

## 4. INVOLVEMENT

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### Collaboration

***1. The Federal Government should work with States to preserve roadless areas on State and private lands.***

**Response:** Management of lands in other Federal, State, or private ownerships is beyond the scope of the proposed action and the purpose and need for the EIS. Jurisdiction over other Federal, State, or private ownerships is not within the authority of the Forest Service. Through its State and Private Forestry branch, the Forest Service works closely with State officials and State Foresters to provide technical assistance, financial initiatives, and cost sharing for a wide variety of work designed to enhance natural resource conservation.

***2. The Forest Service should work to see that the good that may come from this process would not be undone by any future Presidential Administration.***

**Response:** Future Administration policy is beyond the scope of the EIS.

***3. The proposed rule should call for a Memorandum of Understanding (MOU) between the Forest Service and County commissioners because the County commissioners are the ones who are ultimately in control of the roads in their Counties.***

**Response:** Memoranda of Understanding (MOUs) with local government officials are usually prepared at the local level by Forest Supervisors and are outside the scope of the EIS. The Roadless Area Conservation Proposed Rule would prevent building additional roads in inventoried roadless areas; it does not address the Forest Service’s existing road system. The 18-month interim rule halting new road construction in roadless areas was invoked to allow the Forest Service time to analyze its existing road

system and develop a policy for more effective management. That analysis resulted in the Forest Service’s proposed Roads Policy, which includes local procedures for maintenance and decommissioning of existing Forest Service roads. County commissioners have jurisdiction over County roads; the Forest Service has jurisdiction over roads in the National Forest Transportation System.

***4. The Forest Service did not actively solicit comments from local governments, Counties, or conservation districts that have some legal jurisdiction and special expertise in determining the effects and impacts of the proposed action on economies, fire, dependency and resiliency, noxious weeds, recreation and tourism, and water. The Forest Service should collaborate with County governments, local agencies and stakeholders, and other public planning efforts, and should not refuse reasonable requests from Senators, Representatives, Governors, and County commissioners seeking cooperating agency status to participate in the development and assessment of impacts from the proposed rule.***

**Response:** The Forest Service received several requests to grant cooperating agency status. One of the first requests came from the Western Governors Association. Forest Service Chief Mike Dombeck and Agriculture Under Secretary for Natural Resources and the Environment Jim Lyons jointly responded to the Western Governors Association request indicating their support for establishing and maintaining collaborative relationships with non-Federal government partners, and describing procedures developed to facilitate such collaboration. Public comments and responses, including response to correspondence from Tribes and elected officials, were made part of the official record for this rulemaking.

***5. The Forest Service should invite the participation of affected Federal, State and local agencies. The Forest Service did not take into account the ecological and resource use factors that other agencies contribute through their management for biodiversity, ecoregions, fragmentation, size, open space, and roadless recreation. The U.S. Department of the Interior Bureau of Land Management, U.S. Department of Interior National Park Service, and U.S. Department of Interior Fish and Wildlife Service should be considered. The National Environmental Policy Act regulations at***

**40 CFR 1501.6 emphasize early interagency cooperation, and 40 CFR 1508.5 requires the Forest Service to collaborate with State or local agencies and Tribes having similar qualifications. Because this analysis is on a national scale, all agencies need to be considered for their contributions.**

**Response:** The proposed action is limited in application to inventoried roadless areas and unroaded areas in the National Forest System. Management of other lands in the National Forest System and public lands administered by other Federal agencies are outside the scope of this EIS.

Interagency cooperation was continuous throughout this rulemaking process. Additional collaboration will occur with Federal, Tribal, State, and local officials during subsequent planning and implementation efforts under the provisions of the new Planning Regulations (36 CFR 219). As required by law, policy, and regulation, formal consultation processes were established with the U.S. Department of Interior Fish and Wildlife Service, U.S. Department of Commerce National Marine Fisheries Service, and Tribal officials with treaty or trust interests on affected National Forest System lands.

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

**Response:** The 1996 Farm Bill does not speak directly to the role of local conservation districts in the development of administrative rulemaking, such as the Roadless Area Conservation rulemaking. In that sense, acknowledging or defining the roles and responsibilities of local conservation districts is beyond the scope of the EIS.

However, involvement of local conservation districts in the rulemaking process has been ensured through the public involvement and outreach process. Access to the DEIS by local conservation districts was widely available through a variety of sources. The DEIS and proposed rule were distributed to Congressional delegations, Governors, State agencies, County and municipal libraries, and individuals requesting a copy. This distribution strategy, combined with the availability of the DEIS on the Internet and at Forest Service offices

nationwide, was designed to make the DEIS documents readily available to all interested parties.

**7. The Forest Service conducted a secret inventory of the Alpine County portion of the Humboldt-Toiyabe National Forest without the participation of local citizens and County officials or proper notification. Requests through the Freedom of Information Act to find out the participants and process used in this inventory have been stonewalled. In a public meeting, a member of the Sierra Club claimed that the Sierra Club paid for the inventory.**

**Response:** The agency is not aware of any secret inventory nor of any inventories sponsored and paid for by the Sierra Club or any other organization, agency, or individual. The Forest Service conducted an inventory of roadless areas on the Humboldt and Toiyabe National Forests as part of the RARE II inventory process, which was publicly reviewed and published. The review results were reiterated, publicly reviewed, and published again in the forest plans for the Humboldt and Toiyabe National Forests. This information is public record and available by request from the Forest Service. Additional information about the inventory process is found in Response 7 in the Data section.

The Forest Service's Washington office has received about 60 requests for information and documents regarding the Roadless Area Conservation rulemaking pursuant to the Freedom of Information Act. The Forest Service responded to each of these requests.

**8. The Forest Service failed to meet the requirements of 40 CFR 1503.1 to obtain comments from any Federal agency that has special expertise with respect to any environmental impact involved or which is authorized to develop and enforce environmental standards.**

**Response:** The public involvement strategy for this rulemaking includes coordination and collaboration with Federal regulatory agencies, other Federal agencies with public land management responsibilities, and Federal agencies with natural resource management expertise. Throughout the rulemaking and environmental analysis, the interdisciplinary team and Forest Service leadership have consulted with members of an interagency team that includes oversight, regulatory, and land and

resource management expertise. The names and affiliations of the interagency team members were listed in the DEIS, p. 4-8, and are in the FEIS.

