can measure our influences elsewhere."

Dr. Hornocker also points out that "in the wilderness laboratory, the opportunity exists to describe and delineate critical habitat for a particular species... before it becomes endangered," thus saving the government and the taxpayers time, effort and money.

Thus wilderness can play a valuable role in conserving species which may become or have become endangered; in providing a base line against which to measure habitat deterioration or population changes outside wilderness; and in evaluating wildlife management techniques used outside wilderness areas. The EIS, biased as it is toward commodity production, ignores points such as these.

J. Effects of Implementation - pp. 51-53: Economics

The economics section of the Environmental Impact Statement is based on insufficient evidence and cannot be used as a tool in decision making.

On page 51 the EIS states that "a benefit-cost study or investment analysis to determine if it is economically feasible to harvest the resource has not been made. Likewise, a demand study to see if the resource output could or would be sold at current prices was not made." Without these kinds of

information, valid estimates of economic costs and benefits to society of designation of roadless areas cannot be made. The statistics cited as measuring effects on timber production, mineral production, employment, recreation, etc. have no basis in fact, and most of the economic impacts described by the EIS are not only open to question but are worthless as an accurate estimate of impacts.

In short, despite the Forest Service's efforts, we still do not know what the economic impacts of wilderness or non-wilderness designation will be. We certainly cannot base decisions on the information presented in this EIS.

The Economics section has no comments upon such costs of development as loss of wilderness values, loss of recreation opportunities (including the economic benefits of tourism), deterioration of air and water quality, soil erosion, loss of fisheries or destruction of wildlife habitat. Impacts are considered solely from the point of view of "commodity production" losses.

A cost/benefit study which takes into account the factors mentioned in the preceding paragraph is desperately needed before an objective of RARE II can begin. We urge that no decisions be made before such a cost/benefit study has been completed.

J. Effects of Implementation - p. 53: Housing Starts

The EIS states that "Alternative J produces the most impact..." This statement misleads the reader, for under the Forest Service assumption that all the known timber resources are equally harvestable (see Economics or Timber sections above) Alternative B also has a maximum impact -- maximum production of timber and loss of wilderness! This is yet another example of Forest Service bias towards commodity production.

This discussion is extremely general and makes several unwarranted assumptions. One is the assumption mentioned above, that all timber is equally harvestable. Another is that wilderness designation would have a

Tellico Dam in Tennessee will cause submersion of several hundred historical Cherokee Indian sites. The coal strip mining in the Four Corners area of the Southwest has not protected the cultural and spiritual resources of the Navajo peoples there. This assumption can be refuted by a number of other examples and has little general applicability.

Some management is possible under wilderness designation, a fact the Forest Service chooses to ignore.

References:

1. Hornocker, Maurice. 1978. Interactions between Threatened and Endangered Species and Wilderness. unpub. MS.

September, 1978

National Campers and



Hikers Association Inc.

27 September 1978 "The Friendliest People in the World"

Mr. John R. McGuire, Chief
Forest Service, USDA
P.O. Box 2417
Washington, D.C. 20013

We are the National Conservation Directors of the National Campers and Hikers Assoc., Inc. Our membership of approximately 204,000 individuals come mostly from the United States with others in Canada and some foreign countries.

We are responding to the Rare II Roadless Area Reviews. We have studies several of the Draft Environmental Impact Statements and their supplements.

We feel that to retain these areas as multiuse under prudent conservation management offer greater protection and preservation for future generations.

Forest without conservation management grow fallow, become unable to support wildlife and prime targets for devastation from forest fires: (example, Vantanna Wilderness)

The Wilderness status offers no protection from insect damage (i.e. gypsy moth especially in eastern states) or fires.

Even areas which have outstanding aesthetic qualities and irreplaceable resources benefit more from prudent conservation management.

Therefore we recommend that all areas remain in multiuse status where they can be better protected as well as contribute where and when possible to the economic and recreational needs of the areas. We feel that a larger percent of Americans present and future will benefit more from multiuse with prudent conservation management.

Sincerely Yours,

Tommy & Helen Kirkland

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Ray Shields, 1st Vice Pres., NCHA

HK

NON-PROFIT EDUCATIONAL FAMILY CAMPING ORGANIZATION
LOVE THY NEIGHBOR - LOVE THY GOD

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SUMMARY

National Forest Products Association Recommendations

Based on the general comments and the detailed analysis that follow, NFPA recommends the following RARE II actions be adopted by the Forest Service:

1. Non-Wilderness -- Timber

The Forest Service should not select any of the ten specific Alternative Approaches included in the DES, but should provide for an allocation of areas to non-Wilderness which:

- a. will assure the ability of each Forest Service region to meet assigned Resources Planning Act (RPA) Program targets for timber resources; and
- b. reflect local recommendations regarding areas or portions of areas needed to maintain dependent industry or community stability.

2. Non-Wilderness -- Other Resources

Roadless Area allocations should also give priority to achievement of RPA goals for other non-Wilderness resources.

3. Wilderness

After consideration of allocations needed to meet RPA Program targets for non-Wilderness resources, the Forest Service should allocate to Wilderness those roadless areas in the RARE II inventory which can make the highest quality contribution to the RPA Wilderness goals.

4. Future Study

NFPA urges that the least possible acreage be allocated to future planning and that any such allocation be made only after assurance that RPA non-Wilderness goals can be met.

5. Prompt Release of Areas Allocated to Non-Wilderness

NFPA urges that the Administration take immediate action at the time the Final Environmental Statement (FES) is completed to release for management those areas determined to be suitable for non-Wilderness use. Such action should include Presidential or Secretarial direction to the Forest Service to undertake planning and management of released areas without further consideration of their potential designation as Wilderness.

General Comments

NFPA strongly supports the RARE II objectives of resolving uncertainties surrounding the millions of acres of undeveloped national forest lands involved

in the RARE II inventory. It looks to RARE II to expedite release of areas which have primary value for multiple use purposes other than Wilderness.

RARE II must be related directly to The Resources Planning Act process. Decisions on Wilderness allocation for the 30 percent of the national forest timberlands involved in RARE II will have immediate and major impacts on the ability of the Forest Service to produce non-Wilderness resources. The focus of the RARE II decision should, therefore, be on the role the roadless lands can play in meeting all national forest resource goals, as outlined and approved through the RPA process.

As a part of the RARE II decision process, the Forest Service must make a careful analysis of the existing and future demand for Wilderness. The forest industry supports the RPA Wilderness goal of 25-30 million acres of national forest Wilderness, but urges that this goal be met without effect on the Forest Service's ability to provide for RPA target levels of other non-Wilderness resources.

With respect to the timber supply situation, the 1975 RPA Program set forth the proper National Forest System contribution to meeting projected timber demands. Recent events have given further weight to the correctness of the RPA timber targets. The Program was based on the assumption that the bulk of national forest commercial timber levels would be available for management. Any significant loss of this timber land base through RARE II and other pending actions would make it difficult or impossible to meet RPA timber goals.

The Draft Environmental Statement (DES) contains an acceptable range of alternative approaches. However, NFPA recommends the Forest Service not select any of the specific alternatives, particularly because their effects on the timber base and RPA timber targets are not yet clear.

NFPA recommends an addition to the list of seven decision criteria discussed in the DES -- appraisal of Wilderness demand. Three of the DES-listed criteria -- RPA relationship, resources foregone, and national issues -- are recommended as "must" criteria.

NFPA defers to individual companies and to regional associations with respect to individual area recommendations. In reviewing and dealing with local public and Regional Forester area-by-area recommendations, the Forest Service should develop flexible means for handling boundary adjustments.

Detailed analysis of the DES is included as an Appendix.

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RPA -- THE FRAMEWORK FOR RARE II

The RPA Process

While NFPA strongly supports RARE II as an acceleration of part of the overall Forest Service planning and management process, it strongly believes RARE II must be related directly to the basic overall planning framework for the Forest Service -- the Resources Planning Act process.

The Resources Planning Act (RPA) is the statutory mandate for Forest Service planning and budgeting. Its purpose is to bring a sense of order to national forest programs. It was designed to avoid ad hoc decisions about one use of the national forests without consideration of the impact of those decisions on other national forest uses. As the Senate report on RPA explained:

"Questions relating to the condition and use of our renewable resources have increased in number and intensity over the last decade. Each issue has been raised independently and has been put forward with its own body of facts. The result has been an extended debate over what are the facts, a further extended debate over how one issue relates to others as well as whether the issue raised is a symptom rather than a cause. Time after time the quest has been for a quick and simple solution to the issue in the form it seemed to surface." S. Rep. No. 93-686, 93rd Cong., 2d. Sess. 3, 4 (1974).

RPA requires that day-to-day activities and programs be related to clear policy direction, based on an assessment of present and future national needs. Under RPA policy direction is proposed and developed by the Forest Service itself, reviewed by the Secretary of Agriculture, and forwarded to Congress for reaction and implementation through the appropriations process.

In short, the RPA process forces responsibility and accountability on the part of the Forest Service, the Administration, and Congress as to the nature and extent of Forest Service programs. It makes the implicit explicit. It forces clear answers to the question, "Why is the Forest Service doing this?" It forces measurement of the effects of annual appropriations and actions against what they will yield in the long run. It requires the Forest Service to say: "This is where we plan to go, this is how much it will cost, and these are the benefits that will result -- now, and in the future." Also, the consequences of delaying action programs are made very clear. Forest Service management programs are long-range programs. Decisions must be made now, investment must begin if we are to realize benefits and products fifty years from now.

The National Forest Management Act (NFMA) reinforced the Resources Planning Act process by directly linking National Forest land use planning to the resource goals developed under RPA. The draft regulations implementing Section 6 of the NFMA, published by the Forest Service on August 31, make this clear by requiring resource outputs and benefits on national forests to be directly related to the national and regional goals and targets assigned under the RPA Renewable Resources Program. Consideration of the RARE II

roadless areas apart from RPA goals and policies would undercut the NFMA planning process, which is intended to make national and regional RPA objectives come to life through the myriad of local land management decisions the Forest Service makes.

Impact of RARE II on the RPA Program

RARE II involves about one-third of the entire National Forest System, nearly 30 percent of the commercial timberlands of the National Forest System. Decisions on Wilderness allocation for a substantial portion of this area will have immediate and major impacts on the ability of the Forest Service to produce other non-Wilderness resources. It will affect the land base available to produce resources and will affect the balance of benefits and costs which can result after a major National Forest System land allocation occurs.

The RPA process is a multiple use process. It calls upon the Forest Service to provide a balanced, multi-resource program to meet the nation's wood and other resource product needs, while preserving adequate areas of the National Forest System to meet Wilderness needs and other undeveloped resource uses.

The 1975 Renewable Resource Assessment and Program met the mandates of the Act. NFPA has supported the resource goals and targets for timber, Wilderness, and other resources as set out in the 1975 Program. The Forest Service has begun to budget and manage within the RPA goal structure, and Congress has used the 1975 Program as a baseline in considering and approving Forest Service funding levels.

The June 14, 1978, RARE II DES gives little attention to the RPA framework and tends to treat RARE II with a primary focus on the needs and opportunities for roadless area preservation. NFPA, therefore, urges that the Forest Service change the focus of the RARE II decision to the role the roadless lands involved can play in meeting all national forest resource goals, as outlined and approved through the RPA process.

Relationship of RARE II Decision and 1975 RPA Program

In this light, NFPA urges that the Forest Service clearly relate its RARE II recommendations to its ability to meet 1975 RPA Program goals and targets.

As explained below, we understand that the 1975 RPA timber targets are based on an assumption that all commercial forest land areas, other than those identified for Wilderness study under RARE I, will continue to be available for timber management programs. If RARE II allocations affect this assumption, this must be made clear, as well as the impact of the allocations on short- and long-run timber targets. The same approach should apply to all other goals and targets in the 1975 Program, including Wilderness.*

* On page 50 of the DES a table is presented which seeks to portray the relationship of RPA and RARE II alternatives. The data in the table lead to the conclusion that most of the DES alternatives are compatible with RPA goals. NFPA understands that the Forest Service is revising this table to more accurately portray the significant effects of some of the RARE II alternatives on the achievability of other multiple use resource targets. The FES would benefit from a detailed discussion of the work done by the Forest Service since publication of the DES to more accurately portray RPA and RARE II relationships.

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out the National Wilderness Preservation System," should have devoted more attention to the question of how much Wilderness is needed. The DES provides little analysis of existing or projected demand for Wilderness and does not acknowledge that projected demand for Wilderness should be a major decision criterion in the RARE II process.

C. Factors To Consider In Evaluating The Need for More Wilderness

NFPA, therefore, recommends that, in addressing the question of how much additional Wilderness is needed, the following factors, which were used in the RPA Assessment and Program analyses, should be treated in the FES for RARE II:

1. Projected increases in demand for Wilderness and for resource uses which are incompatible with Wilderness.
2. Opportunity costs which would be incurred if areas are designated as Wilderness, but have value for uses which are incompatible with Wilderness.
3. The need for more Wilderness in terms of those recreational uses that can only be met by Wilderness designation. Recreation demand should be a primary measure of need. Although uses for scientific, educational, and historic reasons are important, actual use for these purposes is very limited. Under statutory limitations, Wilderness designation actually reduces or precludes research flexibility by restricting access and prohibiting monitoring and other instruments and, possibly ground plot identification. The amount of research actually being done in Wilderness, as well as the problems created by reduced research flexibility, must be given further study before research is used as a major factor to support additional Wilderness.
4. Appropriate components and scope of an "ideal" Wilderness System and the relative value of individual areas in meeting the criteria for what an "ideal" Wilderness System ought to be like.
5. Potential for meeting anticipated Wilderness demand on all federal lands.
6. Potential for more intensive use of existing Wilderness areas. Even in Wilderness areas which are now sustaining adverse environmental impacts due to use pressure, the major portions of the areas are unused due to lack of sufficient trails, camping areas, and access points. If these were planned for and provided, use could be dispersed more evenly over the total Wilderness area, thus increasing the carrying capacity of the area significantly. In addition, innovative visitor management practices are needed which will direct Wilderness travelers as to routes of travel, length of stay, size of party, and limitations on pack stock. Such measures will provide more effective utilization of existing Wilderness areas while still maintaining the quality of the Wilderness experience for visitors.
7. Potential for meeting Wilderness-type demands on areas devoted to multiple use management. The 1975 RPA Program stated "Studies

of Wilderness visitors suggest a substantial portion, perhaps a fourth to half, of the recreationists who now visit Wilderness would find what they are seeking as well or better in a non-Wilderness, roadless recreation area." Ways to meet the need for such recreation in a manner less extravagant than designating large areas for Wilderness should be explored.

Wilderness recreation and what the Forest Service calls dispersed non-motorized recreation are very similar in composition and in large part substitutable. The DES shows that several alternatives could actually reduce demand for this kind of recreation as compared to alternative J, which allocates all the roadless areas to Wilderness. For example, alternative H (which would allocate 73 percent of roadless area acreage to non-Wilderness, 16 percent to Wilderness, and 11 percent to Wilderness study) would, over the long term, provide almost 5 million more recreation visitor days of dispersed non-motorized recreation than would alternative J, the all Wilderness alternative.

8. Distribution of costs and benefits within major groups of society. Forest Service and other research reports indicate that Wilderness users are a very small percentage of the population. They are almost exclusively white, with high educational levels. They are primarily young adults, are white collar workers, and are in above average income brackets. In terms of national forest recreational use, Wilderness use is minor, accounting for only 3.5 percent of the total recreation visitor days use, in recent years. It has been estimated that less than 1 percent of the population has ever used Wilderness. Even though the benefits of Wilderness are realized by a very small percentage of the people, the costs are borne by all those who must pay the increased cost resulting from natural resource scarcity. Low income and minority groups are particularly hard-hit by rising energy costs and the cost of housing -- both of which will accelerate if substantial areas of the National Forest System are designated Wilderness.

Each of the factors discussed above are at least recognized in the narrative accompanying the 1975 RPA Assessment and Program. The FES should utilize whatever data and other information on these issues are available. Much of this data is being compiled as a basis for the 1980 RPA Assessment and Program.

D. Summary and Conclusion

The forest industry must urge strict adherence to the 1975 RPA Program goal of 25 to 30 million acres of National Forest Wilderness. This goal is generous in relationship to revised estimates of Wilderness demand and potential supply of Wilderness from lands administered by BLM and other federal agencies. The RPA goal appears to be the maximum which would provide a compatible interrelationship with other necessary high level resource system goals. A significant increase in national forest Wilderness would reduce the potential of all other Forest Service resource systems to meet future public demands for renewable resources.

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Certainly the use of, and demand for, Wilderness has increased in recent years and indicates a public need for such lands. Yet it must be remembered that Wilderness is mutually exclusive of every other major resource use, while other uses are largely compatible in the use of the same land base. This suggests that Wilderness is a very costly use which should be established sparingly only after evaluation of all resource use potentials and a rigorous justification for their loss in favor of Wilderness withdrawal.

Obviously there is a need to respond to the demand for more Wilderness use opportunities. Much more can be done by better utilization of existing areas. The need for national forest additions to the National Wilderness Preservation System must be considered in the context of the total land area available for this use, regardless of administering agency.

In the future, Wilderness will, in some portions of the nation, be in short supply, just as every resource use opportunity will be. Therefore, it seems rational that the criteria which must prevail will be optimum net benefits and that the only acceptable total management regime will have to be the one that will meet this criterion most effectively. Such a rational concept should place renewable and compatible resource uses at the highest level of priority.

THE TIMBER SUPPLY SETTING

Because RARE II decisions could have a major impact on national forest timber outputs, it is important to review the overall national timber supply setting. Basically, NFPA believes the wisdom of RPA Program goals and targets for timber resources has been supported by recent events and that RARE II decisions must be consistent with RPA. The reasons follow:

RPA Assessment and Program for Timber

Lumber and plywood made from softwood sawtimber are the primary building products used in home construction. It is estimated that wood products contribute about 15 percent to the cost of a new house. The 1975 RPA Assessment of demand for softwood sawtimber was based on the 1973 Forest Service report "Outlook for Timber in the United States." This report projected substantial rises in the demand for lumber and plywood products in virtually all major uses. It projected that between 1970 and the year 2000 the demand for lumber would rise by 75 percent and the demand for plywood by 56 percent.

The 1975 RPA Program set forth what the Forest Service considers to be the proper national forest contribution to meeting projected demand for timber. The Recommended Program called for timber management levels where anticipated costs would be commensurate with anticipated returns. Timber sale targets under the 1975 RPA Recommended Program would rise from about 10.5 billion board feet in 1977 to 14 billion board feet in 1980, an average of 16.5 billion board feet in the decade ending in the year 2000, and 18.5 billion board feet in the decade ending 2020.

Timber Supply and Prices

Since the 1975 RPA Program was completed, demand for wood building products has sent lumber and plywood prices to record levels, illustrating again the importance of assuring a reliable and steadily increasing supply of timber. Although 1977 prices were at record highs, production of lumber and plywood was not. In spite of the best markets ever, western lumber producing regions had difficulty in raising their production. In the face of high demand and record prices, production of southern pine in 1977 increased 8.6 percent over 1976 levels and Canadian softwood lumber imports increased 30.8 percent, but production of western softwood lumber increased only about 4.5 percent.

A primary cause of this lack of responsiveness to record prices is the uncertainty over future timber supply. Such uncertainties are created in large part by failure to fund national forest timber sale programs to levels set forth in the RPA Program. For example, in 1978 the Forest Service was funded to sell 11.5 billion board feet of timber instead of the 13.0 billion board feet called for by the 1975 Program. The uncertainties can also be traced to lack of confidence in future timber supplies from land identified as roadless in the RARE II program.

The Role of Private Forest Ownerships

Some interest groups have expressed the opinion that the key to meeting future demand for timber lies on the private lands, particularly nonindustrial or small private ownerships which contain about 59 percent of the nation's commercial forest land. The assertion made is that the nation can easily afford allocation to Wilderness of national forest timber in roadless areas.

The position does not stand up to close scrutiny. Industrial private ownerships have only 14 percent of the nation's commercial forest land but already contribute 34 percent to the annual U.S. supply of softwood sawtimber. These industrial ownerships lead the way in the application of sound forest management principles. While the level of management will continue to increase on these lands, the relatively small proportion of mature timber stands on these acres means that large increases in timber supply from this ownership class cannot be expected in the near term.

The next major ownership class -- 59 percent of the commercial forest land -- is held by small nonindustrial private owners. It must be recognized that the owners of these lands face a range of disincentives which make the possibility of these lands coming under intensive management for timber uncertain. Some of these disincentives include: (1) the small size of holdings which make some intensive forest management practices more costly; (2) absentee landownership; (3) ownership objectives that may not be compatible with intensive forest management; (4) inability or unwillingness to make necessary long-term financial commitments that are further penalized by the inheritance tax system; and (5) the unavailability of technical advice. Despite these and other difficulties, the small private holdings currently contribute 42 percent of the annual U.S. sawtimber supply (hardwood and softwood).

The forest industry feels that there is a potential for improving the management of these small woodlands over the long term and fully supports government programs designed to achieve this objective -- such as forestry incentives programs, technical assistance, and tax reform. But it is equally clear that investment in these lands now will not result in much additional marketable timber until after the year 2000.

These nonindustrial private lands tend to have significant deficiencies in growing stock timber (timber volumes per acre) as compared with the national forests which have a significant surplus in growing stock. Although they contain 59 percent of the commercial forest land, they have only 20 percent of the inventory of softwood sawtimber, compared to the national forests which have 51 percent of the softwood sawtimber. The current inventory and stocking of softwood timber on small private woodlands is not sufficient to provide for a significant increase in timber supply without threatening the long-term levels of output from these lands. This is especially relevant in light of the low levels of conifer regeneration in relation to harvesting on those lands.

Also of significance is the factor that the vast majority of national forest lands are located in the West, while nonindustrial private lands are in the East. A substantial reinvestment and relocation of milling capacity would be necessary to shift from one ownership supply to the other. This shift cannot be accomplished overnight and would result, in the short term, in reduced domestic

supplies of end products. Such a reduction would be partially offset through increased imports, further increasing the U.S. balance of trade deficit.

Clearly, timber that is not already relatively close to maturity will be unavailable to meet demand during the next quarter century. The national forests contain over half the total softwood sawtimber inventory in the nation. The timber is already there and does not have to be grown. Further, it should be emphasized that the RPA Program projects a substantial increase in supplies from private forest lands to go along with increases from public lands. It is not a question of one source or another. All must play their part if overall national timber objectives are to be met.

National Forest Timber Goals Cannot Be Met by Concentrating Forest Management Activities and Investments on Currently Developed Areas

The 1975 RPA Program was based on the assumption that all national forest commercial forest lands, not statutorily withdrawn from timber production or being formally studied for Wilderness in 1975, would be needed to meet mid- and long-range timber output targets. Any significant loss of the commercial forest land base would make it difficult or impossible to meet RPA timber goals.

Some wilderness advocates have claimed that many of the roadless areas containing commercial forest land could be allocated to wilderness by concentrating timber management activities and investments on currently developed national forest lands. These groups contend that if road building and other capital costs required to manage timber in the roadless areas were reallocated to more intensive management of currently developed areas, current and potential levels of harvest could be maintained.

The Forest Service study of this issue titled "Roadless Area -- Intensive Management Tradeoffs on Western National Forests," which has been in preparation for over a year and a half, has recently been made public. Seven western national forests were included in the study, which evaluated the impact of withdrawing (1) half the roadless areas and (2) all of the roadless areas on current harvest levels, on potential short-term harvest levels, and on long-term potential yield. The study also evaluated the implications of these withdrawals on employment, environmental and multiple use considerations, and on present net worth and revenue flows.