**9. *The rule should not be based on the opinions voiced by majorities at public comment meetings because the meetings were often dominated by vocal interest group members, while individuals with different views were not able to attend, stayed away, or remained silent. The confrontational circus atmosphere of the meetings made them a waste of time and resources. It is unrealistic to expect people who prefer solitude to crowds to provide meaningful input through a public meeting venue; and***

**10. *The Forest Service should listen to the majority voice at public meetings.***

**Response:** Several respondents expressed concerns that scoping, information meetings, and public comment forums on the roadless proposal were held at the convenience of a few and dominated by special interest groups, either environmental groups or commodity interests. Others believe the Forest Service should heed these majority views because they were expressed at these open meetings.

Public comment meetings were only one of several ways the Forest Service listened to the public, established a dialogue with interested persons and organizations, and collected comment on the roadless issue. The Forest Service also considered written, faxed, and electronic mail responses and responses in other media formats such as videos, charts, and t-shirts. Furthermore, analysis of public comments is not a vote-counting procedure. Every comment has value, whether expressed by a single person or by thousands.

**11. *The Forest Service should suspend the decision process until all interested parties set aside differences and provide balanced viewpoints.***

**Response:** Achieving consensus among the many diverse and conflicting interests regarding the roadless area issue is beyond the scope of the EIS. Although desirable, it is not feasible given the 20-year history of debate at both the national and local levels. Due to the magnitude of the different viewpoints expressed, consensus by all interested parties may never be reached on a national-level proposal. Nonetheless, full and public dialogue about

this proposal has taken place in order to bring about an informed decision on roadless area conservation.

## Government-to-Government Consultation

**12. *The regulations at 36 CFR 219.6(k) and 219.7 require the Forest Service to coordinate planning efforts with American Indian and Alaska Native Tribes. This coordination includes reviewing Native planning and land use policies, noting their objectives, impacts, and where they conflict with Forest Service planning; and developing alternatives for resolving such conflicts; and***

**13. *The Forest Service must consult with each affected Tribe.***

**Response:** The cited regulations refer to consultation for the development, amendment, and revision of land and resource management plans under NFMA, not to informal administrative rulemaking. Even so, the Forest Service recognizes the broad scope of this rulemaking, and has undertaken considerable efforts to consult and coordinate with American Indian and Native American Tribes.

Such consultation has occurred throughout the rulemaking. Consultation is an iterative, ongoing process. The Forest Service has consulted Tribal officials from potentially affected and interested Tribes individually or as members of multi-Tribal and inter-Tribal organizations, councils, and commissions. Tribes were proactively involved in scoping and development of the proposed rule and DEIS. Many Tribal organizations have provided written comments on the rulemaking and DEIS, as shown in letters from American Indian and Native Alaska Tribes in Volume 4 of this FEIS.

Consultation would continue to occur during forest and grassland plan revision under the provisions of the new Planning Regulations (36 CFR 219).

## Implementation

**14. *The Forest Service should notify the public of any change in the draft proposal to close, block off, or restrict access to any existing roads.***

**Response:** None of the alternatives propose to block existing public access to National Forest System

lands, nor do they propose to close any existing roads or trails. Existing rights are protected. The local responsible official may authorize road construction or reconstruction when a road is needed pursuant to reserved or outstanding rights or as provided by statute or treaty (DEIS p. 2-4).

**15. The Forest Service should address the willingness of local Forest Service staff to implement roadless protection. Forest Service employees nationwide are biased against multiple-use; and**

**16. Field employees want proper scientific management of the land, not Washington, D.C. politics – and Forest Service leadership should heed them.**

**Response:** The analysis of environmental, social, and economic effects analysis in the DEIS, FEIS, and Specialist Reports is based on and employs the best available science for land and resource management. Proper scientific methodology and analysis, not politics, are the basis of the analysis and its conclusions. Citations and references to scientific information and literature are included in the References Cited section of the DEIS and FEIS.

Opinions of Forest Service employees are outside the scope of the EIS. Forest Service employees, just as other members of the public, have opinions, values, and personal and professional views. In addition, the Forest Service is a decentralized organization that traditionally has made most decisions at the local level. Forest Service employees have expressed comments both supporting and opposing the proposed rule. However, even when they hold differing personal views, Forest Service employees are required to abide by agency regulations and policy on the job.

**17. The Forest Service should not insult citizens by suspecting they cannot use forests without destroying them.**

**Response:** The Forest Service does not claim that use will automatically destroy forestlands, resources, or values. As one response to budgetary realities and to conserve roadless area values, the agency is proposing to prohibit road building, and in some alternatives, timber harvest, in inventoried roadless areas. Other multiple-use activities may continue

unless limited through local decisions, such as forest or grassland plan direction.

**18. The Forest Service should clarify its statement in the Questions and Answers booklet, page 9, which says this proposal will prohibit construction and reconstruction in most inventoried roadless areas. Does this mean the prohibition would not cover all areas?**

**Response:** The DEIS stated that the portions of inventoried roadless areas that already contain classified roads would not be subject to the prohibitions (DEIS p. 2-3). This definition has been changed in the FEIS to apply the prohibitions to the entire geographic span of inventoried roadless areas (see FEIS Chapter 1). Chapter 2 in the DEIS and FEIS also details some exceptions to the prohibitions for reasons such as public health and safety, reserved and outstanding rights, and prevention of irreparable resource damage.

## Legal

**19. The National Environmental Policy Act regulations at 40 CFR 1502.21 require Federal agencies to ensure that materials incorporated by reference are reasonably available for inspection by reviewers within the time period allowed for comment. The DEIS references include more than 350 sources of information. The Forest Service should allow adequate time for interested parties to obtain and review information incorporated by reference.**

**Response:** All materials cited in the DEIS were reasonably available for inspection through normal library and Internet sources, as well as in the Roadless Area Conservation Project records. The same holds true for FEIS materials.

**20. The public meetings for the DEIS and Proposed Rule violated sections 553, 556, and 557 of the Administrative Procedures Act rules against ex parte communication between agency employees and interested persons outside the agency.**

**Response:** “Ex parte communication” refers to proceedings, which were conducted on behalf of one party only, as distinguished from proceedings in which one of the parties has not received notice and, therefore, is neither present nor represented. In the case of the Roadless Area Conservation rulemaking,

all notification requirements of the Administrative Procedures Act were met. These included use of the *Federal Register* (Notice of Intent, the proposed rule, and public meeting dates) and further notice of specific public meetings through publication in national, regional, and local newspapers, and on a toll-free telephone hotline and the Internet. These public meetings were open to anyone.

**21. *The DEIS does not adequately respond to concerns raised during scoping that the Notice of Intent did not give full consideration to the Alaska National Interests Lands Conservation Act (ANILCA) sections 101, 708, and 1326, which prohibit the Forest Service from considering this roads prohibition in Alaska.***

**Response:** Alaska National Interests Lands Conservation Act (ANILCA) Section 101 establishes conservation system units and expresses Congressional intent that no additional conservation units be established by legislation. The proposed rule does not seek legislation or establishment of new types of areas; rather it proposes to regulate areas already in the National Forest System and under the authority of the Executive Branch.

ANILCA Section 708 states that further review of Wilderness potential for inventoried roadless areas in Alaska (initially evaluated in the RARE II process) should be done through forest planning. It states that the Secretary of Agriculture need not undertake further Wilderness reviews of these areas. The DEIS did not review inventoried roadless areas for purposes of evaluating their Wilderness potential. Instead, it proposes conservation measures to protect roadless area values in inventoried roadless and unroaded areas of the National Forest System. The DEIS analyzed alternatives that forego building roads in lands not yet roaded, which does not represent managing or designating those lands as Wilderness. Wilderness designation remains the sole prerogative of Congress. The new NFMA Planning Regulations (36 CFR 219) assigned to forest planning the identification of and further protections for unroaded areas.

ANILCA Section 1326(b) says, “No further studies of Federal lands in the State of Alaska for the single purpose of considering the establishment of a conservation system unit, national recreation area, or for related or similar purposes shall be conducted unless authorized by this Act or by further Act of

Congress.” The roadless DEIS did not identify additional conservation system units. It proposed prohibitions and procedures for future management of inventoried roadless areas located on National Forest System lands. The prohibitions in the FEIS do not make these areas conservation system units. The decision on procedures has been made in the new Planning Regulations (36 CFR 219).

**22. *The National Forest Management Act at 16 USC 1604(d) requires the agency to provide for meaningful public participation in the development, review, or revision of a forest plan. The implementing regulations at 36 CFR 219.6(g) require the Forest Service to give the public at least 30 days' prior notice of all public participation activities conducted in connection with plan amendments.***

**Response:** This rulemaking does not mandate a forest plan amendment or revision and therefore does not violate the 36 CFR 219 Planning Regulations that implement NFMA. Nonetheless, the Forest Service public involvement strategy did include multiple opportunities for public participation. See Response 24 in this section.

**23. *The proposed rule speaks to honoring treaty rights by allowing access to roadless areas; the rule should also discuss denying access to roadless areas to honor treaty rights where access would conflict with Native American desires.***

**Response:** The alternatives analyzed in the DEIS honor existing permits, contracts, and legal instruments. Treaty rights acknowledged by the United States Government would be considered an existing legal instrument. Existing access under treaty rights would continue.

## Outreach

**24. *The public should be informed about meeting content in advance of public meetings. The Forest Service should make its public meeting times and locations convenient for the majority of citizens, and where large numbers of people are expected to attend, the Forest Service needs to use meeting facilities large enough to accommodate them. Presentations at public meetings should be clear and tell the whole story.***

**Response:** The Forest Service chose to undertake a far-reaching and comprehensive public involvement process because of the overwhelming public interest in the issue of roadless area management and in consideration of local management needs. To accommodate the large volume of participants with the least disruption to participants' normal daily schedules, many Forest Service offices throughout the country held daylong and concurrent evening sessions to ensure that all who wished to participate would be heard. The large number of local meetings was intended to provide citizens with opportunities to interact with local Forest Service officials and agency representatives so they could jointly explore implications of the proposal on their local area.

Early in the rulemaking process, during the formal scoping phase (October 19 through December 20, 1999), the agency hosted more than 190 public meetings to allow interested persons an opportunity to ask questions and obtain information. Upon release of the DEIS, more than 400 meetings were held to provide information and accept public comments. Based on public requests, additional meetings were held in some States, particularly Texas and Hawaii.

A schedule of all meetings for the DEIS comment period was posted in early May 2000 on the Roadless Project's website – several weeks before the public meetings began. The schedule was also available via a “fax-on-demand” toll-free telephone line that was included in all news releases and documents about the roadless proposal. Knowledgeable personnel also monitored a telephone information line at the Roadless Team's national headquarters during normal business hours (8:00 a.m. to 5:00 p.m. Eastern Time) to answer public queries about the meetings and schedules. Field units publicized meetings in local newspapers.

Roadless Area Conservation presentations, materials, maps, and information were made available on the ([roadless.fs.fed.us](http://roadless.fs.fed.us)) Internet website. The materials, presentations, and website were designed to provide the maximum amount of information about the proposal, environmental analysis, and administrative rulemaking processes and their implications, as well as to disclose the data used in the analysis.

**25. *The Forest Service should address the Internet accessibility of its documents.***

**Response:** The project's Internet website ([roadless.fs.fed.us](http://roadless.fs.fed.us)) has been available to employees and the public since late November 1999. The proposed rule, DEIS, DEIS Summary, and supporting documentation, including maps, have been on the website since early May 2000. Specialist reports and other data, profiles of roadless areas across the nation, meeting schedules, news clips and other media resources, and a wide variety of supporting and background data and information – all of which can be downloaded and printed – were made available from this source and updated regularly to reflect the most recent data and information. In addition, the website, since its inception, was designed for accessibility to the sight impaired and is Bobby (v3.1.1) approved. Bobby is a consortium that reviews and certifies web accessibility.

**26. *The Forest Service should extend the comment period; and***

**27. *Extending the public comment period is just a delay tactic employed by opponents of the proposal; do not extend the comment period.***

**Response:** The Forest Service's extensive public involvement efforts made it unnecessary to extend the public comment period for scoping beyond December 20, 1999, as published in the Notice of Intent. The relative lack of complexity of the proposed rule and the Forest Service's broad and far-reaching public involvement efforts made it unnecessary to extend the public comment period for the DEIS beyond the published date of July 17, 2000. The proposed rule and DEIS, released on May 9, 2000, are based on a strong foundation of public comment and the best available science. Throughout this rulemaking, the Forest Service has conducted extensive public involvement efforts to give as many interested people as possible an opportunity to help define the issues, alternatives, scope, and effects of the proposal. The agency has received an unprecedented volume of comments from the public, academia, organizations, and elected officials.