The study concluded that there is no possibility that intensive management on currently developed areas can replace potential short- or long-term harvest losses which would result with half or all of the roadless areas withdrawn.

A summary of the relevant findings of the study are as follows:

1. The study found that, under the environmental and multiple use constraints the Forest Service currently feels obligated to meet, the primary constraining factor on harvest levels is land, not capital. In particular, multiple use considerations constrain the rate at which regeneration harvest can take place. The rate of harvest in turn constrains the rate at which application of intensive management practices can take place.
2. The interdisciplinary teams on each sample national forest reasoned that if timber management activities were concentrated on the currently developed

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areas, environmental and multiple use standards would be violated. These varied from place to place on the same national forest, but consistently fell into three general categories: (a) watershed protection -- concern over unacceptably increasing sedimentation and/or the potential for mass soil movement; (b) aesthetics -- concern over unacceptably impacting current designated view zones; (c) wildlife considerations -- concern over violating guidelines for thermal cover for big game or other wildlife habitat needs.

Potential Impact of Land Management Planning and Silvicultural Regulations on the Land Base Needed to Meet Timber Output Goals

Forest Service evaluations as to the national forest land base needed to meet 1975 RPA timber goals were based on the assumption that current Forest Service multiple use and environmental protection policies would continue. The Forest Service has recently published draft regulations to implement Section 6 of the National Forest Management Act dealing with land management planning and silvicultural guidelines. The final regulations, when implemented, could have a very significant impact on the potential of the national forests to meet their share of the potential demand for timber. The recently published draft regulations appear to give Forest Service field managers appropriate flexibility to tailor land management plans to specific on-the-ground conditions. However, environmental groups appear to have initiated a major campaign which has the objective of obtaining final regulation language that would place severe limitations on the professional flexibility available to field managers. This would ultimately be a severe limitation on the ability of the Forest Service to meet RPA timber goals.

The RARE II exercise cannot, and should not, be viewed in isolation from these other factors which may limit national forest timber supply.

ADEQUACY OF DRAFT ENVIRONMENTAL STATEMENT

While these comments highlight a number of areas of the DES that need improvement, it is appropriate to underscore NFPA's support for the RARE II process as it is reflected in the June 15 draft. The Forest Service faced a major challenge in seeking to meet the objectives of RARE II. The possible combinations of areas and alternative approaches are infinite. The DES demonstrates that the Forest Service has approached the task with ingenuity and sound judgment, based on the fullest professional experience available relating to the allocation of National Forest resources.

NFPA recommends, however, that the statement be expanded in scope and in depth to better display the professional effort which has been made. These comments provide specific recommendations on how this can be done in the following areas:

- relationship of RARE II to RPA
- relationship of national statement and regional supplements
- selection of evaluation criteria and development of alternative approaches
- effects of implementation
- processes for selection of a proposal

Specifically, it is suggested that the final statement draw upon and refer to the wide range of program and site specific environmental statements which the Forest Service has already prepared. These can be incorporated by reference in the final document and can be used to describe the range of effects of the various RARE II alternatives being considered.

RARE II - ALTERNATIVE APPROACHES

It would appear that the DES contains an acceptable range of alternatives to meet the intent of NEPA. Unfortunately, none of the criteria used in the development of the alternatives was related directly to projected outputs of resources from the RARE II inventory needed to meet RPA Program goals. It is recognized that the criteria on which the alternatives are based were developed before it was decided to use the 1975 RPA Program goals as major decision criterion. Ideally, RPA should have been the primary framework within which RARE II alternatives were formulated, as well as evaluated.

NFPA has, nevertheless, given careful review to Forest Service estimates of the impact of each DES alternative on the commercial forest land base, on annual programmed harvest, and on annual potential yield. A chart summarizing these Forest Service estimates on the national level is attached as Enclosure 1. These figures show that if it is assumed that all areas in the further planning category will be designated Wilderness, only alternatives A, B, and E would meet or exceed current programmed harvest levels. If it is assumed that all further planning areas will be allocated to non-Wilderness, all alternatives except D and J would meet current programmed harvest levels. However, these same relationships do not hold for all regions. For example, under the assumption that all further planning areas are designated Wilderness, Region 2 shows a 14.7 million board foot per year increase in programmed harvest under alternative G, whereas Region 5 shows a 57.1 million board foot per year reduction. This points up the problems associated with casting up alternatives not directly linked to RPA output levels.

NFPA recommends the Forest Service not select any of the specific DES alternatives at this time, for the following reasons:

1. Based on the NFPA understanding of the RPA Program analysis, some additional Wilderness from the National Forest System is justified and can be provided without undue impacts on other essential resource uses. Alternatives A and B are inconsistent with this approach since they would provide no additional Wilderness.
2. Aside from alternative A and B, only alternative E would maintain the commercial forest land base, programmed harvest and potential yield in all regions. However, even for alternative E there is no information yet available to show how it would impact employment and community stability in local areas. It is not enough to look at timber impacts only on a regional basis. Significant and devastating impacts can occur locally while maintaining or increasing regional harvest levels.
3. Because of uncertainty over how areas in the further planning category may eventually be allocated, NFPA cannot recommend any alternatives which have a large acreage in this category.
4. Information to fully assess the timber related impacts of the ten DES alternatives is not yet available but is being developed by the Forest Service for the FES. Knowledge of the theoretical impacts on commercial forest land, on programmed harvest, and on potential yield,

is not enough. Information is also needed on the productivity of the areas involved and on whether the programmed harvest and potential yield can actually be achieved. Information is needed on the kinds of program changes (with estimates of costs) that will be needed as a result of changes in the land base. Anticipated changes in Forest Service programs and the cost of implementing them as a result of such changes must be evaluated.

5. NFPA is also concerned with the misleading wildlife criterion used by the Forest Service in developing the Alternative Approaches. The criterion "wildlife associated in the minds of the public with wilderness" implies a dependency of certain species upon formally designated Wilderness. NFPA believes there are few, if any, species which are wilderness-dependent, and that formal Wilderness designation can actually complicate management of areas to assure the survival and health of wildland species. Enclosed is a correspondence authored by James O Donnell, Executive Vice President of the Northwest Pine Association, which discusses these concerns in detail (Enclosure 2).

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DECISION CRITERIA

The decision criteria used by the Forest Service in recommending a proposed RARE II action are of the highest importance in the RARE II process. The final criteria chosen are the decision. They reflect the policy choices and value judgments the Forest Service will make in choosing between competing objectives or resource needs.

For this reason, the Forest Service must clearly display the decision criteria it chooses in the Final Environmental Statement and describe how the criteria were applied, nationally and regionally, to allocate areas to Wilderness, non-Wilderness, and future planning.

In this connection, NFPA recommends: (1) addition of one criterion to the list included in the DES, (2) classification of three criteria as "must" criteria, and (3) lesser weight for the remaining criteria.

Additional Criterion -- Wilderness "Demand"

The RARE II process is in some respects a "defensive" process. It was brought about by a series of challenges to Forest Service land management decisions to develop and utilize timber and other resources without further consideration of or recommendations for Wilderness designation of such lands. NFPA strongly recommends that the Forest Service take a careful and deliberative look at needs for formal Wilderness designation and weigh the various courses of action considered against an appraisal of these needs, as suggested elsewhere in these Comments. Strong consideration must be given to opportunities for meeting Wilderness needs from other public lands, as well as from the National Forest System.

Other decision criteria -- Wilderness characteristic goals and Wilderness attribute ratings -- tend to deal with the aspect of Wilderness "quality." But they are based on physical and biological characteristics of the areas and not on the human element of "demand." NFPA recommends that a separate criterion -- Wilderness demand -- be used to reorient the RARE II decision toward a more balanced multiple use decision based on a full appraisal of demands for all resource uses, including Wilderness, to go along with the present look at the opportunities for various resource uses.

Must Criteria

NFPA strongly recommends that the following proposed decision criteria be treated as overriding in development of the recommended action:

1. RPA Program Targets. The General Comments section of this response explains the essential link between the RARE II and RPA processes and discusses the importance of the 1975 RPA timber program targets in meeting present and future national needs for wood products. The only way these needs can be met is through an assurance that there is an adequate national forest commercial forest land base available to supply the prescribed levels of timber. This criterion can be defined specifically through the RPA base line which the Forest Service is developing and should be a paramount consideration in developing the final action.

2. Commodity Outputs Foregone -- Community Stability and Employment. In supporting this as a "must" criterion, NFPA urges that careful consideration be given to the manner in which it is applied. A July 14, 1978, memorandum (Everett Towle to Director of Recreation) included in the July 13, 1978, version of the Forest Service draft "Preliminary Evaluation Procedures -- RARE II," stresses community stability in terms of "orderly change." The Forest Service should not overlook the clear possibilities that as timber supply situations stabilize, some presently stable or declining communities are in a good position to stabilize or grow as increasing supplies and better market conditions occur.

Further, care should be taken to make evaluations of community stability based on input of local citizens, officials, and Forest Service personnel familiar with the locality. The Towle memorandum tends to depersonalize the determination, basing it on raw data rather than a balanced view of data and local social situations.

3. National Issues -- Housing Starts, Inflation. This "must" criterion relates to the RPA criterion, as the targets for timber and other resource commodities were developed to be responsive to national needs for adequate wood supplies to provide for housing and other wood uses at reasonable costs. Any major disruption of the Forest Service's ability to meet the RPA targets would have negative effects on resolution of these issues. These are the problems which led President Carter to request a number of cabinet officials to review ways to increase national forest wood supplies to offset the inflationary rise in wood product prices.

Other Criteria

NFPA recommends the following criteria be given lesser weight in the RARE II decision process.

1. General Public Agreement. The RARE II process came about because of a high level of controversy about the use of a large number of areas that are roadless. It is unreasonable to expect that these disagreements will evaporate. Where clear consensus exists regarding use of a particular area, obviously, this should be given considerable weight. But if considerable disagreement over an area exists, the Forest Service should forge through this controversy and make a decision. Lack of consensus should not be a reason to delay a decision or place an area in the future planning category.

2. Wilderness Characteristics -- Wilderness Attributes Ratings. These criteria measure the physical and biological attributes of the areas in the RARE II inventory. By themselves, however, they should not be given any particular weight. They may be useful for selecting the highest ranked areas from within the RARE II inventory, but are not useful in determining how much of the inventory should be allocated to Wilderness without consideration of Wilderness demand and needs for other resources. These criteria should give way to the "must" criteria discussed above.

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INDIVIDUAL ROADLESS AREAS

NFPA defers to individual companies and to regional industry associations with respect to individual area recommendations. These recommendations have been supplied to the Regional Foresters and are available as a part of the RARE II public-involvement process.

Boundary Adjustments

NFPA does, however, urge that in reviewing and dealing with local public and Regional Forester area-by-area recommendations, the Forest Service develop flexible means to handle boundary recommendations. The early RARE II process tended to treat the roadless area inventory on an "all or nothing" basis. Many conflicts may be resolved if there is a flexible way to handle adjustments as the final proposal is put together. Many in the forest products industry would like to be in a position to recommend boundary adjustments which would exclude from particular roadless areas those portions containing significant commercial forest land or which are needed for access to renewable resources, rather than recommending that the entire area be recommended as non-Wilderness to retain the availability of the timber in the area.

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NFPA RECOMMENDATIONS

Based on the general comments above and the detailed analysis that follows, NFPA recommends the following RARE II action be adopted by the Forest Service:

Non-Wilderness -- Timber

The Forest Service should not select any of the ten specific alternative approaches included in the DES, but should provide for an allocation of areas to non-Wilderness which:

- a. will assure the ability of each Forest Service region to meet assigned Resources Planning Act Program targets for timber resources; and
- b. reflect local recommendations regarding areas or portions of areas needed to maintain dependent industry or community stability.

Successful implementation of this action will depend heavily on the determination of the relationship of the RARE II roadless areas and RPA Program goals -- the "1975 RPA Acreage Baseline." NFPA strongly recommends that special care be taken to properly correlate the areas with all the National Forest System timber-related RPA targets and not just to potential yield, as is presently intended in the Forest Service draft "Preliminary Evaluation Procedures -- RARE II." The RPA baseline must be realistic for both present and long-term situations. The Forest Service must be able to state accurately just how RARE II area allocations will affect timber sales, programmed harvest levels, and potential yield levels in comparison with these activities as scheduled in the 1975 RPA Program. Use of potential yield alone will not accurately reflect the possible year-to-year levels of National Forest timber production. Also, consideration must be given to the actual constraints on timber management activities, including personnel and budget limitations and special environmental protection measures.

As indicated elsewhere, NFPA expects the RPA baseline will show that a major portion of the commercial forest land in the RARE II Roadless Area inventory will need to be allocated to non-Wilderness use, to be consistent with the assumptions regarding the National Forest System commercial forest land base included in the 1975 RPA Program.

Non-Wilderness -- Other Resources

Roadless Area allocations should also give priority to achievement of RPA goals for other non-Wilderness resources.

NFPA has not undertaken a detailed review of the RARE II inventory to evaluate the potential of the areas for non-Wilderness resources in addition to the timber resource. However, the same reasoning regarding development of the RPA Program and the Program's reliance on the other non-Wilderness resources in the inventory applies to these resources as it did to the timber resource. The 1975 RPA Program represents a balanced program. To keep the Program in balance, first call on RARE II areas should be given to meeting all RPA targets and not just to meeting Wilderness acreage goals.

Wilderness

After consideration of allocations needed to meet RPA Program targets for non-Wilderness resources, the Forest Service should allocate to Wilderness those roadless areas in the RARE II inventory which can make the highest quality contribution to the RPA.

Wilderness Goals

NFPA supports all the 1975 RPA Program goals, including those for allocation to Wilderness. That goal was 25-30 million acres. There are 14.8 million National Forest System acres now in the National Wilderness Preservation System and another 5.2 million acres pending before Congress. In addition to these 20 million National Forest System acres, there are several million acres under Wilderness study by the Forest Service at the direction of Congress, which are not included in the RARE II inventory. Along with these present and pending Wilderness designations, NFPA anticipates there will be substantial acreage available in the RARE II inventory, after allocations to non-Wilderness as suggested above, to easily meet, if not exceed, RPA Wilderness goals. NFPA recommends that the Forest Service use the Wilderness attribute and Wilderness characteristic ratings to make this allocation so that additions to the Wilderness System will be of the highest quality feasible.

Future Study

NFPA urges that the least possible acreage be allocated to future planning and that any such allocation be made after assurance that RPA non-Wilderness goals can be met.

The principal purpose of the RARE II process is to resolve uncertainties about availability of National Forest roadless areas for resource production. A future planning allocation only delays decision and continues this uncertainty. There will be some areas where inadequate information is available to clearly understand resource tradeoffs. But where such information is adequate, NFPA urges that decisions be made. Otherwise, the Forest Service will be masking the real effects of its decisions.

Future planning allocation does not provide for a firm enough commitment of an area to the resource base now to warrant counting on the availability of the resources involved in the future. Thus, present program levels, such as programmed timber harvest levels, must be hedged to anticipate the loss of the future planning acreage from the resource base.

Prompt Release of Areas Allocated to Non-Wilderness

NFPA urges that the Administration take immediate action at the time the FES is completed to release for management those areas determined to be suitable for non-Wilderness use. Such action should include Presidential or Secretarial direction to the Forest Service to undertake planning and management of released areas without further consideration of their potential designation as Wilderness.

The main objective of RARE II has been to eliminate the barriers of uncertainty and challenges to Forest Service management decisions to develop or use non-Wilderness resources. The RARE II FES will provide the foundation, as required by the National Environmental Policy Act, for decisions to move forward with management of the areas allocated to non-Wilderness without further consideration of potential Wilderness designation. This response describes elsewhere the importance of prompt resolution of the RARE II process to maintenance of dependent industries and the viability of hundreds of communities. Thus, prompt and clear direction should be given the Forest Service to bring the process to an end and permit resumption of regular planning and management activity.

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APPENDIX

DETAILED COMMENTS ON RARE II DES

These detailed comments reflect NFPA's view that the DES is an adequate basis for development of the final RARE II proposals and accompanying impact statement. Our comments are designed to strengthen the DES largely by identifying areas which could be recast to make all the procedures utilized and expertise applied by the Forest Service more apparent from the face of the document.

Chapter 2 -- Introduction

1. Review of statutory authority under which Forest Service operates. This discussion erroneously creates the impression that Wilderness is a predominant value in multiple use management of the national forests. This section should be recast to explain that Wilderness is just one of the uses for which the national forests are managed and that RARE II is an adjunct to the normal national forest multiple use planning process. It should be explained that RARE II was not required by the Wilderness Act, but responds to the need to study land for its Wilderness value under the National Forest Management Act of 1976 (NFMA)-- which lists Wilderness as one of the multiple uses.

One short paragraph (p. 2) is devoted to discussing the critically important requirements of the Forest and Rangeland Renewable Resources Planning Act (RPA). As discussed below, the RPA (as amended by NFMA) should be identified as the primary framework within which all national forest land management planning (including RARE II) must take place.

2. Objectives of RARE II. The DES should clearly state the objectives of RARE II. Based on public statements of Assistant Secretary Rupert Cutler and the Forest Service, these objectives are: (1) expedite completion of the National Forest Wilderness System within a framework which is consistent with other 1975 RPA Program output targets, (2) reduce the time frame for study of most inventoried roadless areas, and (3) expedite the release of areas which have a primary value for multiple use purposes other than Wilderness.

The DES should state that one of the results of the RARE II process will be to eliminate the need to give Wilderness further study during the normal land management planning process for those areas which are recommended for non-Wilderness use. If this is not the result of RARE II, its objectives cannot be met.

3. Potential contributions of other public agencies to the National Wilderness Preservation System (pp. 6-9). The data upon which the potential Wilderness contributions of the National Park Service, National Wildlife Refuge Service, Bureau of Land Management, and State and Local governments were based could be very useful and should be displayed in tabular form in the appendix. In addition to the description of existing and potential acreage additions to the National Wilderness Preservation System, the goals and objectives of such a system should be identified and analyzed. The FES should provide a good basis for evaluating how each of the RARE II alternatives relate to meeting the Forest Service's share of such demand (see discussion under chapter VI -- Evaluation and Development of a proposal).

4. Relationship of the National EIS to State and Regional Supplements. More explanation of the reasons for the two-tiered approach and a description of the material included in the Regional Supplements would be helpful. The contents of the Regional Supplements need to be more fully described so as to give the reader of the National EIS some idea of how detailed Forest Service consideration of the environmental impacts really has been.

Chapter II -- Affected Environment

1. Page 13, fourth full paragraph. An explanation of how and why the Forest Service combined Bailey's ecoregions and Kuchler's potential natural vegetation would be useful.

2. Page 15, first full paragraph. The importance of the national forests to the nation's softwood sawtimber supply should be discussed. The paragraph does state that in 1977 the national forests accounted for 10.5 billion board feet of a national timber harvest of about 66.2 billion board feet (or about 16 percent of the total wood harvested). However, the national forests account for about 27 percent of the annual harvest of softwood sawtimber essential for home building.

3. Page 15, second full paragraph. An explanation of the marginal timber component and the reasons for using it as the "maximum" potential that could be realized from the roadless areas would be beneficial.

4. Page 16, second full paragraph. The statement is made that the "presence of wildlife in Wilderness areas is an important part of a visitor's enjoyment" and that the 29 species selected are those "the public would like to see in a Wilderness setting". These statements are equally applicable to areas subject to non-Wilderness management. The FES should avoid creating an impression that wildlife enjoyment is a value unique to Wilderness designation. As pointed out below, Wilderness designation may actually reduce wildlife carrying capacity and the opportunity for the public to observe favored species.

5. Page 17, fifth full paragraph. The importance of 25 percent fund receipts to counties (most of which come from timber) should be discussed.

Chapter III and IV -- Evaluation Criteria and Alternatives Considered

The DES correctly notes that an almost "infinite number of possible alternative actions exist, so the task is one of narrowing them to a reasonable number for consideration" (p. 21). However, the FES would benefit from a more extensive discussion of "how" and "why" the Forest Service selected alternatives for evaluation. This discussion should focus on rationale and methodology for selecting the range of alternatives and the cutoff points used to generate the alternatives. The Forest Service should recount the role that professional expertise and long experience in national forest management played in these critical decisions. Such a discussion is valuable where a decision -- such as choice of cutoff points -- is not amenable to mathematically precise determination but rather is grounded on judgmental factors. In this connection, the Supreme Court has recently noted, however, that the NEPA obligation to consider alternative actions "must be bounded by some notion of feasibility." Vermont Yankee Nuclear Power Corp. v. NRDC, 46 U.S. L. W. 4301, 4309 (April 3, 1978).

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practices commonly applied on the national forests will result in a species diversity more similar to that in presettlement ecosystems than will Wilderness designation itself. This should be explained.

1. Landforms, page 34, second full paragraph. The statement that alternative B (all non-Wilderness) "will not preserve any (landform types) in a natural state" should be clarified. Forest management practices must utilize natural processes if they are to be successful. Effects of Wilderness versus non-Wilderness use will be different, but both kinds of uses will have definite impacts on ecosystems, landforms, vegetation, and wildlife.

Wilderness designation will not, in most cases, preserve the "natural" appearance of these landforms in terms of maintaining the composition and diversity of presettlement vegetation types. In most cases, Wilderness will mean a transition to vegetation types dominated by late successional (climax) species which in most parts of the country will be exceedingly "unnatural" (will not be as they were before white settlement). Vegetation cover will be much more uniform and many wildlife species will be reduced in numbers or will disappear.

2. Vegetation, page 35, fourth full paragraph. The statement that alternative J (all wilderness) will have the "maximum potential for preserving naturally functioning ecosystems and vegetation communities," should be clarified to reflect the comments above regarding maintenance of natural conditions in Wilderness.

3. Air, page 36 & 37. Discussion of the potential impact of Wilderness in connection with the Clean Air Act should acknowledge potential constraints on land management activities (i. e., prescribed burning) and industrial operations which affect air quality within a Wilderness or visibility from Wilderness. Many industrial activities, whether dependent on land based resources or not, will be affected by such designations.

The impacts which could result from Clean Air Act Class I designation of Wilderness areas under each alternative should be described in more detail than in the DES. The DES states that allocating maximum acreage to Wilderness "could lead states to establish special standards under the Class III provisions of the Clean Air Act". The rationale for this statement should be explained.

4. Recreation, page 37, second full paragraph. The statement that as areas "are allocated to non-Wilderness uses, there may be a corresponding increase in recreational use of existing wilderness" appears to conflict with the figures on page 39. These show a significant increase in dispersed non-motorized recreation under several alternatives which allocate significant acreage to non-Wilderness use. For example, alternative H (which would allocate 73 percent of roadless area acreage to non-Wilderness, 16 percent to Wilderness, and 11 percent to Wilderness study) would, over the long term, provide almost 5 million more recreation visitor days of dispersed non-motorized recreation than would alternative J, the all Wilderness alternative. Since demand for Wilderness recreation and demand for dispersed non-motorized recreation are very similar in composition, Forest Service figures appear to show that alternative H could in reality significantly reduce demand for Wilderness as compared to alternative J. Several other alternatives providing for significant non-Wilderness allocation would have a similar affect.