**28. *The Forest Service should create more opportunities for citizen input and respect the results of that input. The meetings to discuss the DEIS were not enough to make the public aware of the total plan.***

**Response:** The Forest Service has gone to extraordinary lengths to ensure that interested citizens received information about the roadless proposal and had many opportunities to review and to provide timely comment on it. These included:

- Taking advance orders from citizens for the DEIS and Summary documents
- Distributing 50,000 copies of the Summary and 43,000 copies of the full DEIS
- Distributing the DEIS and Summary to 10,500 public libraries for public review
- Making the DEIS available at all Forest Service offices for public review and acquisition
- Making copies of the DEIS and Summary available via the Internet
- Hosting more than 600 public meetings, including more than 200 meetings to collect verbal comments for the record, and also accepting written comments at all meetings
- Accepting comments in many formats, including hardcopy mail, electronic mail, fax, and other media
- Providing a toll-free hotline with meeting schedule information, document ordering information, and voicemail to record and then respond to public questions
- Holding meetings with Tribal officials, elected officials, and a wide variety of interest groups to discuss the proposal.

The Forest Service reviewed all public comments and responded to them. See Response 29.

***29. The Forest Service should respond to requests for information and comments from individuals.***

**Response:** *Scoping Comments:* During the formal comment period for scoping (October 19 through December 20, 1999), the Forest Service received about 365,000 responses from the public, Tribes, and elected officials. (A response is a separate piece of input, such as a letter or e-mail.) By the time the DEIS was released on May 9, 2000, this number had

increased to more than 517,000 responses about the proposal described in the Notice of Intent. There is no statutory duty to respond to comments received during the scoping process, so the agency did not choose to provide individual responses to them. The agency used the insights from the scoping comments to assess the level of controversy about this proposal, to identify issues and concerns that were not identified through internal deliberations, to identify potential alternatives to the proposed action, and to obtain a preliminary assessment of potential environmental, social, and economic effects. The interdisciplinary team evaluated and considered the content of scoping comments during the design and analysis of the DEIS and proposed rule, and included them in the project record for the rulemaking.

*DEIS Comments:* The DEIS comment period elicited 1,155,000 responses from the public, Tribes, and elected officials. Those responses, when added to the 517,000 scoping comments, totaled more than 1,600,000 written responses on the proposed rule and DEIS. This volume of comment is the largest ever received by the Forest Service, and possibly by a Federal agency, on a single proposal. All comments on the DEIS and proposed rule, oral or written or electronic, postmarked by July 17, 2000, were included in the public comment content analysis process, recorded in a database, and summarized for use by the interdisciplinary team and the official responsible for the decision.

The comment period for the DEIS ended July 17, 2000. Published requests for comments originally indicated that comments were to be received by July 17, 2000, at the specified addresses for hardcopy mail, electronic mail, or fax. On July 28, Chief Mike Dombeck rescinded this direction and directed the Deputy Chief for the National Forest System to accept all comments postmarked by July 17, 2000. This change was made to accommodate parties who made a good faith effort to submit timely comments but misunderstood either the addressing directions or the submittal date. In compliance with National Environmental Policy Act procedures, the Forest Service response to public comments on the DEIS is provided to the public in this Volume 3 of the FEIS. Volume 4 of the FEIS shows the comment letters from elected officials, agencies, Tribes, and other government entities.

People seeking general information about the DEIS and proposed rule were directed to information

sources available from the ([roadless.fs.fed.us](http://roadless.fs.fed.us)) website, to information and expertise available at local Forest Service offices, and to published information available at municipal and technical libraries. Questions directed to the National Roadless Team's telephone lines were answered directly by knowledgeable team members.

**30. *The Forest Service should choose appropriate spokespeople for this issue and instruct them to speak with sensitivity and forthrightness. The agency should also address the attitude problem of many of its District Rangers. In the past Rangers were courteous; now many seem overbearing, and others are rude, terse, and arrogant; and***

**31. *The Forest Service should be more considerate in dealing with the public because many people are thinking about lawsuits or worse.***

**Response:** Some commentors referenced quotations from agency spokespersons about Forest Service policy that were published in newspapers, characterizing the quotes as "insensitive." The agency and its spokespeople adhere to Federal civil rights statutes and regulations when addressing the media about public policy.

**32. *The proposed rule should be based on a broad public involvement effort and not just the input of a few select groups. The Forest Service mailing list should include organizations that indicate they want to be actively involved with planning this project.***

**Response:** Environmental, multiple-use, and disability groups and their State, local, and Congressional representatives have all engaged the Forest Service during the Roadless Area Conservation rulemaking process. Their views have been widely quoted and their actions reported in the news media. Throughout the process, the Forest Service has sought the broadest possible public involvement.

Early in the process, the Forest Service contacted a broad range of interests that had not yet been engaged in the roadless issue, and other interests that had previously expressed concerns. Among the interests contacted were academic groups and advocacy groups for motorized recreation, disability access, travel and tourism, and hunting and fishing. Agency line officers also initiated formal

Government-to-Government consultation with Tribal officials. The goal for these contacts was to share information, answer questions, and ensure that all parties had adequate understanding of the proposal so they could effectively comment when the DEIS was released. In addition, the Forest Service has had numerous contacts with Congressional, State, and local officials through briefings, hearings, correspondence, and meetings.

During development of the proposed rule and DEIS, many data sources were reviewed or used for the analysis, including interest group databases, roadless inventory data supplied by Forest Service field units, and information from scientific literature. No interest group's views and comments were given preferential treatment or consideration, nor did any interest group monopolize the rulemaking or environmental analysis processes.

**33. *The process used by interest groups to solicit comments on the proposed rule and DEIS is unfair because most people who sign comment cards handed out by solicitors don't understand the issue, and neither do the people asking for their signatures.***

**Response:** A number of interest groups have solicited signatures from the public at large on petitions and postcards supporting their views. The Forest Service does not endorse or prohibit these efforts because they are expressions of citizens' freedom to participate in the democratic process, as guaranteed by the First Amendment to the Constitution of the United States and regulatory processes such as the Administrative Procedures Act.

Although the democratic process is invoked when a Federal agency solicits comments on an environmental analysis or rulemaking, it should not be construed to be a vote-counting procedure. Every comment has value, whether expressed by a single person or by thousands. The Forest Service's public involvement and outreach focus is to consider the substance of the comments received, rather than the number. Our goal is to ensure that the concerns identified in the comments are addressed in the final rule and FEIS. No interest group's views and comments are given preferential treatment or consideration, and comments are considered without regard to their origin or the commenter's affiliation.

The content analysis process produces a database of the names and addresses of respondents who submitted comments on the Notice of Intent and DEIS. The agency recognizes that many members of the public who regularly participate in planning efforts are accustomed to being placed on a mailing list of participants to receive information and progress reports. However, this proposal is for a national rulemaking and does not always adhere to the same processes that field offices follow during programmatic and site-specific planning. For this rulemaking, the agency did not choose to mail progress reports to respondents. Instead, regular updates were made to the ([roadless.fs.fed.us](http://roadless.fs.fed.us)) Internet website so that up-to-date information was available to the public. Likewise, the agency did not choose to maintain a list of persons and organizations requesting to participate in this process. Instead, the Forest Service made a concerted effort to solicit information from a wide array of sources and provide multiple public comment opportunities.

**34. *The Forest Service rule should allow more time for accurate and fair input from all users of our forests.***

**Response:** The schedule provided adequate time for public comment and completion of the necessary analysis. During the course of the rulemaking process, the Forest Service provided two formal and numerous informal opportunities for interested persons and organizations to provide comment. The first formal comment period, which occurred during scoping, began October 19, 1999 with publication of the Notice of Intent, and ended on December 20, 1999. The second formal comment period, following development of a proposed action, proposed rule, and effects analysis, was initiated by publication of the DEIS and proposed rule on May 9, 2000. This formal public comment period ended July 17, 2000. Both formal comment opportunities included public meetings and open invitations to send written comments using postal mail, electronic mail, and fax; and to provide oral comments at specified public meetings. Informal opportunities to submit comments were available at all times throughout the rulemaking process.

A number of people expressed concerns about the agency's ability to complete the rulemaking and environmental analyses in 14 months. The Forest Service points out that agency officials have devoted

significant resources and time to roadless area issues over the past 20 years. In 1998, almost two years before the Notice of Intent was published, the Forest Service issued an interim rule to temporarily suspend road building in most roadless areas, initiated analysis, and received public comment on both road system and roadless area issues. Many members of the public, Tribes, State and local government officials, and members of Congress have been actively engaged in these issues for some time. The Roadless Area Conservation rulemaking is an attempt to address and resolve these long-standing issues.

**35. *The public involvement and education efforts for the proposed rule have been helpful and should continue. Use photographs that show the country this proposal will conserve.***

**Response:** Forest Service employees nationwide who assisted with more than 600 public meetings (for scoping, information sharing, and public comment) and a wide range of communication efforts for this rulemaking will appreciate knowing their work was useful to public participants. The Forest Service plans to continue its educational efforts throughout the final phases of the rulemaking process and during implementation of the final rule. These efforts include: (a) ongoing conservation education about roadless management topics using radio and other popular media; (b) developing additional profiles of roadless areas from around the country that include photographs and narrative similar to those currently on the ([roadless.fs.fed.us](http://roadless.fs.fed.us)) website; and (c) ongoing dialogue with Forest Service field leadership and citizens once a final rule is adopted and implemented. The Forest Service appreciates the thousands of people who were involved with this issue and urges them to continue working with local Forest Service officials in applying the final rule.

**36. *The proposed rule should provide enough information so that people can understand its relationship to other ongoing strategic planning efforts.***

**Response:** Several respondents indicated concerns about the relationship of the Roadless Area Conservation rulemaking to other policy proposals – particularly the proposed Roads Policy and the proposed Planning Regulations.

The Roadless Area Conservation rule applies to areas that do not already have roads; the proposed Roads Policy addresses existing roads in the National Forest Transportation System; and the new Planning Regulations (36 CFR 219) cover local planning for each administrative unit in the National Forest System. Taken together, these separate initiatives form a cohesive strategy for dealing with vital conservation issues. They seek long-term sustainability of lands and resources, collaboration with the public, and integration of science into decision-making. The new Planning Regulations provide the overarching framework for implementing the roadless area and roads management rules. The Planning Regulations incorporate recommendations from the Committee of Scientists and the Forest Service's two decades of experience in implementing forest and grassland management plans. Much of the Roads Policy and Roadless Area Conservation Rule would be implemented during forest and grassland plan revisions at the local level.

The agency is in the process of revising plans for 36 administrative units (national forests and grasslands) that have published Notices of Intent in the *Federal Register* to revise or establish a land and resource management plan, of which only a few are nearing completion of a draft environmental impact statement. It is unlikely any of these plans would be adopted before promulgation of a final rule for roadless area conservation. As part of the revision of these plans, the agency would evaluate roadless areas and determine how best to conserve them within overall multiple-use objectives. Completion of this rulemaking is not expected to cause delays in ongoing revision processes.

Two large-scale analyses are also underway – the Sierra Nevada Framework for Conservation and Collaboration and the Interior Columbia River Basin Ecosystem Management Project. The Roadless Area Conservation rulemaking is coordinating with these efforts and is not expected to delay these ongoing planning processes (DEIS pp. 3-240 through 3-242). See also Chapter 3 in the FEIS and Responses in the Planning section in this volume that describe the improved analysis of cumulative effects and the relationship of the Roadless Area Conservation rulemaking to other strategic planning efforts underway in the agency.

**37. *The Roadless Area Conservation website is very helpful and well organized; the agency should be commended.***

**Response:** The Roadless Area website was carefully designed to facilitate accessibility and usefulness to the public. We have updated it periodically. Open communication and dialogue with the public is key to this rulemaking.

**38. *The Forest Service is in violation of the Freedom of Information Act because it has repeatedly refused to provide information requested under the auspices of the Act; therefore, the agency should not refuse simple requests for an extension.***

**Response:** The Forest Service's National Headquarters (Chief's Office) has received about 60 requests for information and documentation regarding the Roadless Area Conservation rulemaking under the Freedom of Information Act. The agency has responded to each of these requests.

**39. *The Forest Service should communicate that timber industry folks have a concern and love for the forests, too.***

**Response:** The Forest Service does not claim that those who benefit from commodity or extractive use of National Forest System lands and resources lack respect, love, or concern for those lands and resources. The agency recognizes that roadless lands are important to the American people, no matter what their affiliation, and that the Forest Service, as the Federal agency with jurisdiction over National Forest System roadless lands, has a responsibility for providing a safe, healthy, and productive environment for today's citizens and for future generations (DEIS p. 1-1).

**40. *The Department of Agriculture needs an advocacy panel or group to ensure fairness in the proposed rule.***

**Response:** Creation of an advocacy panel or group to oversee the Roadless Area Conservation rulemaking is beyond the scope of the EIS. The Forest Service's extensive public involvement effort complied with the requirements of the National Environmental Policy Act (42 USC 4321 through 4347) and its regulations (40 CFR 1501.7), and the Administrative Procedures Act (5 USC 553(c)).