5. Page 37, last paragraph. The statement that "similar [significant] increases in [recreational use of] wilderness areas are not realistic as they have capacities that if exceeded, the attributes essential for a wilderness recreation experience disappear, e. g., solitude." This statement appears to assume that all existing Wilderness (including that likely to be designated Wilderness under all federal ownerships) is at or near carrying capacity. This is far from being the case.

In addition, the Forest Service should consider the potential for increasing the carrying capacity of existing Wilderness -- as an alternative to additional Wilderness designations -- through construction of more trails and trail heads to disperse use into areas not currently utilized. In this connection, it has been estimated that as much as 90 percent of current Wilderness use occurs on less than 20 percent of the Wilderness area.

6. Timber, page 41-43. Projected timber impacts of many of the alternatives appear to be understated -- although the extent to which this is true is unclear at this time. For example, the chart on page 42 is based on the assumption that all further planning areas will be allocated to non-Wilderness. The chart should reflect the more realistic assumption that some of the further planning areas will not be available for timber harvest.

Calculations of potential "long-term" effects on timber production (pages 41-42) assume full implementation of existing resource plans. The FES should address the problem of whether such an increased utilization of lands not selected for Wilderness is a realistic possibility, considering legal, political, and economic constraints.

7. Range, page 44. In addition to the table showing short- and long-term effects on grazing, the FES should acknowledge that national forest roadless areas are generally summer range -- which, in some areas, is in short supply. Loss of more summer range could result in a limitation on ranchers' production more important than mere animal unit months loss would imply.

8. Water, page 45. This section should discuss potential increases in water yield through vegetative manipulation which are foregone in Wilderness. The need for enhanced water yield through vegetative manipulation will likely become increasingly important in the arid West.

9. Wildlife and Fish, page 46, first full paragraph. The statement that preservation of wildlife habitat and the fisheries resource in its natural state will best be maximized in alternative J should be amended for the reasons stated earlier. The DES statement that the "rate of ecological progression will depend on the success of management in allowing forces such as fire to maintain a natural diversity of habitat" is a critically important factor whose full implications should be analyzed in the FES. The Wildlife Management Institute in its September 15, 1978 "Outdoor News Bulletin" stated:

"Totally protected wilderness habitat is not ideal for all wildlife species. Many types of animals require young plant communities that can be supplied only by the demise of mature plant associations. This can be done by "natural" wild fire, insects, disease, or wind, or, it can be done by man with timbercutting or prescribed fire. But "natural" reversions of

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plant communities are not dependable within reasonable time frames, and wilderness designation prohibits timbering and the use of mechanization necessary to use prescribed fire. Therefore, wilderness status perpetuates mature plant communities and a narrow spectrum of wildlife. That is not to say that no wilderness should be designated. It should be. The point that wildlife conservationists are trying to make is that each area should be studied and a decision made as to whether the resource values warrant restricted management that wilderness designation necessarily requires."

It is unlikely that use of fire to manage for optimum wildlife habitat will be available as a management tool under Wilderness designation of most RARE II areas, particularly in view of current Forest Service policy which prohibits prescribed burning in Wilderness.

10. Page 46, second full paragraph. Here again the statement that non-Wilderness will be adverse to maintaining "natural" habitat is confusing and misleading in its implications. The vast majority of wildlife species depend on early successional plant communities which will be adversely affected over the long term by Wilderness designation.

11. Page 47. The chart shows significant long-term benefits to wildlife and fish recreational use from non-Wilderness allocation of RARE II areas. This results from increased access opportunities under non-Wilderness conditions. In light of these data, the Forest Service should reconsider whether it can accomplish the Wilderness goal (DES, p. 25) to "provide a reasonable opportunity" for viewing the wildlife species listed in Appendix C through imposition of no-management regimes in areas allocated to Wilderness.

12. Minerals and Energy, page 47. The chart lists only producing and known sites for oil, gas, and critical minerals. The Forest Service should discuss in the FES the impact of Wilderness on projected, but as yet undiscovered, oil, gas, and mineral deposits in the RARE II areas.

13. Resources Planning Act (RPA), page 49. Only one chart and less than one page in a 112 page document is devoted to describing the impact of RARE II alternatives on the 1975 RPA Program goals. The Forest Service should devote much more attention to this critically important relationship. The chart at page 50 indicates that RPA targets can be met for timber under all but the maximum Wilderness alternative. However, the recently published "Roadless Area Tradeoffs Study" leads to the inevitable conclusion that projected impacts of Wilderness designation on timber production is understated in the DES. In addition, the 1975 RPA goals assumed most commercial forest land in the roadless areas would eventually come under multiple use management. This assumption is not, obviously, realized in all of the alternatives. NFPA understands the Forest Service is reanalyzing the RARE II/RPA relationships and strongly supports that effort.

14. Economics, page 51. The discussion of economic impacts on pages 51, 52, and in Appendix E relies on an input/output model for local and regional areas. This discussion should be expanded and particularized to aid understanding of the economic impacts of Wilderness allocation.

The DES, again, optimistically assumes that existing management plans will be fully implemented on lands not selected for Wilderness. This assumption leads to the incorrect conclusion that any alternative except for J will produce significant output and employment gains in the long run.

The employment impact of Alternative J should be recalculated as follows: Alternative J shows a job loss of 20,404 if the "all Wilderness" option is chosen. Alternative B shows a potential job gain of 97,550 if all the RARE II lands are managed at full potential. Thus, the economic cost of choosing the "all Wilderness" alternative is not only a loss of 20,404 jobs but the opportunity forgone of creating another 97,550 jobs, so the real impact of "all Wilderness" is 117,954 jobs.

15. Housing starts, inflation, and balance of payments, pages 53-54. NFPA suggests that these sections be expanded to help the reader better understand the relative effects of RARE II alternatives on housing starts, inflation or balance of payments, and should indicate the relative effect of each alternative on each parameter.

16. Land acquisition, page 55. This section should discuss in more detail how much private land is involved in each of the alternatives evaluated. The FES should include: (1) landownership by ownership type, i.e. other federal, state, industrial private, and nonindustrial private, (2) the cost of reasonably anticipated acquisition of private inholdings, (3) the loss of resource values resulting from Wilderness type management of intermingled private lands not acquired. The FES should recognize that, in many cases, private lands will need to be acquired at considerable public expense if roadless areas are designated as Wilderness. In addition, the impacts created by resource use restrictions on private lands, whether or not they are acquired, should also be evaluated. Experience with the recent Alpine Lakes legislation has shown clearly that the problem of intermingled private ownerships is a major one, and will result in major expense to the public if areas intermingled with significant private ownerships are designated as Wilderness.

17. Social, page 56. The DES should discuss the readily available data covering a profile of the typical Wilderness user. Surveys show that the typical Wilderness user is young, less than 30 years old, unmarried, and of above average income and educational levels. Since Wilderness is provided free to the public, a discussion of such statistics is useful to show who gains and who loses through Wilderness designation.

18. Population, page 56, third paragraph. The Forest Service should reconsider its apparent conclusion that retirees who move to rural areas are best served through Wilderness allocation. Very few retirees, in fact, recreate in Wilderness. This group is best served through developed recreational services.

19. Recreation use patterns, page 57, second full paragraph: "Wilderness experiences would be enhanced through the reduction in user densities resulting from increased Wilderness designation." User densities could also be reduced through more construction of trails and trail heads in existing Wilderness. A third way to reduce densities would be to reduce demand for Wilderness by providing more dispersed non-motorized recreation opportunities in non-Wilderness settings. The discussion under Recreation describes the large

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potential for increasing the supply of dispersed non-motorized recreation through alternatives which allocate significant areas to non-Wilderness.

20. Public Sentiment, page 59, second full paragraph. The DES states that local residents favor the status quo which "would keep roadless areas in their present undeveloped state" and that, therefore, "both Wilderness proposals and non-Wilderness allocations have a negative impact on the sense of local control". The Forest Service should consider the fact that the local public has a strong voice in the development of land use plans of adjacent national forests. If the local public desires undeveloped status for non-Wilderness areas it has an opportunity to make its views known during the public input on the development of these local national forest plans. Local residents have no control over management of areas once they are designated as Wilderness.

NATIONAL LUMBER AND BUILDING



MATERIAL DEALERS ASSOCIATION

September 29, 1978

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Room 3008, South Agriculture Bldg.
12th & Independence Ave., SW
Washington, D.C. 20250

Dear John:

I am enclosing (5) copies of NLBMDA's comments regarding Environmental Impact Statement on RARE II. We commend you and your staff for pulling together a monumental piece of work in an effort to resolve a problem that is of major national concern.

As you will note, we support Alternative B because, in short, we simply do not believe there is a need to add more national forest lands to wilderness. However, we supported the Resources Planning Act, and the Forest Management Act, because we believe those two laws provided the mechanism to properly allocate our forest lands for the benefit of all users. If, as another alternative, the criterion in the Resources Planning Act was followed as recommended, thus assuring a balance in land and resource use, we would support that approach as well.

We will look forward to a speedy completion of the RARE II Study, and then to necessary congressional action to provide an equitable solution to the use of our national forests.

Best regards.

Sincerely,

Richard D. Snyder, CAE
Executive Vice President

RDS/sr
enclosures
cc: Forest Service Office
Eastern Region (B-9)
633 West Wisconsin Ave
Milwaukee, WI 53203

priced out of the housing market by increased costs, whatever the cause, including inflation. He arranges credit for material buyers (and may extend credit) when families want to repair or renovate older homes. For example, the dealer can almost instantly sense in his business the effect of a 1% increase in the home mortgage rate.

From years of experience, the dealer has learned to read the lumber supply and demand signs. When the Federal government's Federal Forest policies either increase or decrease the stumpage placed on the market, the experienced dealer, reading his local market demand signs and the mortgage money rate signs, makes his purchasing decisions. In fact, his success as a businessman in many ways is dependent on how well he "reads" those signs. He knows, for example, that such Federal actions materially affect private timber owners decisions and thus affect the total lumber market, including imports.

Since for many consumers and lumber users the dealer is the only point of contact with the lumber industry, it is not surprising that the dealer is often blamed for scarcities and price trends over which he has no control. This only serves to reinforce his concern about governmental policies - current or prospective - which may adversely affect lumber supply.

Relations of Federal Timber Policies to Lumber Supplies, Prices and Housing

About half the lumber consumed in the U.S. goes to housing. Therefore, there is a close correlation between housing starts, lumber production and imports. (For 1970-1977 data see Charts 1 and 2 attached.)

It follows that the prices bid by lumber mills for stumpage in National Forests reflect similar trends with a time lag due to the timber bidding mechanisms and delays in installing roads and carrying out logging processes. (See Chart 3.)

Significant, however, for our purposes here, is the fact that stumpage prices have reflected an upward bias and failed to subside to the same relative degree that housing starts fell during the 1970-77 period. The reasons for such inflationary bias are rooted in Federal timber policies.

As is illustrated by the enclosed graphs, the upward trend in both stumpage and lumber prices cannot be attributed solely to rising demand or to inflation. Rather, the declining supply of raw material (i.e. stumpage) in both absolute and relative terms in an auction market results in rising prices as lumber mills bid against each other for the shrinking supply.

An examination of Charts 1 through 3 reveals:

- a) Stumpage costs rose relatively far more than housing starts in the early 1970's period.
- b) Stumpage costs did not decline at nearly the rate of housing starts when those starts dropped abruptly from the 2.3 million annual level to less than half that figure in 1975 (1.1 million).
- c) Stumpage costs for Douglas Fir (a Western species used extensively in housing) rose dramatically, far exceeding other species in the period 1974 to the present. Federal Forests are major sources for Douglas Fir.
- d) Charts 4 and 5 report lumber prices (as distinct from stumpage prices) and as compared to construction materials as a whole. Again, the species of timber with origins in Federal Forests (Douglas Fir) shows the highest price increases. Southern Pine, while not generally originating in Federal Forests, is a competitive product, therefore reflects a somewhat similar price trend.
- e) Significant also is the extent to which, as shown in Chart 4, softwood lumber products exceed the wholesale prices of construction

The inflationary consequences of further reductions in timber harvested from Federal Forests on the cost of housing construction are self-evident. The Forest Service and the Congress should not fail to consider such factors in the discharge of their public interest responsibilities.

Timber Supply Now Critical - Most RARE II Proposals Would Make It Worse

On the whole, as the data in Charts 1-5 indicate, and as the Council on Wage and Price Stability Report on October 1977 clearly points out, the lumber supply and price problem facing this nation is already of a critical nature without such drastic actions as are contemplated by the Forest Service under most of the Alternatives proposed under RARE II.

We contend the Forest Service should make no recommendations to Congress which further unduly restrict the ability of the public to enjoy the benefits of lumber and wood products from our Federal Forests; nor should actions be taken which knowingly and materially increase the costs of housing our nation's families.

Congress should not be lulled into a false assumption that the public will not be disadvantaged or will not have to pay in the form of higher housing costs and more inflation for the setting aside of vast timber tracts as Wilderness. Further, the true meaning of Wilderness should be made clear to the public and Congress by the Forest Service; facilities and opportunities for public recreation in such areas cannot and should not be compared to those available to the public in Yellowstone Park or Yosemite National Park.

In summary, our Association maintains that:

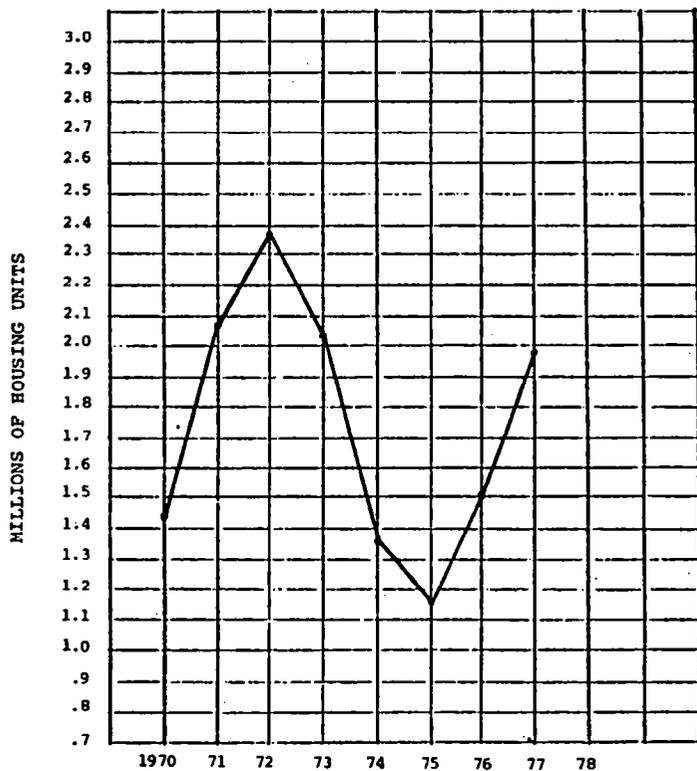
- More, not less, timber is needed from Federal Forests for housing our nation's families and for other wood fiber uses.
- More, not less, timber could be supplied by the Federal Forests

without disturbing multiple uses or destroying the sustained yield principle.

- Reduced Federal timber sales and the prospect of even less Federal timber has caused drastic price increases in stumpage; in partial response, lumber product prices have likewise increased.
- Congress passed the Resources Planning Act (RPA); the Forest Service operates under that act and under the National Forest Management Act of 1976. RPA provides for certain timber targets. Actions recommended by the Forest Service as a result of RARE II should be consistent with and responsive to those RPA targets.
- The present Wilderness System of 16.6 million acres is already substantial, being equivalent to the areas of three states - Massachusetts, New Hampshire and Vermont. The areas under study are certainly excessively large - as are the Wilderness proposals under most of the RARE II Alternatives.
- If the government as a consequence of RARE II were to place large roadless areas aside for further consideration, the effect would be most undesirable. It would further prolong the uncertainties as to how much timber may be removed from the use of America's families. In turn this would further contribute to inflation in lumber prices.
- Estimates of RARE II-caused employment losses have been substantial. Such job losses could be critical to some smaller communities wholly dependent on timber extraction or processing.

Chart #1

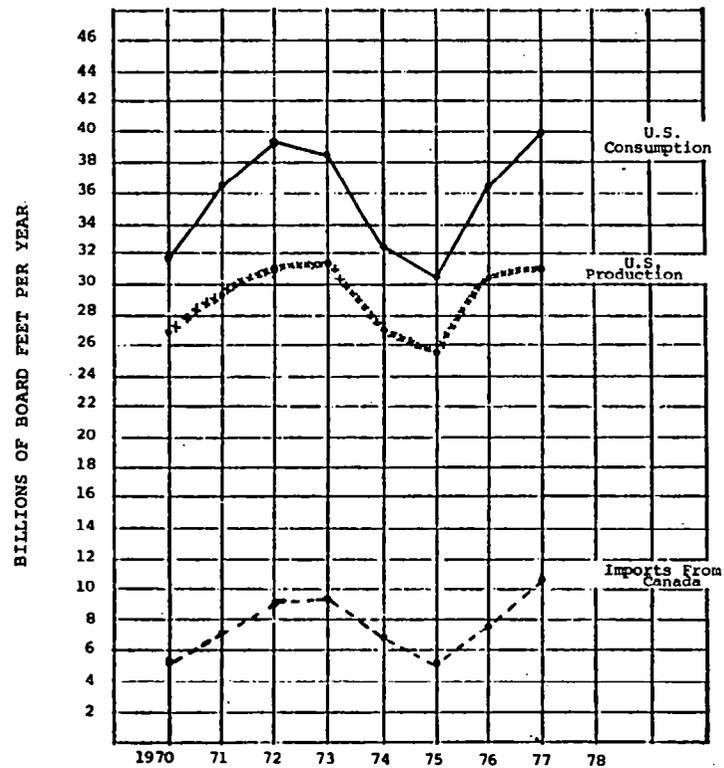
TOTAL U.S. PRIVATE &
PUBLIC HOUSING STARTS
1970 - 1977



SOURCE: Bureau of Census, U.S. Department of Commerce

Chart #2

U.S. SOFTWOOD LUMBER PRODUCTION,
DOMESTIC CONSUMPTION &
IMPORTS FROM CANADA
1970 - 1977

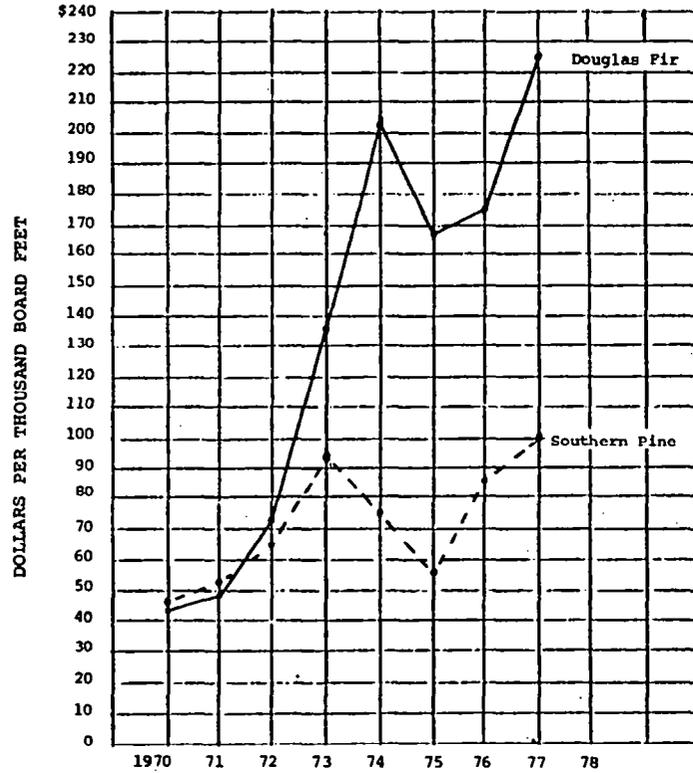


SOURCES: National Forest Products Association
Western Wood Products Association

Chart #3

AVERAGE STUMPAGE PRICES
FOR SAWTIMBER FROM
NATIONAL FORESTS

1970 - 1977

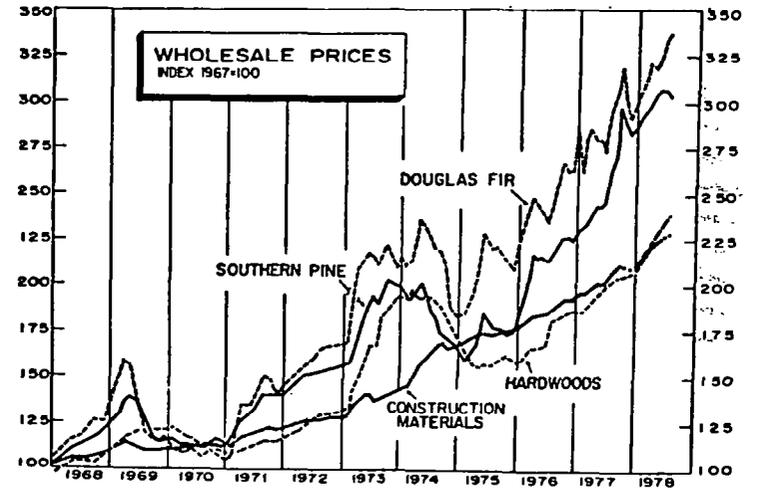


SOURCE: Forest Service, U.S. Department of Agriculture

Chart #4

LUMBER PRICES

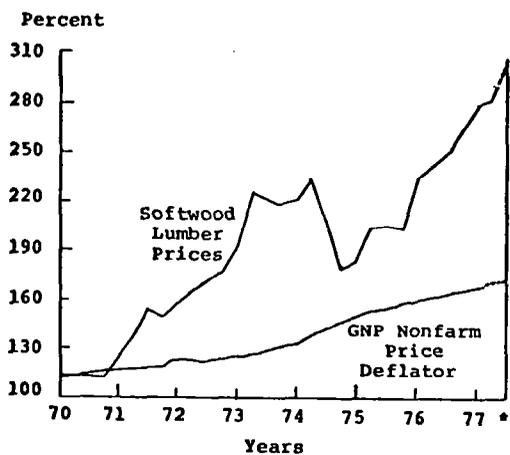
1969 - 1978



SOURCE: Bureau of Labor Statistics,
Department of Labor

Chart #5

WHOLESALE PRICE INDEX FOR SOFTWOOD LUMBER VS.
THE GNP PRICE DEFLATOR - PRIVATE NONFARM SECTOR



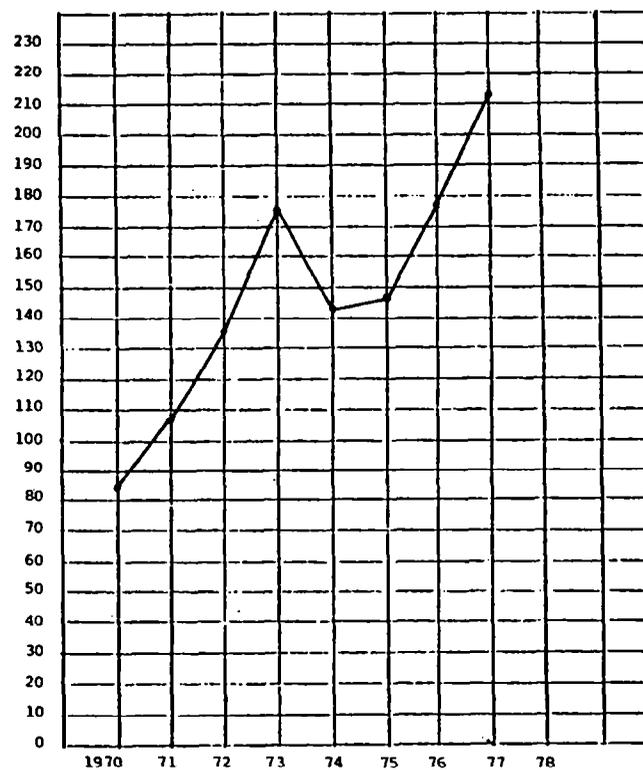
* 1977:3 GNP nonfarm deflator is estimated.