**41. *The Forest Service should make local managers available to receive public comment and review before decisions are implemented.***

**Response:** The Forest Service conducted over 600 public information and public comment meetings on the Roadless Area Conservation proposal during scoping and comment on the proposed rule and DEIS. The new Planning Regulations (36 CFR 219) have finalized the procedures that the agency will use through the forest and grassland planning revision process for further protection of roadless areas. This process includes substantial public involvement by local Forest Service officials.

**42. *The USDA should clarify whether its employees are allowed to express opinions about the proposed rule through political activism.***

**Response:** The provisions of several Federal statutes somewhat limit the extent to which Federal employees may partake in political activism. The Hatch Act generally prohibits Federal employees from running for partisan political office, engaging in political activity when on duty, or using their official authority or influence for the purpose of interfering with or affecting activities covered by the Act. The Anti-Lobbying Act prohibits the unauthorized use of appropriated money to influence any member of Congress to favor or oppose any legislation. Two other statutes that prohibit the use of appropriated funds for lobbying activities are Section 637 of the 1999 Treasury and General Government Appropriations Act, and Section 303 of the 1999 Department of the Interior and Related Agencies Appropriations Act. Also, Forest Service policy, (Forest Service Manual 1510.1(c)) cautions Forest Service employees that they may only express personal views on legislation on off-duty time and as a private citizen. Each of these statutes and policies carries substantial penalties for violations.

It is important to note that restrictions in these statutes and policies apply expressly to partisan activities – such as campaigning for a particular political party. A reminder letter is issued annually to all Department employees from the Secretary of Agriculture (Hatch Act notification letter, January 20, 2000). Because it is an election year, additional emphasis and reminders about allowable and restricted political activities have been sent to employees this year.

The Hatch Act’s provisions do not limit a Federal employee’s right to comment as a private citizen on the Roadless Area Conservation Proposed Rule and DEIS. In fact, Forest Service leadership has specifically solicited employee involvement. During the public comment period, Associate Chief Hilda Diaz-Soltero directed line officers throughout the Forest Service to “ensure that interested employees are given the opportunity to participate in a consolidated review process.” Employee responses were considered internal deliberations and were therefore reviewed separately from public comments. In addition, the Associate Chief’s direction emphasized, “individual employees may also choose to submit personal comments, opinions, and recommendations as a private citizen on their own time when off duty, as may any other private citizen.”

Natural resources professionals often have strong and diverse opinions about natural resources issues. Within the Forest Service workforce, issues such as salvage logging and the roads moratorium have evoked strong employee responses in the forms of letters, electronic mail, petitions, and discussion. Chief Mike Dombeck has sought an open debate within the organization on all resource issues. He believes internal dialogue is very healthy and helps identify relevant issues and concerns, and enables the agency to arrive at better decisions.

**43. *The process for this proposal has been rife with misleading and incorrect information, dubious legality and science, and lack of local flexibility. The Forest Service should consider how this process is negatively affecting its credibility and trust with the public.***

**Response:** Public trust is indeed essential to successful decision-making and implementation of any public policy. For this reason, the Forest Service has employed a broad spectrum of public involvement strategies to ensure an open dialogue with interested individuals and organizations. See Responses 15 and 24 in this section.

**44. *The Forest Service should ensure that public meeting comments are recorded.***

**Response:** During the formal scoping period in late November and early December 1999, many members of the public indicated they needed time and information to understand the Roadless Area

Conservation proposal. Some people expressed a desire to obtain more information, while others desired an opportunity to provide oral comment on the proposal. In response to these public requests, and to ensure that the public was given adequate opportunities to obtain materials and information and ask questions about the proposed rule and DEIS, each national forest and grassland and regional headquarters office hosted at least two public meetings between May and July 2000 – for a total of more than 400 meetings nationwide.

The first sessions were informational, providing a description of the proposal, explanatory materials and maps, and local Forest Service officials to explain them. No verbal comments were recorded at these meetings, but written comments were accepted. Subsequent sessions were designed as comment forums in which local Forest Service officials listened to oral comments from the public. These oral comments were also recorded, and later transcribed for the project record, by certified court reporters. The two meeting types were separated to allow participants time to obtain documents and materials at the information meetings and then have adequate time (about 30 days) to review the documents and materials before providing oral comments at the second meeting. Written comments were accepted at both types of meetings.

Some respondents indicated that no one was available to record their comments when they attended a public meeting. It is important to understand that only about 200 of the more than 400 public meetings on the DEIS and Proposed Rule were designed to include recording of public comments. The other meetings were designed to provide information and answer questions, and to receive written comments. It was never the agency's intent to collect verbal comments at the information meetings. That said, the agency acknowledges that in six instances the meetings designed for the collection of oral comments did not follow the design intent. In these six instances, the court reporter contracted by the Forest Service to record public comments was either tardy or did not appear. In five of those cases, the local Forest Service officials recorded the comments using audio recording equipment. In the sixth case, participants were called back by telephone and asked if they wanted the local national forest to hold another meeting or were encouraged to submit written comments.

***45. The Forest Service should provide statistics to validate and clarify the results of the content analysis process.***

**Response:** Content analysis of public comments was undertaken during two critical phases of the rulemaking. During scoping after publication of the Notice of Intent, the Forest Service received more than 517,000 public responses. In response to release of the proposed rule and DEIS, the agency received more than 1.1 million public responses.

The Forest Service's Content Analysis Enterprise Team (CAET) analyzed the more than 1.6 million responses. CAET is a specialized Forest Service unit experienced in both qualitative and quantitative methods of analyzing public comments. CAET uses a systematic process to generate a list of respondents, extract concerns from each piece of correspondence, track similar concerns from different respondents, and identify specific issues. The content analysis process includes methods for tracking specific comments through the entire coding, summarizing, database entry, and response processes to determine how a specific comment or concern was answered by the agency, even where similar comments are summarized, grouped, or consolidated and answered together.

Content analysis of public comments is not a vote-counting procedure, nor is it a measure for determining the number of proponents or opponents of a particular proposal, issue, or concern. Content analysis should not be construed as a scientific or statistical sampling of public opinion because the agency does not control what the public may choose to submit to the content analysis process. In that process, every comment has value, whether expressed by a single person or by thousands. Content of the comment is what matters.

***46. The Forest Service should avoid solicitation of emotionally charged comments.***

**Response:** In allowing the public to provide verbal comment on the roadless area proposal, the Forest Service is fulfilling a legal obligation to provide citizens a forum to speak their mind about the roadless area proposal (40 CFR 1506.6(a), (c), (d), and (e)). When conducting the public meetings where public comments were recorded by a court reporter, Forest Service officials provided "rules of order" as a means of ensuring fair opportunity for

those who desired to speak. Agency personnel were there to listen, not to manage the expression of opinions or emotions of those commenting.

**47. The Forest Service should consider the appropriateness of allowing preservation organizations to sell merchandise at its public meetings, and, in the interest of supporting citizens freedom of expression, should allow people to bring signs to the public meetings.**

**Response:** During several of the public meetings for the roadless proposal, interest groups staged demonstrations, set up tables or booths to promote their views and products, and disseminated information supporting their viewpoints. The Forest Service and management of contracted meeting facilities recognized individuals' and organizations' rights to freedom of expression and did not oppose their signs, booths, demonstrations, and other activities, as long as these activities were confined to spaces outside the rooms designated for the public meetings and met safety standards (such as fire codes) for the facility.

**48. The Forest Service should clarify the difference between the terms “response” and “comment.”**

**Response:** For the purposes of the DEIS and FEIS, “response” means an individual letter or other form of media received during the comment period. Each concern or issue identified within the letter or other media is considered a “comment.” Thus, a single response could include several comments.

For the purposes of this volume, a “response” is the agency’s answer to those comments.

**49. The informational meetings did not comply with the legal requirements of the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA) because public involvement by rural persons was deliberately discouraged. The public involvement process discriminates against rural residents living closest to, and in a dependent economic relationship with, these Federal lands. The public involvement process discriminated against persons without access to computers, persons in certain socio-economic strata, and persons of certain race. The Forest Service should improve public involvement for rural persons without computer access.**

**Response:** The Forest Service recognizes that everyone does not have convenient access to personal computers or the Internet. To serve citizens who lacked personal computers and Internet access, the agency provided opportunities to obtain information and documents and provide comments through a toll-free telephone line and a toll-free fax-on-demand line, in addition to postal mail. To encourage access and review, copies of the DEIS and proposed rule, and other materials were made available at public meetings, all Forest Services offices across the Nation, and at 10,500 municipal libraries throughout the country.

Some commentors expressed concern that people in rural areas were unable to attend public meetings due to excessive distances. Meeting locations were determined in collaboration with Forest Service field offices at locations the local officials deemed most accessible to their public. In response to requests from the public, field offices in some rural areas hosted additional meetings in locations suggested by the public. Other public involvement tools used to facilitate participation by rural communities included news releases published in local newspapers providing information about the rulemaking and soliciting comments, and the diverse media used for providing comment via postal mail, telephone, and fax.

## Separation of Powers

**50. The Forest Service cannot rely on the rationale that, in bypassing Congressional authority over Wilderness designation, its proposal merely serves as “guidance.”**

**Response:** None of the alternatives propose to designate, identify, or recommend additions to the National Wilderness Preservation System; those decisions are outside the scope of the proposed action. The rule would provide regulatory direction that is consistent with the statutes governing management of the National Forest System enacted by Congress. Designation of lands to the National Wilderness Preservation System remains the exclusive prerogative of Congress.

**51. The proposed rule places too much power in the Executive Branch. For this reason, the Forest Service should follow Congressional directives and better involve Congress in its rulemaking, rather**

*than just follow direction from the President and Administration.*

**Response:** The Forest Service is an agency of the Department of Agriculture. The Department of Agriculture is part of the Executive Branch that is charged with the duty, authority, and responsibility to carry out laws enacted by Congress. Administrative rulemaking is within the authority of the Department of Agriculture, the Executive Branch department that administers the Forest Service.

The Legislative Branch, Congress, has passed laws setting aside the National Forest System and requiring the Forest Service to manage these lands within their natural capacity. Congress also appropriates the funds for this work. Congress has exercised its oversight role through many hearings and letters of inquiry throughout this rulemaking. Therefore, the rulemaking process has been subject to direction from both the Executive Branch (the President and Administration) and the Legislative Branch (the Congress).

**52. *The Senate should hold hearings on the Forest Service's handling of public meetings and its failure to provide a sufficient comment period.***

**Response:** The Forest Service has participated in seven hearings with House and Senate committees and subcommittees pertaining to the Roadless Area Conservation process. The public comment period and public meetings were among the topics discussed.

## **Use of Public Comments**

**53. *The Forest Service should respond to the request made by the Board of County Commissioners for Josephine County, Oregon.***

**Response:** Public comments and responses including response to correspondence from elected officials were made part of the official record for this rulemaking. Correspondence from the Board of County Commissioners for Josephine County, Oregon was answered in a response sent to Jim Brock, Chair of the Josephine County Board of County Commissioners, dated June 14, 2000.

**54. *The Forest Service should respond to the majority opinion advocating Wilderness and environmental values over development. To this***

*end, there should be a nationwide vote to determine what the people want in public land management decisions.*

**Response:** The Forest Service does not have legal authority to conduct a national referendum by vote. The Privacy Act prevents the Forest Service from using public opinion polling to validate public comments or to carry out any administrative responsibility.

The Forest Service requests public comment on both environmental analyses and informal rulemakings and considers all comments and responses received. The public comment process for rulemaking is not a vote-counting procedure. Every comment has value, whether expressed by a single person or by thousands. The content of the comments is what matters, so that the agency considers the important issues and alternatives in its analysis (40 CFR 1503.3(a); and Final Questions and Answers, May 2000, as displayed on the web). All comments were considered equally and without regard to their origin or whether they came from local or national interests.

**55. *The Forest Service should give assurance that the public's comments are considered.***

**Response:** This volume of the FEIS represents the Forest Service's disclosure to citizens that their comments were received, considered, and addressed as part of the environmental analysis and decision-making processes, as required by the implementing regulations for NEPA (40 CFR 1503.4). Active public involvement and participation are critical to the democratic process of directing national policy. Public comments are reflected in the scope of the proposed action; the development of alternatives to the proposed action; the analysis of potential social, economic, and environmental impacts; and in changes to the document between the DEIS and the FEIS.

**56. *The Forest Service should address roadless area designation in a fair and compromising format that includes both environmental and multiple-use perspectives. Rural communities should not be ignored through failure to notify them about public meetings. Opinions from individuals should be weighed equally with those of special interest lobbies. No particular interest should unduly influence the Forest Service decision. To ensure fair and open government, a list of lobbyists and***

*legislators who contacted the Forest Service on this issue should be added as an appendix in the final rule.*

**Response:** As directed by the President, the Roadless Area Conservation rulemaking process was designed to facilitate an open and public dialogue. All public interests were encouraged to comment during scoping about the initial proposal and again during the public comment on the proposed rule and DEIS. More than 600 public meetings were held throughout the nation, particularly sited to ensure that local citizens – not just national interests – could provide comment. In an effort to accommodate as many people as possible, comments were accepted in a wide variety of formats, including oral testimony, written comments, fax, video, as well as hardcopy and electronic mail.