SOURCE: U.S. Department of Labor,
Bureau of Labor Statistics.

Chart #6

REPORTED PRICES*
-DOUGLAS FIR 2 x 4's
KD STD & BETTER 8' to 20'
FOB MILL

1970 - 1977



SOURCE: Random Lengths 1977 Yearbook

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National Wildlife Federation

1412 16TH ST., N.W., WASHINGTON, D.C. 20036

Phone: 202-797-6800



National Wildlife Federation

1412 16TH ST., N.W., WASHINGTON, D.C. 20036

Phone: 202-797-6800

September 29, 1978

September 29, 1978

COMMENTS OF THE NATIONAL WILDLIFE FEDERATION
ON THE DRAFT ENVIRONMENTAL STATEMENT
FOR THE SECOND ROADLESS AREA REVIEW
AND EVALUATION (RARE II) OF THE U.S. FOREST SERVICE

Mr. Steve Yurich
Regional Forester
U.S. Forest Service-Region 9
Clark Building
633 W. Wisconsin Avenue
Milwaukee, Wisconsin 53203

Dear Mr. Yurich:

Enclosed is a copy of our comments on the "programmatic" RARE II statement. Our original is being submitted to the Washington office.

We hope that you can give these your personal attention and that they may be of some use to you in formulating your proposals for the Chief.

Sincerely,

Peter Kirby

Peter C. Kirby
Counsel

PCK:srb

Enclosure

The National Wildlife Federation welcomes this opportunity to comment on the Draft Environmental Statement (DES) for RARE II. This process provides a promising opportunity for the Forest Service and the American people to take a comprehensive look at what part the remaining 62 million acres of roadless and undeveloped National Forest land should occupy in the National Wilderness Preservation System. Whether RARE II will, in the end, be judged a success will depend upon our having a realistic and modest expectation of what can fairly be accomplished in this accelerated land-use planning effort. It would be a mistake, we believe, to expect to resolve all or most of the complicated and difficult questions of the future of National Forest wilderness in a single undertaking; RARE II, however, can allow for the allocation of a significant portion of the acreage into either wilderness or development uses, with a substantial remainder to be studied further.

The National Wildlife Federation is a non-profit conservation education organization with headquarters in Washington, D.C. It has over four million members and supporters, with affiliated groups in all fifty states, Guam, Puerto Rico and the Virgin Islands. These individuals and groups engage in a wide variety of activities

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National Wildlife Federation
RARE II Comments

public did not have the benefit of the relative economic ratings of roadless areas developed through the "Development Opportunity Rating System" (DORS) and made available in mid-September. Returning substantial areas to further planning would, in sum, be consistent with the original intent of RARE II to reach consensus on as many areas as possible concerning their allocation to either wilderness or development and to return to further planning those areas on which further analysis of trade-offs should be done for making sound recommendations.

I. PROPOSED DECISION CRITERIA

A. RPA Program Goals. The first decision criterion proposed by the Forest Service is that 1975 RPA program targets will be "a major consideration" in the allocation of roadless areas and the development of a final decision. In general, the National Wildlife Federation supports the Resources Planning Act (RPA) as providing a sound approach to establishing goals and budget levels. However, in these circumstances we strongly counsel the Forest Service against inflexible adherence to RPA targets, particularly at the regional level.

The Forest Service had to prepare the 1975 RPA Program to meet an early deadline under the RPA, passed in 1974. These goals are to guide the operation of the Forest System and are, as RPA envisions, a major "consideration" in decisionmaking. As the term, "consideration", implies, these goals are not to be inflexible determinants. Allocations should not be governed by 1975 goals that have been found to

National Wildlife Federation
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be unrealistic. The Forest Service is no doubt coordinating RARE II as closely as possible with the 1980 review and update of the Assessment and Program so that the RPA targets are current and realistic. Further reason for caution about RPA targets as determinants is that the 1975 Program did not make allocations of outputs to roadless areas as such, thus bringing in a great deal of judgment now in attributing percentages of RPA goals to roadless areas. Finally, President Carter has not submitted a Statement of Policy to Congress, as authorized by Section 8(a) of the RPA, 16 U.S.C. §1606(a), about the extent to which this Administration adopts the 1975 Program as its policy. In our view, the Administration's "nonpolicy" on RPA goals further affirms the latitude the Forest Service should exercise in applying RPA goals flexibly and realistically.

From the above discussion, we would draw two conclusions pertinent to RARE II. The first recommendation, as noted, is that the decisionmaking, particularly at the regional level, be structured to allow for departures from 1975 Program targets. Shortfalls should be quantified, if possible, and explained. Our second recommendation, related to the first, is that the Forest Service should not consider itself bound by the 1975 target for wilderness. This target is set for between 25 and 30 million acres (DES at 50), but the Forest Service data shows that a greater amount could go into wilderness while still providing commodity

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for returning substantial acreage to further planning for this reason.

Another drawback is the use of total potential timber yield for given roadless areas in the determination of allocations. DES at 22. (Four million board feet annually in the West, two million board feet in the East.) This approach, also used for grazing and recreation losses, discriminates against larger roadless areas, and not necessarily in a rational way. There may be a number of smaller areas with high productivity per acre which together may represent more timber resource forgone than a larger roadless area equal in size to the total of the smaller ones, with less productivity per acre. Yet by the DES standard the larger area may be allocated to development. If there is to be a preference against larger areas as such, it should be an express standard, not an indirect bias against "total" productivity. Also of concern is that the proposed discrimination against larger areas on the resource score appears to run counter to the desirable preference for larger areas on other measures. On landform representation, for instance, the Forest Service states a definite need for "substantial acreage" in the examples selected. DES at 24. Similarly with wilderness-associated wildlife, some of the species, like grizzly bear, depend on the undisturbed solitude found in the larger areas. Because we support these additional characteristics for their value in "rounding out" the wilderness system, we are concerned that the discrimination

National Wildlife Federation
RARE II Comments

against large areas in the resource measure will adversely affect the availability of large areas for meeting the landform and wildlife features. We recommend that the Forest Service use some per-acre measure of timber and grazing productivity instead of the proposed approach of total productivity.

Another related standard proposed for use is that wilderness allocations will not be made which will have a significant adverse impact on community stability or employment. Special concern for local efforts is, of course, essential if RARE II is to reach an acceptable accommodation of the conflicting demands on the roadless areas. As with the criterion of resource potential, our primary concern is that this other standard be used in an informed, uniform and accountable manner. Our concern is heightened because of Alternative H which allocates areas on the basis of "local and regional issues" as perceived by the Regional Forester. This is an approach which largely incorporates the judgment about roadless areas and community stability and employment. Under this Alternative a relatively low percentage of areas (11%) would go into wilderness and an even lower percentage (5%) into further planning. DES at 32. (The amount in acreage is 16% and 11% respectively.) The Regional Foresters will play a critical role in formulating final proposals for consideration by the Chief, Assistant Secretary and Secretary. This Alternative, then, provides an important indication of what may lie ahead in the exercise of the "local need" standard. In

National Wildlife Federation
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value of RARE II may be the identification of these national needs and the achievement of them in a comprehensive and coordinated undertaking. Planning for a wide representation of landforms, for instance, might be very difficult to carry out in the many individual studies of individual forests. Significant weight should be attached to these factors. It may not be as immediately appealing to prefer an area filling an "ecosystem" gap to an area with a higher WARS rating, but such preferences are often justified. As with endangered species, we need to preserve a wide diversity of natural areas for our own genetic and scientific good. As Aldo Leopold put it, "The first rule of intelligent tinkering is to save all the pieces". So too the goal of accessibility and distribution ought to be weighed significantly in this national review because it may be difficult to take it into account in individual forest planning.

Finally, we wish to express support particularly for the use of the characteristic of wilderness-associated wildlife. There are a number of reasons for according significant weight to this factor. Congress recognized in the Wilderness Act that certain areas should be set aside not only for their preservation and protection as wild areas but also for "the use and enjoyment [by] the American people" of their wilderness character. 16 U.S.C. §1131(a). Much like features of scenic value, the presence of wilderness-associated wildlife is traditionally looked to as one of the measures of a wilderness experience. It is fitting that one of the goals sought in "rounding out" the wilderness system should be an ample representation of those species. Recognizing that individual expectations will

National Wildlife Federation
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vary widely, we would agree that RARE II has identified many of the classic types associated with wilderness, such as the loon, the wolf and the mountain goat. Providing a high level of representation of these species will enhance the public's appreciation of wildlife as an important element of wilderness, both for the visitors who experience them and for much of the public that takes pleasure knowing that they are there.

Left unexplored by the DES, however, is how the weight of this factor should be judged in relation to the effect of wilderness designation upon the species themselves. For some of the species, like wolf and marten which depend on undisturbed areas or old growth, the preservation of wilderness will generally benefit the animal itself. However, as the DES admits (p. 25), some of the species, elk being a good example, are not biologically dependent on wilderness. If it is necessary to devise priorities among species for meeting the wildlife "gaps" in the system, we would urge a preference for representing the more wilderness-dependent species since their welfare would be more directly benefited as a result.

While in no way diminishing our support for the wildlife criterion, we would like to share two other concerns. As we look at the listed gaps for the two levels of representation, DES at 90-91, we see that there are often far many more potential areas than are needed to achieve even the higher Level II. (The Level II gap for lynx is 7 and the potential areas number 309; for mountain goat the

National Wildlife Federation
RARE II Comments

respective figures are 18 and 341.) Given these figures the question arises why RARE II did not formulate a "Level III", with higher representations, such as presence in 75 units for widely distributed species. RARE II did formulate a Level III for ecosystem and accessibility and distribution. DES at 26. Why was the wildlife criterion treated differently? As noted, the DES figures suggest a higher level would be feasible.

Our next concern, which may provide the explanation for the limit to two levels, involves the relationship of the wildlife goal to the other three goals. Criteria such as ecosystem representation and accessibility ordinarily require that areas be widely distributed. For some of the wildlife species, however, such as grizzly bear, a high level of representation may mean that certain localized areas, where the species has a limited range, are favored for designation. We wonder if the four criteria may thus be somewhat at odds, three favoring distribution of wilderness areas and one weighing towards geographical clusters. In making this inquiry, we note from the DES that the Forest Service has apparently sought to assign the "gaps" for each species to as many regions as possible. As mentioned, we support all four criteria and hope that this listing suggests that conflicts have been minimized.

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II. ALTERNATIVES

A. Allocations. Many of the comments we have seen and heard from organized conservation groups and private individuals are sharply critical of the range of alternatives in the DES as being heavily slanted towards non-wilderness use. The statistics bear out this impression: for the seven realistic alternatives in the DES, on the average 76% of the roadless areas are allocated for non-wilderness while only 17% are proposed for wilderness. It is unfortunate that the alternatives generated by the Forest Service achieved this distribution. While the public is encouraged to draw up new alternatives, there is normally a tendency by readers to select from among the choices displayed or within the ranges proposed. Forest Service officials concede that the alternatives are weighed in favor of development uses but note repeatedly that their final choice is not restricted to outcomes from the displayed alternatives. Whether this is so or not, it remains the case that public comment will have been greatly influenced by the slanted range of alternatives. And since public comment about alternatives will be figured into the final decision, it appears to us that there will have been a real impact from the DES range, even if the Forest Service considers itself not bound by them.

As noted in our introductory remarks, the logical next step in RARE II would be to issue a revised DES with the preferred alternative identified along with the other alternatives which will realistically be considered. This will allow for more focused

National Wildlife Federation
RARE II Comments

public comment on the proposed course of action in the setting, we would hope, for a more balanced set of alternatives. Of benefit, for example, would be an alternative on the minimum amount of acreage needed to meet the RPA goals for the roadless areas. The Federal Register notice of September 13th indicated that such data is being developed and will be released when complete. These figures, on a regional and national level, would not necessarily represent a desirable level for the total amount allocated to non-wilderness use. However, an alternative based on these figures could provide a useful starting point for public comments on how much wilderness could reasonably be expected without the sacrifice of commodity goals.

As for our own view, we would be in a much better position to endorse a concrete alternative if there were a revised DES of the type suggested. In these comments, we cannot endorse any of the particular alternatives set forth. Our preference, as we explained at the outset, is for a sorting out of the clear and agreed allocations for wilderness or for development with a substantial amount, perhaps even up to 50 or 60% of the roadless acreages returned to further planning. As we also said at the outset, given realistic and modest expectations of what can fairly be achieved in this accelerated effort, RARE II can still be judged a success with such an outcome. Despite the commitment of much land to further planning, there would have been a resolution

National Wildlife Federation
RARE II Comments

of conflict over a significant amount of roadless area. Not only does this resolution come more rapidly, in advance of the forest planning not required to finish until 1985, but this resolution will have been reached in a national review of what the wilderness system should contain, rather than exclusively in individual forest planning.

B. Impacts. We have already discussed the need for more cost/benefit analysis of the wilderness versus development options. There is additional data which we should be developed or disclosed to allow for a better evaluation of impacts.

With respect to economic impacts, the summary tables which compare the outputs and effects of alternatives, DES at 61-64, base the long term levels of outputs upon the full implementation of resource management plans. This data is designed to show the high potential of outputs that can be realized from the roadless area resources. A necessary assumption of these calculations, we would presume, is that the Forest Service will be receiving full budgeting at the RPA levels in order to implement these plans. We would strongly urge the Forest Service to develop a similar table based on some assumption of underfunding of its budget requests. The Forest Service has traditionally been funding at lesser amounts than it considered necessary to meet potential goals. Under RPA, most recently, the agency has been receiving about 85% of the levels



SIERRA CLUB 530 Bush Street San Francisco, California 94108 (415) 981-8634

September 29, 1978

John R. McGuire,
Chief
U.S. Forest Service,
U.S. Department of Agriculture
P.O. Box 2417
Washington, D.C. 20013

Dear Mr. McGuire:

Enclosed are the comments of the Sierra Club on the "RARE II: Draft Environmental Impact Statement on the Roadless Area Review and Evaluation."

Sincerely,

Gege Coan,

Assistant Conservation Director

COMMENTS OF THE
SIERRA CLUB
AND THE
NATURAL RESOURCES DEFENSE COUNCIL, INC.

ON THE
UNITED STATES DEPARTMENT OF AGRICULTURE, FOREST SERVICE'S
DRAFT ENVIRONMENTAL STATEMENT
ON THE
ROADLESS AREA REVIEW AND EVALUATION (RARE II)

September 29, 1978

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COMMENTS OF THE SIERRA CLUB AND THE
NATURAL RESOURCES DEFENSE COUNCIL, INC.
ON THE ROADLESS AREA REVIEW & EVALUATION (RARE II)
DRAFT ENVIRONMENTAL STATEMENT

These comments are submitted on behalf of the Sierra Club and the Natural Resources Defense Council, Inc. (NRDC). The Sierra Club, whose principal office is at 530 Bush Street, San Francisco, California 94108, and which has additional offices in Seattle, Washington; Anchorage, Alaska; Sacramento, Arcata and Los Angeles, California; Santa Fe, New Mexico; Madison, Wisconsin; New York, New York; Washington, D. C.; and Lander, Wyoming, has a membership of approximately 180,000 persons. The Natural Resources Defense Council, with offices in Washington, D. C., New York City, and Palo Alto, California, has a membership of over 40,000 persons. Both organizations are actively involved in efforts to improve management of the nation's natural resources.

The Sierra Club and Natural Resources Defense Council, Inc. believe that the Draft Environmental Statement prepared by the Forest Service on the Roadless Area Review and Evaluation (RARE II) does not meet the requirements of the National Environmental Policy Act. The Statement (hereinafter "DEIS") is legally inadequate in many important respects, including its failure to present a reasonable range of alternatives, its failure to thoroughly and objectively evaluate the impacts of the alternatives presented, and its failure to explain the underlying justifications and premises of RARE II in order to permit understanding of the program by both

the public and interested governmental decision-makers. Additional flaws in the RARE II process are the inadequacy of the data used in the preparation of the alternatives. Furthermore, the methodology used is at best illogical and at worst seriously biased.

In these and other aspects, the DEIS is seriously deficient and provides a basis only for further Forest Service action toward implementing RARE II in the most limited fashion -- i.e., only those areas on which overwhelming evidence and almost total consensus exist can be allocated to the wilderness or non-wilderness categories based on the weak analysis of this document. All other areas should go in the Further Planning Category. Unless this limited route is taken, the Sierra Club and NRDC urge the Forest Service to improve, correct, and re-issue the Draft EIS, in order that both the government and the public can understand and respond to the proposed action intelligently before important decisions are made.

In order to fully understand how the RARE II program has failed so seriously to fulfill its goals, it is important to review its original intent. In his Message on the Environment to Congress on May 23, 1977, President Jimmy Carter said:

"When the Congress passed the Wilderness Act in 1964, it established a landmark of American conservation policy. The National Wilderness Preservation System created by this Act must be expanded promptly, before the most deserving areas of federal land are opened to other uses and lost to wilderness forever."

In his testimony in support of the Endangered American Wilderness Act, the Assistant Agriculture Secretary M. Rupert Cutler said:

"The nation's wilderness has, indeed, become a vanishing resource, and much of it is vulnerable to loss. The Carter Administration has committed itself to provide protection for these lands within the Wilderness System. This department will pursue that goal with a new sense of urgency."

To carry out this commitment, Dr. Cutler told the congressional committee:

"... we are going to take another complete look at the roadless and undeveloped lands in the entire National Forest System. We intend to categorize these undeveloped lands into three types One category will be areas which will become wilderness immediately. The second will be areas which need more study before the Congress can make its decisions as to whether or not to designate wilderness. The third category will be the remaining areas which require no further consideration as wilderness and thus would be devoted to other than wilderness uses." (Statement to H. Subcom. on Indian Affairs & Publ. Lands, H. Int. Comm., May 6, 1977.)

RARE II was intended to be a comprehensive program to completely re-examine the roadless area/wilderness question. It was to assemble a rigorous data base covering the tradeoffs and opportunity costs of each roadless area. It was to be a refinement of and improvement over the RARE I process. It was to proceed without preconceived notions, to avoid confrontation, to provide the public with useful data, and to achieve a consensus in allocating some of the roadless areas evaluated.

The Forest Service declared that all roadless areas would fall into one of three categories:

"(1) Those that should be recommended to Congress for wilderness designation; (2) those that should be managed for nonwilderness use; and (3) those on which decisions should be deferred to allow additional planning for all options. The last category will include areas on which available data are insufficient, or on which further analysis of tradeoffs must be made to draw sound conclusions, or on which a reasonable consensus cannot be reached." (Emphasis added.) "RARE II: A Quest for Balance in Public Land Use," FS-320 Pamphlet (May, 1978). See also, 42 Fed. Reg. 59688 (Nov. 18, 1977); 124 Cong. Rec. S. 5957 (April 19, 1978).

The role of the environmental impact statement in this process is to present the decision-makers and the public with a

thorough, unbiased assessment of the options available to the government in making choices from among a reasonable set of alternatives. Thus, the DEIS and the process itself should include an array of feasible alternatives and adequately assess the environmental impacts of these options. An impact statement should not be conclusory and should represent a good faith attempt to include all relevant alternatives. Data of sufficient quality and detail to effectively evaluate the options must be acquired and utilized.

There are three basic failings in the RARE II program as presented in the DEIS:

(1) The results of the program are to a large extent dictated and dominated by unexplained structure and methodology, and by arbitrary threshold values. Targets, percentiles, and numerical cutoff levels are presented as faits accomplis, without any explanation of their origin, the rationale for their use, or discussion of alternative systems. This prevents meaningful public input on the basis of the program. While the Forest Service does ask for comments on some of the procedures and standards used, there are many implicit decisions buried deep in the process, remote from public scrutiny, which have a very great influence on the product.

(2) A strong prejudice against wilderness classification is shown in many of the sections of the DEIS.

(3) The RARE II DEIS attempts too much for one EIS. It tries to establish alternative approaches to decision-making, to set wilderness goals, to evaluate and compare roadless areas, and to make final selections of roadless areas for wilderness all at once, without offering alternatives for any but the final

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selections. Each of these steps is a major action requiring lengthy agency attention and public comment. The haste, brevity, and confusion of the present RARE II program effectively obscure many important steps. Perhaps the most shocking indication of the multiple objectives of this DEIS -- and of the illogic of pursuing them simultaneously -- is the fact that at one and the same time the DEIS proposes "criteria and approaches to be utilized in making a decision and the allocation of specific roadless areas for either wilderness or nonwilderness use." (Emphasis added.) (DEIS, p. i.) (See also, pp. vii, 107.) In short, the Forest Service is offering the public a set of possible questions which it may ultimately ask and of possible answers which it may ultimately give. Apparently it is only at the final phase of RARE II -- when the decisions are actually made -- that the public will find out exactly what questions the Forest Service decided to ask and what answers it decided to give. This confusion of general process questions and specific application questions in the same Draft EIS means that the public will never have an effective opportunity to determine whether the Forest Service has given the right answers to the questions it chooses. NEPA certainly intends, at a minimum, to give the public a firm opportunity to know just what proposed course of action a federal agency contemplates before any decision is made. The Forest Service, in violation of this statutory purpose, has presented the public with a moving target, whose speed and uncertain contours make effective public response close to impossible.

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I. PROCEDURAL FLAWS IN THE RARE II PROGRAM RESULTING IN DEIS INADEQUACIES.

Basic decisions concerning the structure of the RARE II program, its operational principles, its scope, and its haste have diverted the program from its goal of providing an effective and fair evaluation of the wilderness potential of roadless Forest Service lands. These flaws cause serious inadequacies in the DEIS.

(1) Incomplete Inventory -- RARE II was proposed as a comprehensive national reevaluation of the roadless area/wilderness question within the entire National Forest System to remedy the failings of earlier planning processes. However, it was decided early in the RARE II program to exclude virtually all lands that had been dealt with in planning studies since 1973, regardless of the deficiencies in those plans.

The inventory was to be composed in part by the following process:

- " 3(a) Add any areas missed in the original inventory. These areas should:
 - i) Contain 5,000 acres or more, or
 - ii) Contain less than 5,000 acres but due to physiography and/or vegetation, are manageable in their natural condition, or
 - iii) Be a self-contained ecosystem: e.g., an island"

6. List and subtract areas allocated for nonwilderness in land management plans for which final environmental statements have been filed so long as the areas are not included in Administration- endorsed pending legislation." Excerpts from letter of Chief John McGuire, June 27, 1977, as quoted in "Fact Sheet No. 2, Forest Service Guidelines for Inclusion of Western Forest Areas in the RARE II Inventory." See also, 42 Fed. Reg. 59716 (Nov. 18, 1977).

The decision to delete lands allocated to non-wilderness

in completed plans from the RARE II process renders RARE II incapable of being comprehensive. Approximately 10 million acres of qualifying roadless lands allocated to non-wilderness are thus excluded from consideration in the RARE II program. Some of these lands have never before been inventoried as roadless and none of them has ever been evaluated by the new standards, policies, and procedures of the RARE II program -- a program which was to be a "new look" at the issues which would remedy admitted faults in the land management planning and RARE I processes. This decision to delete 10 million acres of qualifying lands also weakens the capability of RARE II to provide accurate input to the RPA program since the data base generated in RARE II is incomplete.

The second problem is that the instructions were not followed precisely, with the result that many National Forests did not first inventory and then subtract such areas, but rather never inventoried them at all. Thus there is not even an accurate assessment of how many additional acres and areas of roadless lands outside the RARE II program exist on the National Forests. The lands excluded under this category are not uniformly distributed throughout the National Forest System. Instead, they are concentrated in a few specific areas, notably central Nevada, the Boise and Sawtooth National Forests of Idaho, the Kootenai National Forest of Montana, and the Willamette National Forest of Oregon.

RARE II also overlooks important roadless areas which do, in fact, meet its basic criteria and thus deserve inclusion in the inventory. There have been approximately 100 challenges

to these exclusions.

(2) Speed Before Quality -- The decision to complete RARE II hurriedly has forced the program into a posture of being unable to correct the major errors of procedure and structure, making much of the public reaction a futile endeavor. Moreover, no explanation is given in the DEIS of the problems which led to the perception of a need for such a rapid and comprehensive program. Allegations have been made of an impending timber products crisis and local economic disruptions. An objective survey, however, is needed to establish to what extent and in what areas situations exist that actually require accelerated decision-making. This would provide the public with important guidance on what areas and issues are most significant. It would also provide useful information on key conflicts, allowing the Forest Service to develop alternatives for dealing with specific urgent situations.

If the RARE II program is actually to arrive at better decisions than those resulting from previous efforts and the Land Use Planning Process, it can do so only to the extent that it has a higher quality of information and analysis than those studies. This is not a likely result in view of the extreme haste with which the program is proceeding.

The "speed before quality" approach is illustrated by a July 31, 1978, memo from the Washington Office of the Forest Service. It said, in part:

" The RARE II process is too far along to implement new and complex methods, processes, or systems, unless they (1) are tried and proven, (2) are easily understood, (3) are easily applied, (4) save time and/or other management resources, (5) use existing data, (6) can be applied

within the National Forest System. Nothing better illustrates the departure of the program from its stated goals and nothing magnifies the programs weaknesses more than the minimization of this "Further Planning" category.

(4) Basic Decisions Out of Step with Resources Planning Act -- The 1980 Resources Planning Act Program, now in preparation, will be circulated for public review and finalized in 1980. This program will cover many of the same program aspects of National Forest System management covered by RARE II, but it will do so with a much larger data base and a more comprehensive perspective. For example, it will cover all Forest Service lands. The Resources Planning Act could be used as a means of reevaluating the "Further Planning" allocations, and the RARE II program could be used to provide many of the necessary details on the wilderness question for use in RPA. Instead, decisions on the allocation of roadless areas are being forced without adequate information.

Moreover, alternatives presented in the RARE II program have been severely constrained because the program has used targets for the National Forest System established by the 1975 RPA program. (DEIS, pp. 49-51; "RPA: A Recommended Renewable Resource Program, U. S. Forest Service (March 2, 1976), p. 78, pp. 633-635 (hereinafter "Program").) Other than the all wilderness alternative, none of the alternatives would allocate more acreage to wilderness than the 1975 target of 25 to 30 million acres in the year 2015. (DEIS, p. 5.) This is so in spite of the fact that those targets will be completely reexamined and revised within the next two years. This puts the Forest Service in the awkward position of having to reverse 1978-79 RARE II decisions should the targets and goals be

substantially revised in 1980. Even worse, any of the RARE II decisions that release roadless lands for non-wilderness uses may well be quickly irreversible, even if RPA data soon indicate that these decisions were unwise.

The National Environmental Policy Act requires that an EIS present a detailed analysis of alternatives to a proposed action. The discussion of alternatives must present a "rigorous exploration and objective evaluation of the environmental impacts of all reasonable alternative actions." (CEQ Guidelines, 40 C.F.R. 1500.8a(4)) The RARE II program should thus not be constrained by the RPA goals, which are now slated for comprehensive reevaluation, and are significantly outdated in their treatment of wilderness. Since the 1975 RPA Program was prepared, new wilderness legislation has been passed and the Forest Service wilderness review process has been criticized in Congress (see H. R. Rep. 95-540, 95th Cong., 1st Sess., 4-6 (1977)); RARE II itself has been initiated and has generated some new resource information; and the Forest Service has rejected its earlier "purity" approach to wilderness evaluation and management. These developments make obsolete several of the RPA Program assumptions. There are much greater opportunities for establishing and rehabilitating wilderness areas and for meeting the RPA Program goals for recreation through expansion of the Wilderness System than were recognized when the 1975 Program was prepared. (See Program at 30-32, 35-36, 73-75, 78-80.)

Moreover, the RPA Program treatment of alternatives for "total wilderness acres" is not relevant to the purposes of RARE II. The purpose of the RPA Program wilderness discussion was to give the Forest Service some ability to predict how

II. ROADLESS AREA EVALUATIONS INADEQUATELY PERFORMED

The roadless areas were evaluated and compared with each other in terms of WARS (Wilderness Attributes Rating System) scores, resource outputs (energy, minerals, timber, grazing, recreation), ecosystem representation, landform representation, and geographic distribution and accessibility. The obvious questions that must be asked are: (a) Are these ratings appropriate for RARE II's purposes? (b) Do they accurately reflect the values and resources they purport to measure? (c) Were the evaluations accurately performed?

(1) WARS -- In theory, the Wilderness Attributes Rating System would appear to be a sound technique for evaluating certain aspects of the wilderness resource having to do with scenic and recreational values as perceived by the recreationist. ("RARE II: Wilderness Attribute Rating System: A Users Manual.") But the DEIS presentation and application of the system are faulty. Although briefly referred to in the DEIS (p. 19), the procedure is not explained at all.

The scoring of given areas varied greatly from one rating team to another. Thus, although the results would have been of great value had the ratings been done on the same basis, the ratings actually used in the RARE II program reflect these regional variations.

For example, Tatoosh, a 17,000-acre ridge extending out of Mount Rainier National Park into Gifford Pinchot National Forest, received a WARS rating of 24. Just a few miles away, Cougar Lakes, a 200,000-acre area including several ridges originating in the park, a lake-dotted plateau, rugged peaks, timbered

valleys, and some minor canyons, received a WARS rating of 21. Both areas possess considerable wilderness value; both were selected for study in RARE I.

More time and effort will be required to sort out such local inequities and to work out the basis for comparison of WARS scores for areas in different parts of the country.

In assembling the alternatives, an arbitrary cutoff level of areas in the top 40% in WARS scores for each region was allocated to either Wilderness or Further Study in Alternative D. How this 40% figure was determined was never stated, nor was there any analysis to indicate how areas and acres were distributed statistically. The choice of 40% is a mystery. Moreover, the regional supplements do not identify what WARS scores represent the 40% level.

The WARS screening does not adequately account for the size of the areas being considered. Other factors being equal, an area of 10,000 acres with a WARS score of 23 will be selected for wilderness ahead of a 250,000 acre area with a score of 21. A size criterion should be added to the evaluations.

Although size was accounted in formulation of the WARS rating, it was not given a dominant role: it was properly accounted as being a quality which contributes to the solitude aspect of wilderness quality. This is quite different, however, from measuring the quantity of wilderness represented in an area. Thus, WARS has a component which assesses the impact of the size of an area on wilderness quality, but the WARS rating does not assess the quantity of the resource present: the evaluation of areas for alternative formulation

as providing sufficient information for allocation of roadless areas.

(4) Timber -- There is insufficient consideration of the impacts of achieving timber potentials on such other resources as water quality, wildlife and recreation. The timber management plans from which the data are derived vary greatly in quality, in the extent to which realistic multiple-use constraints have been applied, in management and investment assumptions, and in other important factors. Thus, the data used are not truly comparable from one area to another in different National Forests.

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Additionally, there is considerable confusion about the meaning of potential productivity measured in board feet. In some instances, this number includes such non-sawtimber products as posts, poles, and pulpwood, and occasionally the DEIS and supplements are ambiguous in this respect. (DEIS, p. 15.) While there may be many areas in which the potential productivity for these products exceeds current demand, the use of such potentials is of dubious value.

As in the case of WARS ratings, arbitrary threshold levels were established in constructing the alternatives, (for example, at 2, 4, & 8 MMEF, and the top 5% level in each region) without any discussion or justification provided for using those levels to allocate roadless areas. The regional supplements do not provide sufficient detail as to what falls into the 5% level.

For unspecified reasons, the timber threshold levels for the eastern regions in Alternatives C and D were set at half the threshold levels used elsewhere in the country. No discussion of the reason for this decision is included in the

DEIS. This reflects a serious bias against additional Wilderness in the eastern states.

(5) Grazing -- In the case of grazing, there are the same problems of justifying threshold and cutoff levels. 300 AUMs and 750 AUMs are used as thresholds without further explanation. A 5% level criterion for each region is also used, but its derivation is not clear. Regional supplements do not state what the 5% level means in AUMs. In addition, the techniques for estimating grazing potential vary from region to region. Since grazing is a permitted use of wilderness areas, the use of arbitrary grazing levels to remove areas from consideration is particularly inappropriate and mystifying.

(6) Recreation -- As with other resource areas, impacts on recreation are assessed in terms of their absolute potential, without regard for the costs of using those potentials, the impacts of doing so, or demand. The threshold levels are not justified or discussed.

There is a very serious problem also in considering all potential forms of recreational use as equal. One day of downhill skiing is considered to be equal to a day of camping or a day of backpacking. While it may indeed be difficult to assess the different "values" of these kinds of recreation, the demands for them are quite different and the role of roadless areas in supplying each type of demand is very different. There are many roaded National Forest areas that can fill the demand for motorized camping, but there are very few areas besides roadless lands that can provide oppor-

present. Moreover, some single landforms may cover more than 15,000 acres. The target levels are also very low -- one 15,000 acre area as a "Low Target" and three 15,000 acre areas as a "High Target".

Under the system used, absurd results are possible. Dinosaur National Monument and Yellowstone National Park are in the same landform type; Bend, Oregon, is in the same category as Big Bend National Park; the north end of the Cascade Mountains of Washington is in the same category as the south end of the Sierra Nevada of California.

This system must be restructured and redefined. The provinces must be subdivided. Within each subprovince, the basic landforms should be identified and mapped. Additional targets should be established for each subprovince and forest.

(9) Geographic Distribution and Accessibility -- This criterion has many serious flaws. There was a choice of 250 airline miles as the standard of accessibility to potential wilderness users on the assumption that this distance represented a feasible one day's travel, regardless of road and rail access (DEIS, p. 25-26). It is not clear how the calculations of wilderness within this radius were performed because it is stated that both "total and potential" wilderness acreage are included. What is included in "potential" wilderness? The data generated are not included in either the national or regional EISs. (The map in the national DEIS is misprinted; "above median" and "Category C" counties are indistinguishable. DEIS, p. 94).

The remedial targets set to fill the gaps are expressed

not in terms of additional acres/population but in terms of areas/population. (In essence, the problem is identified using one statistical measure -- acres within 250 miles of populations. Then, an attempt to deal with it is made by means of another, less accurate measure -- areas/population.) Moreover, since the carrying capacity, or recreational capacity, of wilderness is related to the size and not the number of areas, this is clearly absurd.

Those counties with no RARE II areas within 250 miles are simply abandoned by the program. It would seem to make more sense to place special targets for additional areas in either those RARE II areas nearest such counties, or those RARE II areas known to be used by residents of those worst-case counties.

An examination should be made of the absolute spatial distribution of wilderness in the U. S. to determine if there are notable gaps that should be filled. In all probability, new ecosystem and landform criteria would improve the distribution but may not go far enough.

Accessibility to wilderness has a strong temporal component. Many wilderness areas have a short season of accessibility because of snow, flood, heat, or fire danger. Areas should also be rated in terms of available acre-months/year to provide additional useful data. Moreover, the nature of the transportation available in the area should also provide an additional relevant measure.

(10) Wilderness-Associated Wildlife -- This criterion measures the representation within the present Wilderness System of certain wildlife species associated in the public

III. "AFFECTED ENVIRONMENT" INADEQUATELY DESCRIBED

This section of the DEIS attempts to outline the characteristics of the National Forest System and the National Wilderness Preservation System. However, it does not fairly reflect the character of the lands involved in the RARE II program. This assessment should tell the public and the decision-makers how the roadless lands differ from and compare with the rest of the National Forest lands and the rest of the United States. This is key to understanding the entire process. Instead, we find only the most general and incomplete discussion of the forest system.

For example, this section should point out that the National Forest Lands are in general of higher development cost and environmental sensitivity than private lands. In general, they are located farther from potential markets. Of these National Forest lands, the roadless areas are even more sensitive, costly to develop, and remote. In general, they are of comparatively low economic value and high environmental cost. This section should explore the significance of roadless lands for wildlife, vegetation, diversity, and recreation.

The overview should also outline trends in the uses and outputs from the National Forest System. For example, the trail system reportedly has declined from 150,000 miles to about 95,000 since the Second World War. At the same time, the network of roads has gone from less than 50,000 miles to well over 200,000 miles, and is projected to grow to some 300,000 miles.

The public is informed that certain non-wilderness-compatible forms of recreation (e.g., motorized dispersed) occur

within roadless areas, but the exact nature of that activity and the acreage involved are not clear (DEIS, p. 14).

While timber potentials and grazing potentials are mentioned, no national scales are provided against which to measure these potentials. The public is told what contribution the roadless areas could theoretically make to the mathematical calculation of programmed timber harvest of the National Forests, but is never told what contribution is actually accounted for in the current program under present funding levels.

potential short-term impact of minus 26 MMBF. However, the final land-use plan recently adopted by the Regional Forester there calls for a programmed harvest of 18.7 MMBF.

There are a number of places here and throughout the DEIS, as mentioned above, where it is unclear whether or not the figures given for timber outputs include non-sawtimber products. This could be made clearer by using MMBF for sawtimber and EMMBF (equivalent million board feet) for all timber products. Many forests do not sell close to their programmable harvest of non-sawtimber products in most years. Thus, the inclusion of these products in calculations of "short-term" impacts is highly misleading.

The data used in the impact modeling came from a variety of sources and vary in accuracy, and this should be taken into account. For example, timber yield estimates based on pre-1970 timber- and land-management plans are uniformly higher than yield estimates based on more recent plans. (This can be established by comparing new and old plans. Exceptions that occur are generally due to changes in utilization standards, not a change in yield, resulting from increased investment in intensive management and a change in mensuration.) This is true because older plans uniformly overestimated the amount of operable commercial forest land on the National Forests and underestimated the area necessary to protect other multiple-use values. Estimates based on the earlier plans should have been discounted before use.

(2) Recreation -- The computer data sheets indicate that the Forest Service gathered information on such topics as the acreage of roadless areas involved in "non-compatible recreation." This aspect never surfaces in the DEIS, which also does not discuss the negative environmental impacts of this recreation. Establishment of this relationship is essential in predicting the impact of non-wilderness designations.

Trends in demand for different kinds of recreation should be taken into account. Moreover, wilderness designation can be expected to draw backpackers to the areas involved and probably also promote a net increase in this form of recreation.

(3) Grazing -- The modeling of grazing impacts is unacceptable. It forecasts substantial reductions in the grazing capacity of lands classified as wilderness without any factual basis. In reality, grazing on lands designated as wilderness has declined no more rapidly than grazing on non-wilderness National Forest lands. It is not shown that management activities for grazing are incompatible with wilderness, or indeed whether some reduction in grazing is required to protect other National Forest resources. A recent study concluded that, ". . . there was little or no correlation between the increase in wilderness acreage and the decrease in wilderness permittees and in total wilderness grazing." (E. V. Treman, Senior Thesis, Env'tl. Studies, Univ. Calif. Santa Cruz, 26 May 1976, p. 34)

(4) Population -- The outputs of the model predict reduced population levels in some cases. (DEIS, p. 99) This is unrealistic. While economic pressures can change

population migration patterns, the projections in the cases under consideration in this study are absurd.

(5) Economic -- The manner in which the DEIS handled economic costs in weighing wilderness and non-wilderness options resulted in an impression which is seriously biased in favor of development and non-wilderness use. Far more sophisticated and balanced benefit/cost analysis could have been done. While the economic benefits of wilderness were underestimated, the costs were given generous, but flawed discussion. At the same time, much emphasis was placed upon the economic benefits of non-wilderness with the costs all but ignored.

In discussing potential non-wilderness commodity values, the DEIS admits (p. 51) "a benefit/cost study or investment analysis to determine if it is economically feasible to harvest the resource has not been made. Likewise a demand study to see if the resource output would or would not be sold at current prices was not made."

The only information given as to the methodology underlying the projections is that input-output models were used. However, input-output models are notoriously unreliable in predicting the behavior of a real world, market economy where output is not the result of government fiat, but the sum total of private decisions. The effects of the alternatives in our market system should properly be the focus of the DEIS economic studies, including full cost accounting and appropriate imputed values for wilderness areas. Input-output models project what is a technically feasible output, which may not be the most

economically viable option.

Input-output models commonly use fixed coefficients, but in a market economy tradeoffs are the rule. The DEIS analysis appears to have only considered the relatively local economic/employment effects. Input-output models usually study behavior in only one sector of the economy, making no adjustments in the rest of the economy for activity in that sector. In other words it appears that the DEIS ignores the fact that people who would have been employed under a non-wilderness designation will find alternative employment, produce income and value added elsewhere in the economy under wilderness designations. This employment "offset," over time, will involve all affected. It is obviously insufficient to consider the costs of wilderness and non-wilderness alternatives only in terms of commodity outputs and employment possibilities foregone. The full costs of developing and harvesting these outputs must be considered even if complete precision is not attainable.

The recently released Development Opportunity Rating System (DORS) data (43 F.R. 41010) would seem to be mostly a reshuffling of previously extant data, and do not fill the serious gaps in the DEIS analysis of costs and benefits. While the DEIS considers the reduction in federal receipts that would result from a reduction in federal timber sales, no mention is made of partially offsetting reductions in expenditures, and savings of taxpayers subsidies, that would result from reduced needs for personnel, road construction, etc., that would normally be required for a federal timber sale and harvest. In addition, while employment in a

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particular area due to non-wilderness designation is an economic benefit to those obtaining jobs, the cost of their wages must be subtracted from the value of the non-wilderness area when considering the economics of alternatives.

Wilderness preservation has many values besides recreational use. John V. Krutilla and Anthony C. Fisher, The Economics of Natural Environments (Johns Hopkins University Press, 1975). Hence, a valid conceptual base for studies such as RARE II DEIS must consider all of the value of public items destroyed by many non-wilderness choices. Watersheds are an extremely important public economic asset, the value of which is rapidly growing and, if economic indicators were applicable to this non-market resource, it may be rated in many places as more valuable than the lumber and other resources it contains. The costs of erosion and of flood destruction, albeit indirect and often delayed, are real and are traceable back to wilderness/watershed destruction. Roadbuilding to harvest timber is the prime cause of serious soil erosion and loss of water retention capabilities in our roadless National Forests. F. J. Swanson and C. T. Dyrness, "Impact of Clear-cutting and Road Construction on Soil Erosion by Landslides in the Western Cascade Range, Oregon," Geology, vol. 3 no. 7, July 1975. See also, Robert Coats, "The Road to Erosion," Environment, vol. 20 no. 1, Jan./Feb. 1978. Airshed protection is another item of growing health, hence economic, importance. Of unknown but potentially great economic importance to future generations is the preservation of genetic strains within our roadless areas. Generally, the mechanical, biological, and economic interrelationships of

the wilderness/non-wilderness choices were vastly underrated by the DEIS.

To more properly conduct the analysis, a much greater effort should have been made to estimate the economic value of wilderness preservation. While this is admittedly difficult since it is non-marketed, a much more appropriate and accurate result would have been obtained. The Defense Department commonly uses cost/benefit analysis in military situations much more difficult to quantify than RARE II. The fate of 62 million acres cannot be decided by apparent "informed guesses" when more careful, systematic cost/benefit analysis is available.

The "output" of wilderness, while not apparent in our economic indicators, is a scarce economic good, similar to marketable outputs. While the preservation of wilderness need not create the same number of measurable jobs as mineral extraction program, it still produces an "output" of obvious economic value. No economist would claim that the secular shift from manufacturing goods to providing services in our economy has caused a drop in our real GNP, despite its causing a decrease in employment in certain sectors of manufacturing. Services, too, have obvious economic value, so that real income has increased as a result of the shift. Similar effects occur when we choose to preserve non-marketable, public wilderness areas.

Over a period of time, as population and GNP grow, experience has shown that technology leads to greater productivity of commodities and to greater substitutability of one commodity for another. However, the same is not true of the services of

wilderness areas. These are not produced and hence not subject to productivity gains. They are available only in whatever amounts we choose to preserve them. It follows that wilderness areas, and natural areas in general, increase in value over time relative to commodities. Wilderness is also becoming more scarce relative to developed areas. These very significant dynamic considerations must be included when analyzing the cost/benefit relationships involved in a decision irrevocable for future generations. Development is final. Preservation is not.

The issue of taxpayers subsidizing various non-wilderness options must be considered when evaluating the actual costs of the given alternatives and those that may arise before the final EIS determinations. Wilderness use is also subsidized, but nowhere to the extent of the extraction/development industries. Hard rock mining has long been subsidized in public policy. Biases toward exploitation that already exist in federal programs due to various subsidies perpetuate exploitation since the DEIS uses present commodity outputs as criteria for non-wilderness designation. The existence of "producing mines" or "proven mineral reserves" is sufficient alone to disqualify a wilderness allocation in some alternatives (C, D, H, and I). Grazing fees on public lands are still substantially below those on private lands. "A Study of Fees for Grazing Livestock on Federal Lands", A Report from the Secretary of the Interior and the Secretary of Agriculture, Oct. 21, 1977. Competitive bidding is the general rule in Forest Service sales, but the bid price does not always lead to full coverage of Forest Service costs.

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"Forest Service Pricing Mechanism for National Forest Timber Sales," Cong. Record, H 4169, May 10, 1976. To the extent of subsidy there is overuse, which, in the RARE II DEIS, becomes a criterion for further overuse.

As far as analytic details go, there are several problems, a few of which will be addressed.

The analysis of recreation as an output (DEIS, pp. 37-39) assumes that a visitor-day of recreation is equally valued whether it is in the non-motorized dispersed, dispersed motorized, or developed recreation category. It does so by looking only at the gross outputs and net effect in terms of the number of recreation visitor-days' use that would result from each of the alternatives that are evaluated. This not only ignores recommendations of Federal standard-setting agencies such as the Water Resources Council, (see Senate Document No. 97, Policies, Standards, and Procedures for the Formulation, Evaluation and Review of Plans for Use and Development of Water and Related Land Resources, USGPO, Washington, D. C., 1962, and its up-date, Water Resources Council, Water and Related Land Resources: Establishment of Principles and Standards for Planning, published in Federal Register, Volume 38, Number 174, Part III, September 10, 1973), but also gives the impression that a day of recreation in the wilderness is equivalent to a day in a developed setting and that maximum use is consistent with maximum economic gain. This problem could be corrected through the use of a suitable weighting scheme or through a benefit-cost analysis which requires that dollar values be assigned to each of the recreation-day outputs.