The comments were used to identify issues; develop alternatives that enhance important roadless area characteristics and limit or eliminate certain activities in inventoried roadless areas; analyze potential effects from implementation of the proposed action; and develop a public process for identifying the social, economic, and ecological values that make roadless areas important and unique (DEIS pp. 2-1 through 2-38).

Forest Service officials met with elected officials from Federal, State, and local governments and their agencies; American Indian and Native Alaska Tribal officials in fulfillment of Government-to-Government relationship requirements; and a wide array of interest groups, professional organizations, school and university faculty and students, and national forest and grassland users. Among these were off-highway vehicle use advocates, developed and dispersed recreation enthusiasts, disability advocacy groups, transportation and tourism officials, and commodity and environmental advocacy groups. The national Roadless Team maintained ongoing contacts with Forest Service employees in field offices throughout the country to ensure that diverse local interests were addressed in public involvement and outreach efforts.

Specialist reports, data, maps, information, analysis background materials, news releases, and a wide variety of other materials helpful to the understanding of the proposal have been available to interested members of the public through the

Roadless Area Conservation website at ([roadless.fs.fed.us](http://roadless.fs.fed.us)) since early May 2000.

Throughout the rulemaking, interest groups from very different perspectives have worked to mobilize their members to provide comment and be involved in the rulemaking and environmental analysis processes. Their views have been widely quoted and their actions reported in the news media. However, the Forest Service's public involvement and outreach focus is to consider public feedback based on the substance of comments received and to ensure that the concerns identified in these comments are addressed in this volume of the FEIS and in the decision. No interest group's views and comments were given preferential treatment or consideration, nor did any interest group monopolize the rulemaking or environmental analysis processes.

Concerns from individuals and groups are considered equally – the focus is the substance of the issue or concern. Volume 4 of this FEIS contains copies of letters received from agencies, Tribes, and elected officials who submitted comments on the DEIS.

***57. The Forest Service and the Fish and Wildlife Service should be completely overhauled.***

**Response:** Management of other Federal agencies is beyond the scope of the purpose and need for this rulemaking for roadless area conservation on NFS lands.

***58. The Forest Service should note that not all special interest group leaders speak on behalf of everyone in their membership.***

**Response:** All public comments submitted on the Roadless Area Conservation Proposed Rule and DEIS were considered equally, whether from individuals or from groups. The content of comments is what matters.

***59. The DEIS is flawed because it claims to be a response to public concerns but is actually only a response to special interests who want to lock up the land.***

**Response:** The more than 517,000 individual responses submitted during the scoping for the roadless proposal covered many viewpoints and issues, not a singular interest. For example, although many commentators were concerned that the proposal

might limit public access to national forests, others said that access should be limited to protect roadless area values. Many expressed concern that local decision-making and involvement might be undermined by a national proposal, while others said a national rule was needed because local decisions were not solving the problem. The public comment analysis used by the Forest Service focused on the content of what people said, not how many people said it.

***60. Environmental groups pursue conflict and lawsuits to generate revenue. They have no business dominating public land policy.***

**Response:** The activities and motives of interest groups are outside the scope of the EIS.

***61. The Forest Service should address inadequate and rushed scoping for the DEIS. The agency did not even have maps of inventoried roadless areas available.***

**Response:** The Council on Environmental Quality's NEPA regulations do not mandate specific procedures to be followed for scoping. The manner in which public input is sought remains the discretion of the agency (Council on Environmental Quality Guidance Regarding National Environmental Policy Act Regulations, July 22, 1983). The Forest Service used the scoping period listening sessions as a tool for allowing various people to hear from one another, while at the same time informing the agency about their views. Affected national forests and grasslands hosted more than 190 public meetings throughout the Nation during the scoping period. At the same time, line officers were directed to initiate formal consultation with potentially affected Tribes.

Scoping for the Notice of Intent was designed to ensure that a full range of public issues, opportunities, and concerns was identified and considered during development of the proposed rule and DEIS. The scoping process initiated a dialogue with the public that assisted the agency with development of the proposed action, identification of potential alternatives and effects, and identification of significant issues to be addressed during the environmental analysis. Scoping culminated with publication of the proposed rule and DEIS.

A number of people requested an extension of the scoping comment period. The Department and other

agencies with oversight responsibilities for rulemaking decided the public was given sufficient opportunities to comment on the proposal, as published in the Notice of Intent, during the formal scoping period that began on October 19, 1999 and ended on December 20, 1999. During this time, the agency accepted public comments through a variety of formats such as letters, postcards, electronic mail messages, and other media. Although outside the formal scoping comment period published in the Notice of Intent, the agency continued to accept written scoping comments until release of the proposed rule and DEIS on May 9, 2000.

Many interests claimed the agency did not provide the public with adequate information during scoping. A particular concern was that maps of inventoried roadless areas under consideration were not available. Inventoried roadless areas in this analysis were identified using previous forest and grassland planning and assessment processes, including RARE II. This existing information was available for review at local national forest and grassland offices. During the analysis process, this existing inventory was compiled into a national GIS database. The GIS database was used to display maps of the inventoried roadless areas for the DEIS and FEIS.

***62. The Forest Service should consider that its public announcement of the numbers of comments received during a public policy making process might falsely imply strong support for the policy, thereby discouraging further comment.***

**Response:** The Forest Service provided tallies of the number of respondents to solicitations for public comment in response to media and Congressional requests. This information is public record and therefore available for dissemination upon request.

***63. The Forest Service should clarify the relative importance of form letter comments in the content analysis process. Are concerns and signatures on a form letter of less significance than individual letters?***

**Response:** Of the more than 517,000 responses received in response to the solicitation of scoping comments (October 19, 1999 through May 8, 2000), about 60% responses were duplicative of about 300 form letters or postcard campaigns. Of the more than 1,155,000 responses received in response to release of the proposed rule and DEIS (May 9 through July

17, 2000), about 97% were duplicative of about 310 different form letters or postcard campaigns.

The content analysis process places equal value on each comment received from the public. The origin of the comment, the number of times it is repeated, and the format in which it is presented are not relevant. Each unique concern has value because the focus of content analysis is content, not volume.

*End of Involvement Section*