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Throughout the analysis the effects of price on supply and demand are ignored, e.g., "If all the areas were recommended for wilderness, as in Alternative J, there would be an immediate increase in use of 3.5 million recreation visitor-days." (DEIS, p. 37.) The method for arriving at the 3.5 million figure is not presented, but it most likely represents a simple projection. If a demand study had been utilized, visitation rates would have been related to the number of people "in the market," the price (travel cost) of a recreation day, prices of substitute goods, income levels, and other determinants of demand. A demand study would come much closer to representing public consensus than the more or less arbitrary, undocumented, assumptions made in the DEIS. Another example of disregarding real factors which determine supply and demand involves timber. The statement is made: "The effects on timber harvest as any of the ten alternatives is implemented vary according to the amount of land each alternative proposes for wilderness classification, the productive capabilities of that area, and the amount and productivity of the land remaining for non-wilderness uses." (DEIS, p. 41.) Timber prices and other market factors are simply not discussed in the DEIS.

(6) Housing -- In the DEIS there is an attempt to convince the public that there is a significant connection between wilderness designation and housing inflation. However, a number of separate, and recent, studies indicate that substantial increases in timber harvests in National Forest roadless areas would have an insignificant effect on the total cost of housing. See, e.g., Sierra Club "Timber Harvest in the National Forests and its

Relationship to Lumber Supply and Housing Costs", 14 July 1978. This is largely due to the fact that lumber accounts for about 7% of the total cost, including debt service and land, of a typical single family home, and an even smaller percentage for an apartment unit or condominium. Land and development costs and the costs of financing were the areas of greatest impact on the increase in housing costs in the last ten years according to the National Association of Homebuilders. It may well be more significant to discuss the economic distortions, including inflation, of the American taxpayer's money subsidizing the development of roadless areas, many of low resource value.

(7) Balance of Payments -- In discussing our balance of trade accounts and lumber supply, it is true that curtailing our very substantial annual exports to Japan would have some negative effect on these accounts. However, increasing our imports of lumber from Canada, a result of stabilizing our National Forest harvests, would likely have insignificant effects on our long term trade balance with Canada. In 1977 we took 10.4 billion board feet of lumber from Canada, about 30% of our domestic consumption that year. Even so, in recent years there has been a continuing and rapidly growing trade surplus with Canada, now at about \$4 billion a year. This is underscored by a continuing currency relationship favorable to the U. S. All this indicates the propensity of the Canadians to rapidly return U. S. dollars through purchases of our products.

Perhaps of much greater significance to our balance of trade than the importation of lumber is the fact that many non-wilderness designations will promote fuel-intensive, motorized

recreation, with the impact of importing fuel on our foreign trade accounts being quite well known.

Intensive management of presently developed forest land can substitute for the development of new areas at comparable costs. According to the Forest Service net annual growth on the 67 million acres of commercial timberland in forest industry ownerships is far below potential, in 1970 less than a third of the production attained in some intensively managed plantations. The Demand and Price Situation for Forest Products, 1976-77, USDA Forest Service.

Finally, logging is subject to very wide cyclical swings, some of this the result of previous, improper timber management practices. In any event when the timber is finally gone in a locale solely dependent on that industry, problems arise which could be mitigated by encouraging resource preservation and economic diversity now, partially through the vehicle of RARE II decisions.

(8) Energy -- The discussion of energy impacts in the DEIS (pp. 47-49), like other impact sections, focuses on the potential costs of non-development and ignores the costs of development. Other relevant topics are not mentioned. For example, additional road construction is itself energy intensive. The construction and use of developed recreation facilities and increased use of ORVs also will stimulate energy consumption.

V. ALTERNATIVES

The alternatives offered play a critical role in an EIS. They channel governmental decisions and direct public attention and comment; they also serve as reference points in dealing with the same topic in the future. It cannot be overemphasized that the lack of adequate environmental and economic impact assessment data makes the effective formulation and evaluation of alternatives essentially impossible. Similarly, it is nearly impossible to formulate alternatives to meet perceived needs without adequate assessment of the reality of those needs. These fundamental inadequacies in the DEIS call for a conservative approach to making final decisions. The only alternative that the sparse analysis of this DEIS can substantiate is one which places a substantial portion of the roadless lands in a Further Planning category.

The alternatives presented in the DEIS are drastically inadequate. They do not display a sufficiently wide array of possible choices. All of the "working alternatives" (C through I) in the DEIS (as opposed to the "reference alternatives," A, B, and J) minimize the Wilderness and the Further Planning Categories and maximize the Non-Wilderness category. For example, the largest wilderness acreage there considered is 33% of the RARE II inventory; the smallest non-wilderness acreage considered amounts to 37% of the inventory. (DEIS, p. 32.)

Whereas RARE II is supposed to provide meaningful input for the 1980 RPA Program, it is ineffective in displaying options varying from the 1975 RPA goals. While none of the working alternatives would cause resource outputs to fall below the

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1975 RPA targets, most of the alternatives would allow wilderness to fall below those targets. Only one of the working alternatives would exceed the 1975 wilderness target. (We note with interest that the Forest Service will be releasing additional information on the relationship of RARE II to RPA Program goals. 43 F.R. 41010.)

The DEIS asserts that the goals and targets set out for the Ecosystem, Landform, Wildlife, and Distribution Criteria are important considerations, but only two of the seven working alternatives meet their Low Level goals for these criteria; only one meets the High Level goals. It is obvious that many alternatives could have been presented that could meet or preferably exceed these goals, which are extremely low to begin with.

It is as if the established targets for all other resources were considered mandatory and the established and proposed goals for wilderness were optional. Yet, the Wilderness Act established that:

" . . . 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."

This is hardly an optional goal.

The real need for resolution of aspects of the "roadless area question" exists chiefly at the level of local communities. If the economic health of these communities is of prime concern, then alternative approaches to maintain this economic health should be developed. In order to do this, the dependent communities must be identified. Then, a range of alternatives that would support such communities, including investments

other than the development of roadless areas, should be developed.

It has often been pointed out that, in some areas, communities need not depend on the development of roadless areas. Intensive management of presently developed forest land can substitute for the development of new areas at comparable cost. This option was not discussed in the 1975 RPA Program, nor does it appear in the preliminary documents for the 1980 RPA. It certainly does not appear in the RARE II Program. Yet, this vitally important option exists and offers an economically viable means of doing a better job of satisfying competing concerns and constituencies than any of the alternatives found in RARE II.

VI. DECISION CRITERIA

Near the end of the DEIS (p. 67) is a section on the criteria by which proposed decisions are to be evaluated. These criteria are presented without any discussion of their origin or of alternatives to them and without any indication of how they relate to the evaluation criteria.

Some of these goals appear to be logical, others much less so. There is no particular congressional mandate for particular goals.

(1) RPA Goals -- Limiting the goals to those of the 1975 RPA limits the ability of RARE II to contribute to the 1980 RPA Program. It ignores the fact that the 1975 RPA indicated that higher wilderness goals were possible without adverse impacts on the budget or resource output. (See, Program, pp. 574, 633.) The 1975 goals were crudely constructed compared to what is possible today.

(2) Commodity Outputs & Community Stability -- As stated, this criterion is a major mistake. Even if those impacts were accurately stated, which they are not, it is wholly improper to consider the costs only in terms of outputs foregone; the costs of developing those outputs and the environmental price of doing so must be considered, and alternative ways to deal with local impacts should be considered.

(3) National Issues

Virtually none of the national issues mentioned will be significantly affected by any possible RARE II decisions. If they are to be used at all as guidelines, then the discussion of them must cover additional aspects.

(4) The Evaluation Criteria -- The Evaluation Criteria were discussed above.

In addition, the potential contribution of an area should be considered in making boundary adjustments, and efforts should be made to include within the recommended boundaries of Wilderness or Further Planning areas the landform, ecological, wildlife, and other values present within the overall area.

(5) WARS Rating -- The problems mentioned above must be resolved, with area size entering the equation more directly.

(6) Need to Allocate; Grassland Bias -- A proposed decision criterion is that "to perpetuate current cooperative management of the National Grasslands, areas located within the Grasslands will not normally be allocated to wilderness. . . ." This biased criterion has had undue influence on the allocation alternatives, and most deserving potential grassland wildernesses are only recommended for wilderness allocation in Alternative J. None of the statutes that govern the management of National Grasslands contains any prohibition against managing them as wilderness. Indeed, it could be argued that managing the few remaining grassland roadless areas as wilderness would be an essential part of the federal program of using the national grasslands to demonstrate sound land and water conservation practices through various management approaches. There is ample national grassland acreage devoted to the demonstration of the effect of intensive management.

Specifically, Section 31 of Title III of the Bankhead-Jones Farm Tenant Act authorizes the Secretary of Agriculture to manage the national grasslands:

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"to correct maladjustments in land use, and thus assist in controlling soil erosion, reforestation, preserving natural resources, protecting fish and wildlife, mitigating floods, preventing impairment of dams and reservoirs, conserving surface and subsurface moisture, protecting watersheds of navigable streams, and protecting public lands, health, safety, and welfare, but not to build industrial parks or establish private industrial or commercial enterprises."

Wilderness management is consistent with all of these stated objectives. In fact, wilderness management could prove to be the most cost-effective way to achieve many of these objectives.

The proposed decision criteria emphasize the incompatibility of existing cooperative management and wilderness designation. However, there does not appear to be a sound basis for this objection in law or in practice.

Section 32(e) of the Bankhead-Jones Farm Tenant Act authorizes the Secretary to meet the management objectives of Section 31 by cooperating with "Federal, State, Territorial, and other public agencies in developing plans for a program of land conservation and land utilization . . ."

Ovviously this type of cooperative management can be continued within the context of wilderness designation. In fact, following the designation of any area as wilderness it is established policy for the land management agency to develop a wilderness management plan with the cooperation of other public agencies.

The supposed incompatibility of cooperative management and wilderness management is belied by the present management of roadless areas in the Little Missouri National Grasslands in

North Dakota. There, Forest Service land-use plans were developed in cooperation with other federal agencies, the state, the livestock organizations, and the general public.

VII. CONCLUSION

For all of the foregoing reasons, the Sierra Club and the Natural Resources Defense Council, Inc. urge the Forest Service to conclude that the Draft Environmental Statement is "so inadequate as to preclude meaningful analysis" and that, according to the Forest Service's own NEPA regulations, a revised DES . . . should be prepared, filed, and circulated." Forest Service Manual § 1952.62, 43 Fed. Reg. 21261 (May 16, 1978). Unless and until this is done, any action under RARE II -- perhaps other than highly selective, limited allocations to the Wilderness and Non-Wilderness categories, and broad allocations to the Further Planning category -- would be contrary to NEPA and thus would be unlawful.

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SOCIETY FOR RANGE MANAGEMENT

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September 29, 1978

Mr. Craig Rupp
Regional Forester
P.O. Box 25127
Lakewood, Colorado 80225

Dear Mr. Rupp:

Attached is a statement prepared by the Public Affairs Committee of the Society for Range Management concerning the RARE II Program of the Forest Service.

We would appreciate your making this statement part of the public record and considering the suggestions made therein in your analysis of recommendations on RARE II.

If the Society for Range Management can be of service in any way toward further input and consultation on this important subject, we would be most happy to respond.

Sincerely,

David A. Smith
Executive Secretary

DAS:jrp

Enclos.

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SOCIETY FOR RANGE MANAGEMENT

In response to the Draft Environmental Statement, Roadless Area Review and Evaluation of the United States Forest Service, the Society for Range Management cites the following Society Benchmark Statement on Wilderness and comments as follows:

"Wilderness Management

The Society for Range Management recognizes the principal value of designated wilderness to stem from a need to preserve portions of natural systems' pre-civilization conditions for purposes of scientific study and comparison.

The Society recognizes the unique recreational aspect of designated wilderness, but believes such use should be secondary to the scientific. Recreational use should not be permitted to detract substantially from the desired natural condition.

Wilderness provides a *datum of normality*, but since each biotic community requires its own reference point, the Society favors the establishment of additional wilderness in localities where suitable reference areas are lacking."

We applaud the efforts of the Forest Service in this monumental undertaking of a roadless area review and evaluation and have the following specific comments regarding the RARE II Draft Environmental Impact Statement:

1. Among the alternatives listed, we feel that alternatives E, F, or G would best meet the needs of our membership and the nation as a whole. Of the three alternatives, we favor alternative F.
2. On page 24 of the Draft EIS, we believe that the word "large" should be defined as it is used to describe size of land forms. Granted that a few thousand acres seldom represent many land forms, but the word "large" is so indefinite that there could be limit to its size.
3. On page 35, under the title "Vegetation", it seems to us that the assumption is made that vegetation did not develop under grazing and that other factors involved in plant community development, such as wild fire, are ignored.
4. On page 44, under the title "Range", we believe that clarification is needed. The basic assumption elsewhere in the Draft EIS is that wilderness will proceed towards climax. Therefore, if this is, in fact, true, then grazing capacity may not necessarily be expected to increase. We know that the grazing resource, properly managed, can enhance wilderness value.
5. On page 67 and 68, "Proposed Decision Criteria", our belief is that the decision criteria as generated on these two pages reflect that political considerations may be used more than resource considerations in arriving at a final disposition of roadless areas. We believe that the decision criteria should be strengthened to reflect resource space considerations for the future enjoyment of our nation's people.

We trust that our comments will be of some value as the Forest Service develops the final Draft Environment Impact Statement. Please be assured that the Society for Range Management stands ready to assist as may be requested to arrive at a just and equitable decision regarding roadless areas in the National Forest System.



SOCIETY OF AMERICAN FORESTERS

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September 29, 1978

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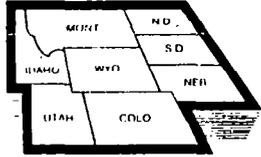
Dear John:

We are pleased to send you the enclosed comments of the Society of American Foresters on the U. S. Forest Service's Roadless Area Review and Evaluation (RARE II) process, including the national programmatic Environmental Impact Statement (EIS). The 22,000 professional foresters represented by the Society have taken a keen interest in this wilderness study. We appreciate both the efforts of your agency to successfully conclude this evaluation as well as the far-reaching implications this evaluation will have for all Americans. We are prepared to offer further assistance as you see fit.

Sincerely,

H. R. Glascock, Jr.
Executive Vice President

HRG:edl
Enclosure



Rocky Mountain Oil & Gas Association

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September 26, 1978

Mr. John R. McGuire, Chief
U.S. Forest Service
Department of Agriculture
P.O. Box 2417
Washington, D.C. 20013

Dear Chief McGuire:

The Rocky Mountain Oil and Gas Association (RMOGA) is a trade association of approximately 700 individuals, independent operators and major companies representing nearly every phase of oil and gas exploration, production, transportation, marketing and refining. RMOGA appreciates this opportunity to comment on the RARE II Draft Environmental Statements (DES) and the Wilderness Review Process, which potentially will have significant adverse impacts on this nation's mineral base, economy and social structure.

Most of the following comments pertain specifically to the National Programmatic Statement. However, they are equally applicable in most instances to the various state supplements.

I. INTRODUCTORY REMARKS

A. The Public Comment Process.

According to the DES, the Forest Service expects that the public will submit numerous detailed comments, which will enable the Forest Service to make responsible decisions on individual RARE II tracts. Yet, the DES's themselves and the various "public involvement" programs virtually guarantee that few Americans will have adequate information about either general Forest Service policies or specific RARE II areas to be able to make knowledgeable comments.

The DES's ignore minerals; say nothing about management of roadless and wilderness areas; fail to describe the future planning process; seriously downplay the economic and social impacts which massive wilderness designations will cost; ignore the important role of our public lands in the economy

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of states, communities and the nation; and represent RARE II as the nation's last chance for wilderness -- when in fact the Bureau of Land Management, Park Service, Fish and Wildlife Service, Alaska Lands bills and various congressional proposals for wilderness also remain to be considered. These other wilderness studies will almost certainly fill in any "gaps" which may still be present in the National Wilderness Preservation System (NWPS) following the completion of RARE II.

In other words, the Draft Environmental Statements and Public Comment Process have done nothing to eliminate the ignorance and misinformation which have surrounded RARE II from its inception.

The inevitable result will be generally poor comments which, in turn, will generate poor decisions.

This is a complete subversion of the NEPA process. The National Environmental Policy Act requires that:

1. the RARE II process be "systematic" and "interdisciplinary";
2. impacts on the total "human environment" (economic and social, as well as physical) be studied;
3. all "irreversible and irretrievable commitments of resources" be identified;
4. "appropriate alternatives" be developed whenever a proposal involves "unresolved conflicts concerning alternative uses of available resources"; and
5. "undesirable and unintended consequences" be identified and avoided.

These mandates have been largely ignored throughout the RARE II process, apparently on the assumption (articulated on several occasions by top Forest Service officials) that "Congress often makes pretty unwise decisions on the basis of far less than all the evidence."

It may be too late to avoid a multitude of poor decisions with which all of us will have to live for many years to come. However, an attempt must be made in the final environmental statement to undo the damage done to date and raise the level of public awareness about the issues involved in RARE II and similar wilderness programs.

B. RARE II and Minerals.

During the past decade, America has become increasingly dependent on foreign sources for the majority of its mineral supplies. We import

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nearly 50 percent of our oil, large amounts of natural gas and 50-100 percent of most of our other critically needed minerals. Many of these minerals could be found on our public lands, including those affected by RARE II.

Yet, through its RARE II policies, the Forest Service has effectively stopped mineral exploration and development on the public lands being reviewed for wilderness. Our economy cannot afford "surface protection" policies which go far beyond the intent of Congress and severely restrict or actually prohibit mineral prospecting and the development of deposits which are found.

Therefore, it is critical that wise and careful decisions be made now, and that those decisions are not unreasonably delayed.

II. INDIVIDUAL ROADLESS AREAS

Updated information on the oil and gas potential of individual roadless areas based on information submitted by RMOGA's member companies, is enclosed. Copies of these updated estimates have also been sent to your regional foresters. We trust that these tract-by-tract hydrocarbon estimates will be included in the final EIS in a tabular and summary form which makes clear to the reader what price he will be asked to pay in order to have large numbers of tracts designated as wilderness, and what costs (in terms of dollars and lost mineral resources) may be associated with the withdrawal of individual roadless areas.

III. PREFERRED ALTERNATIVES

The Draft EIS displays 10 alternative approaches for allocating the total RARE II roadless inventory. RMOGA does not believe that any single one of these alternatives is adequate, or that a combination of two or more of them can cure the current deficiencies, unless further language is added. We, therefore, propose the following alternative:

Emphasis is given to commodity outputs, to state, local and national issues, and to specific needs of the mineral industries for access to roadless areas and the right to conduct seismic, magnetic, drilling and other operations with the best available modern technology, subject only to reasonable environmental constraints. No roadless area having mineral potential will be recommended for wilderness until after exploration and production activities have been completed. Leasing will continue in accordance with law, and leases will no longer contain no surface occupancy stipulations. Only those roadless areas with the highest wilderness attribute ratings will be considered for wilderness recommendations.

This alternative recognizes the national need for minerals and the many problems which mineral exploration and development pose, especially in "roadless and undeveloped" areas, where detailed knowledge about minerals is currently lacking. Further support for this alternative is detailed else-

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where in these comments and in the enclosed papers.

IV. DECISION CRITERIA

The seven decision criteria listed on pages 67-68 of the National RARE II programmatic are good, but incomplete.

1. The Renewable Resources Planning Act does not cover minerals; therefore, the act should not be emphasized to the exclusion or minimization of the Forest Service's mineral-related responsibilities, as articulated in other national legislation. These other acts must also be discussed.
2. General public agreement is valuable only to the extent that it comes from a knowledgeable public which understands the policies, issues and consequences involved. Largely because of the way the Forest Service has handled RARE II, the public is probably not yet ready to make any wise decisions.
3. The cost of allocating areas to wilderness must be one of the major criteria. However, those costs must be based on facts and must be fairly and completely represented; the models used for determining these costs must be carefully constructed and their problems and limitations fairly discussed in the statement.
4. Another major criterion must be local, state and national issues, such as those listed on page 68. As presently worded, however, this criterion does not consider the fact that no information on proven reserves or high mineral potential can be developed under current Forest Service policies.
5. Preference should not be given to allocating roadless areas to wilderness merely because the addition of those areas might "increase the diversity and quality of the National Wilderness Preservation System," whatever that means. The Forest Service alone does not have to complete the NWPS. Moreover, the proven or potential presence of important mineral resources should operate against any preference that is given on the basis of wilderness attribute ratings.
6. The use of wilderness attribute ratings in the selection process is required by the Wilderness Act. However, areas with the highest numerical rating should be selected only if the evaluation process has actually been objective and only if all other facts are in fact equal. This presupposes that the individual tract's mineral potential is also known in detail and is accurately represented in the statement. Neither of these requirements has yet been met — nor will either requirement ever be met under current Forest Service mineral exploration policies.
7. Few roadless areas should be recommended for wilderness or future planning at this time. The location and extent of subsurface resources are not known; minerals data has not been presented in any of the 21 Draft

Environmental Statements; the economic and social analyses in the draft statements are incomplete and seriously misleading; future planning as currently defined provides no means for analyzing mineral resources potential; and there is no justification for any large-scale additions to the NWPS at this time. The economic and social impacts of either wilderness or future planning allocations will be both significant and widespread and must be detailed.

RMOGA recommends the addition of an eighth criterion: Surface and subsurface resource opportunity ratings. These ratings must be accurate, factual and graphically displayed in tabular form.

RMOGA also recommends the addition of a special criterion which spells out some of the specific needs of modern mineral exploration and development activities, especially in areas like the roadless areas where second or third generation exploration efforts are generally necessary.

V. GENERAL DEFICIENCIES IN THE DEIS

A. Oil, Gas and Other Minerals.

The single most glaring deficiency in the RARE II DES's is the almost total absence of information about the mineral potential of the tracts. In many cases, this potential is moderate to extremely high, for both fuel and non-fuel minerals. Yet, the reader is left with the false impression that few adverse social or economic impacts will be caused by wilderness designations, because few mineral deposits will be affected.

Detailed, tract-by-tract information on the oil and gas potential of 165 roadless areas was submitted to the Forest Service by RMOGA on March 10 of this year. This information was the most complete and up-to-date available on these tracts at the time. Yet, it was not included in the national DES or in the state supplements, nor was any reference even made to its existence. As a result, many tracts having a moderate to very high oil and gas potential were listed in the various DES's as having no potential. The final EIS must include the revised estimates which RMOGA is submitting as part of these DES comments.

The DES's also fail to acquaint the reader with the realities of mineral formation, location, exploration and development. These topics and the difficulties of determining mineral potential are seriously misunderstood by most Americans. Because of the critical importance of mineral questions in the RARE II decisionmaking process, it is essential that the final environmental impact statements include a section covering these points. RMOGA has enclosed a draft which we recommend be inserted in the final National Programmatic and in all final state supplements.

B. Distinction Between "Wilderness" and "Multiple Use".

There has been great confusion lately as a result of the Forest Service's recent decision to begin equating "multiple use" and "wilderness." According to this decision, the two terms are now interchangeable.

Wilderness is most emphatically not multiple use, even though very limited versions of several activities listed in the Multiple Use-Sustained Yield Act are permitted in wilderness areas. The decision to equate the two terms ignores clear statutory language, clear congressional intent and common usage of the terms. Throughout the West, and throughout the Forest Service, "wilderness" means highly restricted land use and little or no freedom of choice regarding use.

"Multiple use," on the other hand, is spoken of as the opposite of "wilderness" — by ranchers, timber people, the petroleum and mining industries, recreational users of the public lands, BLM administrators and Forest Service officials themselves. "Multiple use" to these people means freedom to use the land for a variety of activities, subject only to reasonable environmental regulations. It means vehicular recreation, timber cutting, ranching operations conducted according to Twentieth Century methods, watershed management, and exploration for oil, gas and other minerals. Wilderness designation, especially under current Forest Service policies, means none of these uses is permitted.

This dichotomy between "wilderness" and "multiple use" is critical. The distinction is not between "wilderness" and "development." The mere fact that a roadless area is not designated as wilderness does not mean that it will be "developed." Nor does it mean that the land will be destroyed by mineral exploration and production operations. The lands in question have been under multiple use management for decades. They are still in good enough condition to be considered roadless or wilderness. Several decades from now, because of the way mineral and other multiple use operations are conducted today, they will still be in good enough condition to be considered roadless or wilderness.

C. Wilderness and Roadless Area Management.

The DES's generally ignore the important topic of management of roadless and wilderness areas. They also state that "Wilderness designation will restrict, to some extent, or occasionally prohibit development of the mineral and energy resources." (National Programmatic, page 48) This statement is far from accurate. The fact is that, despite the clear and unambiguous language of Section 4(d)(3) of the 1964 Wilderness Act, the petroleum industry has been virtually locked out of the 2,686 inventoried roadless areas. It is impossible to assess an area's mineral potential or locate deposits under current Forest Service management policies. The Forest Service is asking the petroleum industry to give detailed information on individual tracts, while

at the same time it is prohibiting the industry from using the only methods which permit development of that information.

What discussion does exist regarding surface management is fragmentary, misleading and scattered through many pages of text. RMOGA recommends the inclusion of a separate section near the beginning of the final environmental statement to cover at least the following items:

1. The statutory definition of wilderness;
2. A practical definition of wilderness, noting which activities are allowed, which are forbidden, which are severely regulated and to what extent;
3. The distinction between "wilderness" and "multiple use" areas;
4. General roadless area management policies, in terms of permitted and forbidden activities;
5. A special section on mineral exploration and development, stating precisely how much leasing, access, seismic, drilling, and other activities will be allowed, and what restrictions will be placed on these activities; this section should also include Section 4(d)(3) of the 1964 Wilderness Act, in its entirety.

RMOGA refers you to its comments on the Forest Service's proposed "access and drilling guidelines." These comments were sent to Howard Banta, Director of Minerals and Geology, U.S.F.S., in April of this year. We submit that the analysis contained in those comments is correct and should be followed.

D. Trade-offs.

The discussion of the cost of wilderness, in terms of lost resources and foregone opportunities is overly optimistic, fragmentary and misleading. These deficiencies are magnified by the economic analysis, which fails to mention minerals, air quality regulations (particularly prevention of significant deterioration) or the impact which wilderness designation will have on the way permitted activities must be conducted in areas adjacent to wilderness areas. Because of the generally pro-wilderness tone taken in these Draft Statements, the economic and social impacts will actually be far greater than is indicated by the Draft EIS's.

RMOGA suggests that the Final Environmental Impact Statement include a section which discusses wilderness-related trade-offs in some detail and includes a list of trade-off questions, similar to those listed on the following page. This section should be incorporated into Part V, Effects of Implementation, pages 33-66 of the National Programmatic Statement, and in similar sections in each of the state supplements.

E. Further Planning.

"Further Planning" is a misnomer. The term suggests that additional studies will be conducted in all areas where "insufficient data, a high degree of controversy, or complex mitigating factors require additional analysis before a decision can be reached." (National Programmatic, page 72) However, current Forest Service policies prohibit precisely the kind of mineral information gathering that is critical to resolving these impasses. There has been no indication that these policies will be revised in accordance with the needs of modern mineral exploration, or with the way modern mineral operations are conducted.

For those areas which do end up in the "Further Planning" category, the Final Environmental Statement must clearly state which exploration and development activities will be permitted, which will be forbidden, and what the rationale is for each decision. (We note here that the operator must be allowed to develop what he finds. Exploration costs many millions of dollars, and very few operators will be willing to risk this kind of capital without some assurances that their investments may be recouped from their discoveries.)

Finally, and most importantly, the further planning category must be kept to an absolute minimum. Local, state and national economies have already been hit hard by the withdrawal of millions of acres of our most productive public lands for purposes of wilderness "study." While it costs certain sectors of our population little or nothing to have these areas locked up for several more years while they are "studied" further, other sectors of the population are not so fortunate. The Forest Service's responsibility is not merely to protect the surface to a degree which satisfies the extreme environmentalists. It also has a responsibility to foster mineral exploration and development and to address the needs of the people who depend on the public lands for their livelihood--namely, farmers, ranchers, timber companies, mineral industries and all Americans who need the energy, non-fuel minerals and other resources which our public lands contain.

Dr. Cutler indicated recently that as much as 50 percent of the 62 million acres inventoried by RARE II could end up in "further planning." To continue withholding this much of our public lands from multiple use is unjustified, intolerable and illegal. At the very most, no more than 5-10 million acres should be recommended for further study, and no more than 5 million acres should be placed in the wilderness category. The rest of the RARE II lands must be released immediately from all further consideration and returned to multiple use management.

F. The DES Economic Analysis.

As already suggested, the economic analysis contained in the Draft Environmental statement is seriously deficient. RMOGA calls your attention to what it believes are the three most glaring problems.

1. The impacts on mineral exploration and development are totally ignored. The only inputs and outputs included in the regional and national models and statements are those concerning timber, grazing and recreation. There is great mineral potential in the areas being considered for wilderness designation; the costs of closing these areas to mining and petroleum must be included in order to assess the true resource cost of wilderness designation.

2. The economic effects of wilderness designation are distorted. The positive economic effects of releasing one area to multiple use are combined with the generally negative impacts of wilderness designation and management. This masks the negative economic costs of wilderness. As a result, the Forest Service concludes that Alternatives B through I will result in positive economic and employment effects in the short term, and that all alternatives except J will result in positive employment effects over the long term. These conclusions would change drastically (1) if mineral-related impacts were also included and (2) if the "net" or "input-output" economic model were replaced with some other model.

3. The presentation of the economic analysis is itself misleading. The economic impacts are presented as facts, when in actuality they are merely projections and assumptions. The validity of these projections depends on the accuracy of the data base and the methods used to develop the projections. Generally, regional models are inadequate. State economic planners have been working for years to develop accurate regional models which adequately reflect the complex economic relationships and interactions involved. They have not been totally successful. Now, however, the Forest Service is saying that over a period of only several months it has succeeded where the state planners have failed. The DES must explain the model, the problems associated with the model, the data base and the inadequacies associated with that data base.

VI. ADDITIONAL COMMENTS

Page 2. The discussion of NEPA should be expanded to include specific language from the act. (See above, page 2)

Page 6. A table should be inserted to summarize, on a state-by-state basis for all 50 states, the current situation with regard to national parks, the National Wilderness Preservation System, RARE II, the National Wildlife Refuge System, congressional wilderness studies and the upcoming BLM wilderness review. The overall public lands situation for the major federal land management agencies should also be summarized.

Pages 11-13, and Appendices A through C, are excellent and stand in marked contrast to the coverage given minerals and economics.

Pages 33-66. The adequacy of Part V, Effects of Implementation, is spotty at best. Many sections need a thorough reworking in accordance with RMOGA's comments.

Page 36. The discussion of air quality fails to mention or assess the potential impacts of air quality regulations on state and local economies.

Page 37. The section on recreation should discuss the need to set aside some of the high quality RARE II scenic and wildlife areas for family-type recreation, to relieve the overcrowding in our national parks, and to provide non-wilderness opportunities for the elderly, the handicapped, and those who simply do not desire a "wilderness experience."

Pages 47-49. The minerals and energy section is totally inadequate and in many ways simply incorrect. Merely reciting the number of areas which may have high mineral potential (pages 47-48 and 64-65) says nothing about which areas have potential, what the dollar value of that potential is, or which minerals are or may be present in each individual RARE II area. Other problems with this section have already been discussed.

Page 49. Other acts, besides the Resources Planning Act, also have an important bearing on the RARE II process and should be discussed. At a minimum, these would include the Mineral Leasing Act, Mining and Minerals Policy Act, Federal Land Policy and Management Act and National Environmental Policy Act.

Pages 51-59. The absence of any reference to minerals is inexcusable in the discussion of economics, inflation, balance of payments, returns to the treasury, land acquisition and social impacts. Of particular concern to RMOGA is the statement (page 56) that the goals of air quality maintenance, controlled growth and preservation of outdoor recreation opportunities "are best achieved through allocation of the roadless areas to wilderness." This assumption is totally unsupported and reflects its authors' pro-wilderness biases and lack of training in minerals, economics and public land use. (It may be appropriate for the Forest Service to put some objective people in charge of completing RARE II.)

Page 60. The emphasis on "critical minerals" (page 60 and elsewhere) needs to be balanced with an emphasis on other minerals. Many "critical minerals" are in short supply simply because they are not found anywhere in the United States. Many other minerals, also imported, are present in relatively large quantities on the public lands. Development of these minerals is also important, as it will reduce our balance of payments deficits, support many local and state economies, provide stable sources of supply, and perhaps even allow for some exports.

Mr. John R. McGuire
September 26, 1978
Page 11

Page 71. The section entitled "Consultation With Others" does not mention that the input of those consulted was often ignored in the drafting of the DES's and the development of RARE II policies and guidelines. Apparently, the decisions were made prior to any consultation, and only those remarks which fit into the policy-maker's preconceived notions about how RARE II should be run were accepted.

Pages 73-92. The first three appendices are excellent. However, the discussion of values of the roadless areas is incomplete in the absence of similar appendices which review in detail the mineral potential of each individual tract.

Page 93. It is curious that the discussion of "accessibility and distribution" fails to note that the vast majority of inventoried roadless areas and designated wilderness areas are located far from the nation's population centers. Especially in view of the reliance most western states have on the public lands, and the wilderness advocates' premise that more wilderness is needed for all Americans, the matters of accessibility and distribution deserve far more discussion than they receive in the Draft Environmental Impact Statement.

Pages 99-102. These tables must be expanded to include the following additional sectors: Oil and gas, coal, oil shale, uranium, geothermal resources, critical minerals, industrial minerals, metallics and intrinsic minerals.

Pages 103-105. The state-by-state "economic impact analyses" do not cover mineral-related impacts. This fact is not apparent to anyone who lacks an intimate knowledge of how these analyses were developed.

Glossary. Numerous key concepts and terms used in the DES are not included in the glossary. Examples include: "resources" and "reserves" (the two terms are not interchangeable); "critical mineral"; explanations of the various terms used in the DOE assessments of mineral potential; and "input-output" models.

VIII. CONCLUSIONS

RMOGA agrees that the nation needs to reduce its energy consumption. However, conservation alone is not and cannot be the answer to our energy problem. The United States must also lease more acreage and actively encourage exploration for and development of new oil and gas resources, especially during the next 30 years, while we convert to alternative energy sources. Only in this manner can we reduce our dangerously high level of oil imports.

Mr. John R. McGuire
September 26, 1978
Page 12

Wise land use decisions cannot be made in the absence of factual tract-specific information on oil, gas and other minerals. Every decision by the Forest Service regarding interim management for ultimate recommendations to Congress must consider the possible minerals present, the quantities involved, methods proposed for finding and developing the deposits, and basic realities of mineral formation and location. The RARE II inventoried roadless areas are "frontier" areas. It is much too early to state with any degree of certainty that specific areas do or do not have viable mineral deposits. However, many areas do have mineral potential. These areas must not be recommended or designated as wilderness until they have been carefully explored and the deposits developed. These exploration-production activities will not foreclose the wilderness option, because laws, regulations and self-imposed industry practices will protect the land's wilderness qualities. Wilderness designation, on the other hand, will preclude all mineral options.

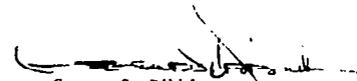
For these reasons it is essential that the Forest Service let the petroleum industry demonstrate, by actual test drilling, that the RARE II lands do or do not contain oil and gas resources in the quantities estimated by RMOGA. The only other alternative available to the Forest Service is to immediately drop from any further wilderness consideration all inventoried areas which RMOGA estimates have hydrocarbon potential.

In conclusion, RMOGA hopes that in carrying out your RARE II responsibilities, you will carefully consider the important role which minerals and the public lands play in the economies of local communities, western states and the nation, and the serious social and economic consequences which will inevitably flow from careless decisions on these roadless areas.

Thank you for your attention to these serious matters.

Sincerely,


Jack G. Swenson
Executive Vice President
and General Manager
Rocky Mountain Oil & Gas Assn.


George S. Dibble
President
Rocky Mountain Oil & Gas Assn.
Vice President
Husky Oil

GSD:mm

IMPORTANT TRADE-OFF QUESTIONS

Before any final decisions are made on the Alaskan lands, answers to the following questions must be found:

- * What minerals and other resources are we going to be giving up? In what quantities?
- * How badly needed are these particular resources? Will they otherwise have to be imported? In what quantities and at what cost?
- * How seriously will an area's wilderness quality be impaired if mineral exploratory and development operations are conducted? What mitigation measures are available? To what degree can the land be reclaimed afterward and over what period of time?
- * How will mineral assessments be conducted after 1983? Can we afford to give up the minerals that would have been discovered after 1983, had an area not been designated as wilderness?
- * What are the social and economic consequences -- to jobs, balance of trade, and consumer prices -- of locking up the domestic minerals and having to rely on imports or go without? Are we willing to accept these consequences?
- * How large a no-development "buffer zone" will air quality regulations place around each wilderness area? What additional adverse impacts will this have on local, state and national economies?
- * What will happen to the state, county and local tax base, and to what extent will eastern and midwestern states be able to make up for these losses through increased "payments in lieu of taxes" under the Federal Land Policy and Management Act?
- * What will happen to privately owned lands which are surrounded by wilderness, and how will the landowners be compensated for the loss of their lands or their access routes to their lands?
- * How much designated wilderness do we really need in view of current use patterns for wilderness? What proportion of the RARE II lands should be utilized for non-wilderness recreation and other activities which are not permitted in wilderness areas? How much more wilderness do we need in a particular state or region?
- * How will the elderly, infirm or handicapped be able to get into these wilderness areas to see wildlife and scenery which do not exist in other national forest areas?
- * To what extent will ranching and grazing operations be impaired, because ranchers will no longer be able to mend fences by mechanical means, haul equipment by truck, install or improve stock watering ponds, round up their herds using motorized equipment, or even increase the size of their herds? What effect will this have on beef prices, for example?
- * How many small ranching, mining, timber cutting, oil and other business operations will be forced to shut down because of wilderness designations?
- * Is immediate wilderness designation really necessary to protect these lands?



Government Relations
PO Box 435
Starling, VA 22170

Chief of Forest Service
John McGuire
Washington, D.C. 20250

Subject: RARE II Lands

Dear Mr. McGuire,

Oh how will we compromise? Oh to harmonize? Will we compromise again and again? With these questions being brought to the front on RARE II, we must reassess what has been taking place.

In 1971 the Forest Service implemented a program identified as RARE I which was to identify those roadless areas in the United States with more than five thousand (5000) acres.

The Forest Service is in the process of their land use plans with many already completed and the Renewable Resources Act of 1974 in process with reviews every ten (10) years.

In 1977 Rare II was implemented when Assistant Secretary of Agriculture, Ruppert Cutler, issued instructions to the Forest Service changing the criteria of Congress's original intent when they passed the Wilderness Preservation Act of 1964.

If lands are designated wilderness, an exclusive use area, which will not include a renewable resource, area economies, lumber for housing, timber revenues returned to counties, potential mineral resources, energy independence, wildlife, control of insects and fire, it all adds up to a lost column.

Many members of the Associations have personally visited, reviewed, driven, and ridden over many of these areas.

MIMEO
88495

WESTERN TIMBER ASSOCIATION

FILE
2.67251

211 SUTTER STREET, SAN FRANCISCO, CALIFORNIA 94108

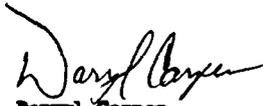
September 27
1978

RPA program goals and protection of dependent
communities should be given major consider-
ation in RARE II recommendations; we pre-
sent our proposal.

It is beyond comprehension why anyone would want to put a picket fence around the heart of our National Forest as they have put up the Bamboo and Iron Curtain in China and Russia.

Our compromise is without exception; NO MORE WILDERNESS.

With all the Congressional Laws governing the National Forest Lands, we will support the Alternative B and let the Land Management Plan do what it was intended to do.



Darryl Carper

Director/Land Matters Chairman

United Four Wheel

Drive Associations

1630 S.E. Tudor St.

Albany, Oregon 97321

September 27, 1978
File No. 2.67251

Mr. Zane Smith
Regional Forester
Forest Service, USDA
630 Sansone St.
San Francisco, Ca 94111

Dear Zane:

It is our understanding that responses to the RARE II draft environmental statement should include comments on the alternatives, criteria, and individual inventoried areas. The Western Timber Association position will be provided by this letter.

Western Timber Association consists of 39 companies with manufacturing operations wholly or partially dependent on the National Forests of California for raw material. Our members provide employment for about 20,000 people directly and contribute nearly \$230 million in payrolls annually.

ALTERNATIVES

None of the alternatives presented in the draft environmental statement represents our position adequately. Alternative E comes closest in terms of the maximum acreage which could be added reasonably from California to meet RPA Program wilderness goals, but areas were recommended for Wilderness in this alternative which are vitally important to local economies and individual mills. Specifically, these are the Little French Creek (5-228), Siskiyou (5-701), and Kangaroo (5-703) areas. In addition other areas recommended for Wilderness in Alternative E would have substantial adverse impact on existing recreational opportunities or potential recreational developments. These areas include Trabuco-Hotsprings (5-013), San Mateo (5-015), Ishi (5-098) and Sheep Mountain (5-307).

CRITERIA

Apparently the seven criteria listed in Chapter VII will be used in developing the final recommendation. Since this decision already has been made, the request for public comment seems superfluous. However, we would like to offer our views on the relative importance of each suggested criterion.

The 1975 RPA program targets should be a major consideration in the allocation of inventoried areas. The 2020 goal for Wilderness

Mr. Zane Smith
September 27, 1978
Page 2

should not be exceeded until other resource output goals in the program are met, and then only when Wilderness benefits obviously outweigh the foregone benefits potentially available from other resource development and use.

Another major consideration should be the protection of communities dependent on National Forest resources. Such protection should be guaranteed in the final recommendations.

General public agreement on individual areas should not be a driving criterion in the decision process. Public participation should serve primarily to assure full consideration by the Forest Service of all facts and options pertinent to the decisions to be made. The formally taken positions of elected governmental bodies are the only ones appropriately considered representative of the public. The Forest Service must strive to achieve the goals developed or accepted by the Congress by the application of professional judgement.

National issues should be considered primarily where critical mineral or energy supplies, or substantial timber volumes are found in inventoried areas. The need to advance the National economy should be the basic criterion, and inventoried areas needed for this purpose should not be recommended for Wilderness.

From a physical standpoint, the use of landform, ecosystem, wildlife, and distribution criteria seems the most logical as they are objective and measurable. However, these should not take precedence over meeting RPA program goals other than Wilderness, protecting dependent communities, and advancing the local economy. The wildlife criterion should be based on wildlife species dependent on wilderness conditions, i.e. little human encroachment, rather than continued use of the totally unprofessional approach of wildlife associated in the public mind with wilderness. The public generally does not understand which wildlife species need wilderness conditions. In reality, none of the so called wilderness species need classified Wilderness Areas. They do quite well, for example, in timber harvest areas where human entrance is reduced after harvesting.

The Wilderness Attribute Ratings should be used to identify high quality areas but they should not be the basis for the final recommendation.

The decision criteria also should consider the existing Wilderness System and the extent to which other Federal lands may contribute to the system.

The National Grasslands should not be considered for inclusion in the Wilderness System.

AREA RECOMMENDATIONS

Our recommendations for disposition of specific inventories areas will be found on the attached table. These recommendations and the

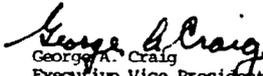
Mr. Zane Smith
September 27, 1978
Page 3

accompanying comments are based on information received from our members or cooperating groups. In all cases it was provided by local people, primarily professional foresters, who had personal knowledge of the areas.

Areas not listed should be considered as having a nonwilderness recommendation. All areas which we believe would be appropriate additions to the Wilderness Preservation System or those areas where further planning would be helpful have been listed. In summary, we recommend inclusion of about 93,000 acres in Wilderness, 175,000 acres in further planning, and 5,959,400 acres in nonwilderness.

We appreciate the opportunity to participate in the RARE II decision process and hope that the information provided and the views expressed herein will be given consideration appropriate to the people represented.

Sincerely,


George A. Craig
Executive Vice President

GAC:hr
Attachment

WESTERN TIMBER ASSOCIATION
RARE II RECOMMENDATIONS

National Forest	Area No.	Area Name	Wilderness	Nonwilderness	Further Planning	Boundary Adjustment	Remarks	
Klamath	5-069	Tom Martin		X			All areas listed for the Klamath National Forest have substantial timber resources and are critical to dependent communities.	
	5-070	Kelsey		X				
	5-068	Johnson		X				
	5-067	Grider		X				
	5-702	Indian Creek		X				
	5-703	Kangaroo		X				
	5-704	Condrey Mtn.		X				
	5-074	Portugese		X				
	5-081	Russian		X				
	5-077	Snoozer		X				
	5-079	Orleans Mt.		X				
	5-701	Siskiyou	X	X		X	Allocate in accordance with attached plan.	
Six Rivers	5-248	Monkey		X			All areas needed to sustain timber dependent communities.	
	5-707	N.Fk.Smith		X	X			
	5-252	Salt Creek		X				
	5-309	Mt. Lassic		X				
	5-310	Pilot Creek		X				
	5-308	Board Camp		X				
	5-250	North Fork		X				
	5-251	Soldier		X				
	5-247	Kelly		X			Areas 250, 251 include private ranches.	
Shasta-Trinity	5-237	Underwood		X			Needed to support timber dependent communities.	
	5-222	Cow Creek		X				
	5-221	Chinquapin		X				
	5-228	Little French Creek		X				
	5-230	Kettle Mtn.		X				
	5-219	Castle Crags		X				
	5-233	Pattison		X				
	5-229	Mt. Eddy		X				
	5-231	Mt. Shasta	X	X		X		233 contains needed manageable deer winter range. Developable ski area also much timber in 229. Implement F.S.proposal less 400 acres for ski area relocation for 231.
		5-227	East Girard		X			
	5-238	West Girard		X				
Mendocino	5-141	Thatcher		X			All areas needed to support timber dependent communities in the area; most are used now by ORV enthusiasts.	
	5-140	Elk Creek		X				
	5-280	Skeleton Glade		X				
	5-145	Big Butte-Shinbone		X				
	5-139	Thomas Creek		X				
	5-137	Wilderness Contiguous		X				
		5-144	Snow Mountain	X	X			X

National Forest	Area No.	Area Name	Wilderness	Nonwilderness	Further Planning	Boundary Adjustment	Remarks
Lassen	5-098	Ishi		X			Extensive ORV use with roads present in 5-098, Ishi.
	5-093	Wild Cattle Mtn.		X			
	5-096	Heart Mtn.		X			
	5-094	Cub Creek		X			
	5-100	Butte Mtn.		X			
	5-099	Chips Creek		X			
Plumas	5-168	Bucks Lake		X			
	5-170	Grizzly Peak		X			
	5-172	West Yuba		X			
Tahoe	5-261	Granite Chief		X	X	X	5-261, Granite Chief, put area south of ORV closure line into nonwilderness; balance to further planning; potential ski site.
	5-259	Duncan Canyon		X			
	5-262	N.Fk.American		X			
	5-265	NFK MEK American		X			
	5-264	East Yuba		X			
	5-260	Grouse Lakes		X			
	5-901	Bald Mtn.		X			
Eldorado	5-024	Salt Springs		X			
	5-982	Dardanelles		X			
	5-023	Pyramid		X			
Stanislaus	5-256	North Mountain		X			Contains needed timber. Water development site in 258. Too small; not a good addition to Emigrant Wilderness. Contains needed timber. " " " " " " Area too small and low quality. Area west of Alpine County line to nonwilderness to make needed timber available; remainder to further planning. Contains needed timber. Contains potential ski site and other recreational opportunities.
	5-258	Tuolumne River		X			
	5-810	Cherry Lake		X			
	5-811	Bell Meadow		X			
	5-812	Waterhouse		X			
	5-813	Eagle		X			
	5-814	Dome		X			
	5-815	Night		X			
	5-986	Carson-Iceberg		X	X	X	
		5-985	Raymond Peak		X		
	5-255	Mt. Reba		X			
Sierra	5-047	San Joaquin		X	X	X	Inyo portion and east of N.Fk.San Joaquin to further planning; area west of N.Fk. San Joaquin to Nonwilderness. Area has substantial timber volume needed by dependent communities.

Western Regional Council

September 29, 1978

Mr. John R. McGuire
Chief, Forest Service
U. S. Department of Agriculture
P. O. Box 2417
Washington, D. C. 20013

Dear Chief McGuire:

The Western Regional Council, a coalition of chief executive officers of major companies operating in the Intermountain West, recently contracted for a nationwide public opinion survey on the attitudes of Americans toward the use of publicly owned lands. WRC believed that such a broadly based sampling of public opinion was essential on this critical issue to avoid having the public comment process dominated by the voices of special interests. This letter and the attachments include the results of the survey. They are being submitted formally for the record of the Roadless Area Review and Evaluation process presently ongoing within the Forest Service.

The individual companies that compose the Western Regional Council have worked actively to assist in the RARE II and BLM review processes since their initiation. As developers and users of the natural resources primarily within the public lands states, WRC member companies have been actively involved with wilderness issues. While recognizing that the public supports preserving the environment and curbing industrial pollution, WRC believes that the public must better understand wilderness and the restrictions placed on lands so designated.

We are particularly concerned with determining the public's attitude with respect to the trade-offs between preserving the environment and improving the nation's economy. Furthermore, as users of the public land, we recognize the necessity of the public

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National Forests (Cont'd)	Area No.	Area Name	Wilderness Areas	Normal Management	Further Planning	Boundary Adjustment	Remarks
	5-296	Byronoma Springs		X			Very low quality. 244 & 295 contains timber needed by dependent communities. Generally low quality with recreational resource predominates. 199 & 200 contains timber needed by dependent communities. Too small and low quality for 201. Has ORV use for 212. All remaining areas on the Sequoia contain timber needed by dependent communities.
	5-244	Timber Lake		X			
	5-295	Woodchuck		X			
	5-198	Kings River		X			
Sequoia	5-199	Agnew		X			
	5-200	Jerride Lakes		X			
	5-201	Kings Canyon		X			
	5-212	Scotts		X			
	5-206	Woodpecker		X			
	5-213	Woodstave		X			
	5-214	Hill Creek		X			
	5-215	Greenhorn		X			
	5-029	South Sierra		X			
	5-204	Black Mtn.		X			
	5-205	Slater Mtn.		X			
	5-207	Domeland Additions		X			
	5-208	Rincon		X			
	5-209	Carroll		X			
	5-210	Chico		X			
	5-211	Lyon Ridge		X			

Western Regional Council

Mr. John R. McGuire
Page Four
September 29, 1978

maintaining a healthy and active economy. In this regard, we cannot overemphasize the importance that public attitudes as reflected in the nationwide survey should play in determining the allocation and establishment of priorities in the future use of the public lands within the western states. In this sense, we hope this survey will be of benefit to the Forest Service, to the BLM and, ultimately, to the Congress.

In addition to this letter, we are providing a copy of the memorandum prepared by Yankelovich, Skelly & White for the Western Regional Council, the questionnaire used in the survey, and the complete printout of results. We hope the Forest Service and other interested groups will analyze this data and arrive at conclusions similar to our own.

Respectfully submitted,


James C. Wilson
For the Board of Trustees

RUSTEES

the Board
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The Western Regional Council is a coalition of western business interests organized to provide a common voice in the business community in the Intermountain West. Its membership, composed of chief executive officers of corporations doing business within the mountain states, seeks to establish a balanced view point between economic development and ecological preservation. Its objective is to recommend policies to national, state and local governments which will enhance the quality of life of the people of the intermountain region recognizing the need for a safe and clean environment in which to live as well as the need for a healthy and active economy. The Council works to promote maximum freedom of business and industry in the conducting of their affairs consistent with the well being of the community as a whole, and provides a forum for the resolution of business and industry problems on a regional basis.

Since its inception in September, 1977, the Western Regional Council has contributed to the development of a diverse range of issues. Through its efforts, a high terrain variance to the 1977 Amendments to the Clean Air Act was achieved, providing for a more reasonable approach to the attainment of clean air in the high altitudes of the western mountain states. Additionally, the Council has prepared numerous issue papers on coal, wilderness, mining law reform, water, Federal Indian policy, copper stockpile legislation, the development of oil shale, and regulatory reform. Papers on Federal Coal Leasing Policy and National Park Wilderness are presently under preparation.

The Council has worked closely with the Western Governors on copper stockpile legislation, Indian policy, the development of "new source performance standards" to the Clean Air Act, and through the Western States Water Council, has helped develop the western region's response to the Carter Administration's Water Policy Review. Also, with the Western States Water Council, the Western Regional Council has worked toward an attempt by the Western states to quantify federal reserved rights.



Western Wood Products Association

1500 Yeon Building Portland Oregon 97204 Area Code 503/224-3930

September 28, 1978

Mr. John R. McGuire, Chief
Forest Service, U.S.D.A.
P. O. Box 2417
Washington, D. C. 20013.

Subject: Comment on the RARE II Draft Environmental Statement
June 15, 1978

Dear Mr. McGuire:

Western Wood Products Association is a regional organization of lumber producers in the Western United States. Our members and grading subscribers produce approximately 45 percent of the softwood lumber production in this nation. The industry members that we represent are wholly or partially dependent upon the continued availability of national forest timber. Further, these member firms are made up of individual people who rely heavily upon the national forest system for their personal and community economic well-being, their water supply and their outdoor recreation opportunities.

The general feeling of our membership regarding the total RARE II process and the Draft Environmental Statement can best be summed up this way: The RARE II process must be completed equitably, decisively and expeditiously. Most of the areas involved in the subject inventory have been studied and kept in a state of suspension far too long. The Forest Service has the knowledge and professional expertise necessary to proceed with the management of these lands. We feel that strong direction is needed from the leadership of the Forest Service to stop all this travail and start doing the job of providing the greatest benefits to the greatest number of people in the long run.

The Draft Environmental Statement has many weaknesses primarily in three general ways: 1. Organization of format. 2. Lack of consistency. 3. Clarity of expression and omissions.

The net result is a programmatic statement and supplements that are not well understood by most people who are concerned enough to make the effort to read them. However, in recognition of the fact that the task is monumental within the necessary time frame and that the documents are, after all just a draft statement, we believe that the Forest Service is complying with NEPA and other laws - at least up until this point in time.

FOREST SERVICE
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OFFICE OF THE CHIEF

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Mr. John R. McGuire
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If there is a present gap in this project between the law and Forest Service performance, it is in the compelling need to conduct RARE II more in conformance with the Resources Planning Act. In this regard we are referring to the accountability and land use planning coordination aspects which need to be greatly strengthened. Please understand that our emphasis on RPA does not imply any "whole cloth" endorsement of the 1975 Program Goals pursuant to the Act. We are firmly convinced that the present timber program is based upon an assessment that is unrealistically conservative and also that the wilderness goal of 25 to 30 million acres is higher than this country can afford in view of other certain demands that will require more intensive use of much of this land to benefit greater numbers of people.

As the RARE II issue has been discussed there has been much unjustified criticism of the Forest Service because the DES Alternatives presented tend to reflect the obvious need to satisfy a significant share of strong and steadily increasing commodity needs of this nation. The Forest Service is not displaying any antiwilderness bias. Any rational analysis of future demands upon the remaining roadless national forest land base will reflect the ever strengthening need for the optimum outputs of goods and services that these lands can produce in perpetuity.

Last year you directed the Experiment Station to conduct a study testing the theory of Kurt Kutay* that reallocation of roadless area development funds to intensive management would replace potential harvest losses from withdrawal of those areas. That study by Roger Fight et. al. (1978) clearly disproves Kutay's contention and the subsequent partial economic analysis of Randal O'Toole which was based upon Kutay's work. It is time to stop all this nonsensical academic exercise about having substantial limited use tradeoffs and still satisfying a fair measure of all other public demands simultaneously. It is not possible.

Quite obviously the trend of the future must be the reverse of special areas for limited use such as wilderness. Plainly, there is no great pool of land anywhere in this country that remains to be "allocated." The unprofessional and irresponsible release of erroneous RARE II update RPA baseline data last week hit a new low in communications that is making it very difficult, if not impossible for most publics to understand our national renewable resource situation in relation to the roadless areas. The timing of the release one week before the close of the RARE II comment period makes it appear that the Forest Service is attempting to influence the outcome of its own public involvement exercise.

Now that much debate on RARE II has taken place it is clear that a "preferred" alternative should have been presented in the Draft Environmental Statement. The absence of a proposed action has made it difficult for many concerned citizens to focus on the issue and therefore provide the Forest Service with meaningful input. The net effect of this passive decision was to accelerate

*Kurt Kutay, "Oregon Economic Impact Assessment of Proposed Wilderness Legislation", April 1977.



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polarization toward hard bargaining positions and to erode public confidence in the Forest Service as a professional land managing agency. It is of the utmost importance that the final environmental statement make clearly understandable and specific recommendations as to which lands should be included in the National Wilderness Preservation System and which lands should be immediately available for nonwilderness uses. Recommendations of specific areas to be studied further should be justified on an individual basis in the final statement and kept to an absolute minimum extent in numbers and land area.

The DES has some other shortcomings which should be corrected in the final environmental statement:

1. Economic and social impacts in the DES should have been presented on an individual area and multi-county unit basis.
2. The range of alternatives presented was inadequate as evidenced by emerging wilderness lobby and commodity group alternatives. There most certainly should have been an alternative which would have clearly expressed potential and programmed resource outputs with wilderness constrained at the minimum RPA goal of 25 million acres.
3. The potential benefits of program emphasis on developed site recreation should have been thoroughly illustrated and described in the DES so that nonwilderness recreationists could distinguish their own best interests.
4. Commercial forest land that was placed in "deferred" category during RARE I should have been considered in the DES as a resource tradeoff on potential wilderness classifications to truly reflect opportunity costs that would be experienced.

We are concerned with the manner in which the Forest Service has approached RARE II. There is too narrow a focus concentrating upon wilderness values at the expense of all other values. Wilderness is a multiple use only to the extent that it is the highest and best use for a specific area and in balance and harmony with all other resource uses for which there is public demand and sustainable supply. It is patently silly and dogmatic to insist that wilderness is a multiple use just because the Multiple Use-Sustained Yield Act of 1960 states that wilderness is consistent with the purposes of that Act. If the Forest Service considers inputs that simply state a preference for "multiple use" to be unresponsive, a considerable bias will be imposed on the analysis of public comments. It should be obvious that many people are not aware of the legal distinction being drawn here and it should be equally obvious that when people write the Forest Service supporting "multiple use," they don't mean wilderness. The Forest Service needs

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to do a better job of public education so that various publics will understand the legalities but midway through a public involvement program is not the time to start.

It has also become apparent during the course of RARE II that the Forest Service has changed emphasis in their approach to wilderness diversity. Early on there was some token recognition of what other federal lands were likely to contribute toward "rounding out the System." Now, efforts seem to be redirected toward a new goal of making the national forest contribution to the total System as diverse as possible regardless of the characteristics of other federal lands certain to be included. Forest Service vision should not stop at the forest boundary. Extensive areas of the federal lands are destined to be included and they should be considered part of the total picture. Also, inventoried RARE II roadless areas of types that are known to be overrepresented in the existing Wilderness System should be dropped from further consideration for wilderness even though they may be otherwise suitable for inclusion.

Of all seven decision criteria presented the achievement of 1975 RPA targets is placed first and rightly so because this is of the utmost importance to the success of the entire Forest Service Program. As was indicated earlier in this letter, we do not necessarily agree with the goal levels of the Program - particularly the wilderness goal which is too high even though the Forest Service termed it "moderate" in the last assessment. What concerns us most is the inappropriate emphasis on overachieving the wilderness targets when all other resource systems are barely approaching the lower levels indicated in the Program. The illogic of the situation is that inflation of the Wilderness goal will impede realization of all the other goals. It seems so incongruous for a public agency with a multiple use charter and mandate to be so intent upon frustrating their own mission by this fixation on the dominant use of Wilderness.

The second criteria intended for use in making these crucial decisions involves the concept of "consensus." Idealistic, but of very little real, practical value. It is axiomatic that any question raised for public discussion will be debated. The Forest Service is well aware that controversies concerning the limited use of public lands have been going on for generations - longer than the Service itself. We think that this "decision criteria" should not be used at all in RARE II because it will tend to postpone decision making on controversial areas (most of them). Also, this criterion will lend nothing toward the disposition of those few noncontroversial areas which should be obvious where there is nothing worth debating. The Forest Service has a difficult problem of proprieties in the solicitation and use of public comments since their responsibilities are not political in nature but professional and properly so. The marching orders of the Forest Service come from laws passed by Congress and signed by the President rather than from straw polls.

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Community stability and employment are obligations of the Forest Service to those citizens who live within the sphere of influence of the national forest system - and this includes everyone in the Western United States. This means that these economic and social considerations are decision criteria of the utmost importance. We are very concerned that the significance of this criterion is being minimized by economic theorists in the Forest Service as I expressed to you in my letter of August 24, 1978 (copy attached hereto).

National issues involving high potential resources are exceedingly valuable for use as decision criteria and should be fully utilized within the context of the RPA program and augmented by all of the latest available information on supply, demands and national policies.

While variety is a valid consideration in adding land to the NWPS it apparently does not deserve the high priority of some of the other criteria mentioned. The public response in Phase I of Rare II reflected general lack of interest in these land characteristic factors. No doubt there would have been less interest shown if more publics were apprised of the extensive representation of ecosystems and landform already set aside in existing research natural areas, geologic and scenic areas, botanical areas, parks of all jurisdictions and wilderness areas. Generally, scientists shun wilderness areas for research purposes because of the lack of efficient access and constraints upon installation of man-made devices. In fairness, it should be added that social scientists are an exception since wilderness makes opportunities to study human behavior in isolation from man's ordinary environments. West of the 100th Meridian accessibility to existing wilderness is very good in most states and should not be a consideration. The most inappropriate element contained in this criterion is the approach to wildlife in wilderness. It is generally conceded among knowledgeable people that there are virtually no species of wildlife truly dependent upon classified wilderness as managed by the Forest Service. Some species of animals and plants are sensitive to certain kinds of human induced disturbance of their habitat but these situations are manageable if recognized without wilderness classification of the subject area. Indeed, most wildlife habitat and populations can be enhanced by positive management measures which are inhibited or prohibited by the imposition of formal Wilderness upon the land in question. The idea of giving serious consideration to recommending areas for wilderness because of the presence of wildlife which the "public" perceives to be associated with some vague wilderness image is like stepping through the Looking Glass. This approach opens up whole new worlds of Never Never Land where an entire system can be conjured up based upon a Forest Service dream of what your social scientists think that the illusory "public" thinks. Let us leave this mystical realm to the tarot card readers.

The Wilderness Attributes Rating System is a secondary criterion which may be of some assistance in confirming that a few very high or low quality areas should or should not be recommended for Wilderness designation. It



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seems to us that WARS is far too arbitrary and indefinite to be of much use with the bulk of the inventoried areas which have a multitude of complex values hanging in the balance. WARS is particularly weak to the extent that the system incorporates the variety factors discussed in the preceding paragraph of this letter.

The Forest Service rightfully relegates grasslands to a low priority as a decision criterion. Unless the RARE II process can identify some truly unique area for consideration, the grasslands should be totally excluded from further consideration as wilderness. Probably whatever unique area may be found would be better set aside in a research natural area. The BLM and Park Service wilderness review processes probably will consider deserts, prairie and other rangelands adequately.

There are many important decision criteria which should be employed in forming a proposed action in the final environmental statement that are not incorporated in the seven criteria that the Forest Service indicates in the DES that are to be used. No doubt the responses to the DES will suggest many good criteria that should be used so here are just a few of our suggestions: 1. The greatest good for the greatest number in the long run paraphrases the essence of Forest Service policy since the inception of the organization. This concept is as valid as ever and goes to the heart of these roadless area questions. - Recommendations by the Forest Service for areas of limited use that preclude the realization of other valuable public benefits must be done with great care and sparingly. 2. Only areas with unique features that are of National Significance should be recommended for Wilderness which is a National System. Areas that are not unique or are types similar to existing Wilderness should not be recommended. 3. Highest and best use of the land. It is the duty of the Forest Service pursuant to the Multiple Use-Sustained Yield Act of 1960 to be stewards of this land in public trust in a manner which will provide the optimum sustainable yield of public benefits.

The ten alternatives presented in the DES are of very limited utility in promoting public understanding of the issues involved in RARE II or in aiding reviewers to respond. As was mentioned before, there should have been a Forest Service preferred alternative in the DES as well as an alternative which held wilderness to the minimum 1975 RPA Program target.

Alternative A is not a bad choice except that "No Action" would have been better expressed as "No further RARE II" with the land management planning process to proceed on schedule to resolve these land use issues on a planning unit basis firmly tied to achievement of all the 1975 RPA Program goals. Perhaps in view of all the litigation, appeals and administrative vacillation of today, this is no longer a viable alternative but that was the way the system was intended to work in the first place. It may well have succeeded with stronger direction and support from Forest Service leadership. RARE II has the potential for turning into a delaying rather than an expediting



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approach and it will take all of the power that the Forest Service and the Secretary of Agriculture can muster to prevent this from happening.

Alternative B sounds unreasonable because it states that all inventoried roadless lands be barred from further wilderness consideration. Actually this alternative is not extreme when consideration is given to the fact that the low 1975 RPA wilderness target would be satisfied if less than one million acres were added to the NWPS from the RARE II inventory. That comes very close to being no withdrawals when 1/62 of the total inventory is taken for Wilderness. Please recall that we did not agree that 25-30 million acres was truly just a "moderate" withdrawal in the first place.

Alternative C and Alternative D are both unacceptable because their wilderness recommendations exceed RPA goals when combined with existing wilderness and Administration approved proposals. Also they both leave far too much land in the category of "further planning." Essentially these two alternatives are merely meaningless computer games without basis in facts.

Basically Alternative E has a fairly good general configuration in that it seems possible to meet RPA targets and strike a balance with a minimum of areas left in the "further planning" category. However, the tentative allocation of areas to be recommended for wilderness is unacceptable under this Alternative, particularly in the State of Washington.

Alternative F is objectionable on the grounds that wilderness variety characteristics are grossly overweighted and the number and extent of areas relegated to "further planning" are completely unacceptable.

Alternative G by comparison with C, D, F, H, and I is somewhat of an improvement in its general configuration because of the relatively smaller "further planning" area. The level of wilderness recommendations exceeds even the highest 1975 RPA target for that resource and the allocation of vital timber and mineral lands render this alternative unacceptable in every state with major RARE II area inventories. This alternative also overemphasizes wilderness variety characteristics to a ridiculous extreme far exceeding the values of such considerations.

Alternative H overrates the least significant and most artificial of all wilderness attributes devised in this largely conjectural analysis - wildlife. It is a small wonder how wildlife considerations have been twisted around in this process from Phase I when opportunities for habitat management were considered to be a reason for not establishing wilderness. Alternative H has some elements of realism due to the accommodation of more exercise of judgment by the Forest Service Regions which will be a necessary ingredient in the final proposed action but it is not acceptable because wilderness is heavily overemphasized.

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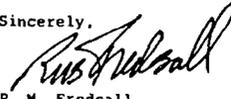
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Alternative I has the distinction of embodying practically all of the faults of Alternatives C-H in one package. It exceeds the 1975 RPA wilderness targets. It relegates an unjustifiable amount of land to the nondecision category of "further planning." It is without justification in the context of demand and supply of all nonwilderness national forest resources and is just plain terrible.

Alternative J is necessary to present some idea of the magnitude of public values that could be wasted by classification of extensive areas of Wilderness from the RARE II inventory. As a possible course of action, this alternative is absurd and the backlash from implementation of any alternative close to "J" could ultimately lead to abolishment of the existing Wilderness System.

John, in brief these are most of our basic comments on the DES. Our members have responded with detailed site specific comments on each of the roadless areas that concern us - and this includes practically every area. Now we can only hope that your computer doesn't blow more than a couple of fuses in processing the responses to this most ambitious public involvement exercise ever attempted by the Forest Service. We hope that the project generates more light than heat and comes forth with positive recommendations for all of the RARE II lands that will allow the management of the National Forest System to go forward in an orderly and efficient manner.

Sincerely,


R. M. Fredsall
Director, Resources

cm

Enclosure

cc: Members of Congress
Assistant Secretary Agriculture Rupert Cutler
Regional Foresters
Resources and Environment Committee

Conservation Committee
National Speleological Society, Inc.
1036 Winchester
Alhambra, CA 91803

Mr. John R. McGuire
U. F. Forest Service
P.O. Box 2417
Washington, D.C. 20013

Dear Mr. McGuire,

The National Speleological Society would like to express its disappointment with the Forest Service's RARE II process. Our de facto wilderness areas are too precious to our country and its people to be considered and evaluated in haste. The large amount of area proposed as non-wilderness and the small amount of areas proposed for further planning in each of the alternatives is unacceptable. We all need more time to properly evaluate these areas.

Consequently, the NSS believes a very strong showing of public agreement should be required before any area is designated non-wilderness. Once such a designation is made, we may not be able to reconsider. We must make the correct decision the first time.

We also believe no area should be eliminated from wilderness consideration unless development of the area is shown to be unquestionably necessary to meet existing national and local needs.

The Resource Planning Act wilderness goals are inadequate. Wilderness is one of our most precious resources. The NSS has an interest in above ground wilderness as it is the best means of protecting our karst lands and the underground resources which underlie them. We ask that the Forest Service set their sites higher. Arbitrary upper ceilings on the amount of wilderness we need is inappropriate as well.

We also question the use of the "Wilderness Attribute Rating System". The system presents too many individual biases. The members of the NSS urge that the so-called "wilderness attributes" do not carry greater weight than the opinions expressed by the American people concerning their wilderness areas. Too often valuable wilderness re-

sources, like those found underground in caves, are ignored with this system.

Finally, we would like to protest the exclusion of the National Speleological Society from the list of national organizations involved in RARE II. We hope in the future to be included on your mailing list. Though we are a national organization with members in every state, we received only some of the regional supplements.

Because we did not have all the supplements and due to the short time we had to review the proposals we did receive, our review of RARE II is not complete. We hope in the future to receive all the material available with the other national organizations.

Sincerely,

Louise D. Hove
Louise D. Hove
National Speleological Society
Member, Conservation Committee