

14. TIMBER

Amount and Location of Harvest	173
Harvest Methods.....	174
Stewardship and Restoration	175
Forest Health	176
Economics	177
Forest Products	178
Road Construction.....	178
Site-Specific Concerns	179
Management Decisions & Direction	179
Public, Private Collaboration	180
Data and Analysis.....	181
Other Concerns	183

Amount and Location of Harvest

1. *Do not allow old-growth forest to be harvested;*
2. *The Forest Service should allow logging in roaded areas but restrict logging of “older growth”;*
3. *The Forest Service should call off all planned or to-be-planned logging operations in roadless and unroaded areas pending revision of forest plans;*
4. *A replanted forest is not the same as a natural forest. The Forest Service should preserve the few remaining natural forests; and*
5. *Management actions such as road construction and timber harvest are not needed to improve forest conditions.*

Response: The DEIS prohibition Alternative 4 (DEIS p. 2-6) was developed to analyze the effects of prohibiting timber harvest in inventoried roadless areas. This alternative prohibits all timber harvest as well as road construction and reconstruction within inventoried roadless areas. In the FEIS, a mitigation has been added to this alternative to allow harvest if needed for threatened or endangered species habitat conservation.

The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Whether timber should be harvested outside of inventoried roadless areas is beyond the scope of the decision as it was described in Chapter 1.

6. The Forest Service should allow logging and other forest management in roadless areas as long as permanent roads are not constructed; and

7. The Forest Service should consider decreasing the percentage of roadless areas where logging is allowed.

Response: The DEIS pp. 2-2 through 2-6 and FEIS Chapter 2 analyze a range of prohibitions on timber harvest and road construction within inventoried roadless areas. Alternative 2 prohibits only road construction and reconstruction while permitting timber harvest that is allowed under the current forest plans. Alternative 3 is similar to Alternative 2 except that it allows timber harvest only for stewardship purposes. Alternative 4 prohibits all timber harvest as well as road construction and reconstruction.

The DEIS pp. 3-112 through 3-116 and FEIS Chapter 3 describe a range of timber harvest alternatives that would occur within inventoried roadless areas. During the period between Fiscal Years 2000 and 2005, Alternatives 1 through 4 would allow harvest levels between 1.1 and 0 billion board feet of timber, respectively, from roadless..

8. The Forest Service should explain how 1.1 billion board feet of timber is slated to be cut in roadless areas between 2000 and 2004 when, in October 1999, President Clinton declared over 40 million acres of roadless forests protected from logging.

Response: President Clinton’s announcement on October 13, 1999, directed the Forest Service “to develop, and propose for public comment, regulations to provide appropriate long-term protection for most or all of these currently inventoried ‘roadless’ areas, and to determine whether such protection is warranted for any smaller ‘roadless’ areas not yet inventoried.” The announcement was not accompanied by any legislation that immediately protected roadless areas. This EIS is the documentation of the analysis, and reflects alternative ways of accomplishing that direction. The approximately 1.1 billion board feet identified is the volume that is planned for offer over the next five years in the no action Alternative 1 (DEIS pp. 3-114 through 3-116). The estimated volume offered for sale over the same period would be 300 million board feet in Alternative 2 and 160

million board feet in Alternative 3. No timber would be offered for sale in Alternative 4.

9. A prohibition on road building will eliminate timber harvest due to high costs, result in greater epidemics and a lack of funding to replant forests, and change the national forests into national brush fields.

Response: The DEIS analyzed a range of alternatives from Alternative 1 (No Action) that would continue with current forest plan direction, to Alternative 4, which prohibits both road construction and timber harvest in all inventoried roadless areas. Two alternatives (Alternatives 2 and 3) would allow timber harvest, but no road construction. The higher costs of timber harvest under each of these alternatives were addressed in the DEIS on pp. 3-182 through 3-189. The ecological effects of these alternatives were discussed in the DEIS by topic on pp. 3-20 through 3-111. This discussion has been expanded in the FEIS.

10. The Forest Service should allow timber harvest in roadless areas; timber harvest should be expressly permitted; appropriate harvest methods include even aged management, clear cutting, selective cutting, and helicopter harvest. Reasons for harvest include forest health, wildfire control, wildlife habitat, and economics.

Response: The purpose of this proposal is to protect characteristics of inventoried roadless areas. The purpose and need (DEIS pp. 1-10 through 1-12) explained that timber harvest and road construction are the activities that, on a national scale, have the greatest likelihood of leading to the loss of roadless characteristics in an area. Since timber harvest has historically generated the need for most road construction in inventoried roadless areas, the alternatives (DEIS pp. 2-3 through 2-6) were designed to prohibit road construction first and allow timber harvest in all but one alternative (Alternative 4). Harvest methods and the specific trees to be removed are site-specific decisions based on local conditions.

11. The Forest Service should consider that there is not enough timber accessible via the existing road system to sustain the forest products industry. Value added industries cannot succeed without a supply of raw material.

Response: The volume of timber anticipated to be offered for sale under each alternative was disclosed in the DEIS pp. 3-112 through 3-116 and 3-182 through 3-186. This estimate was based on volume that would be available with the existing road system. The estimated economic impacts of reduced timber harvest are disclosed in the DEIS pp. 3-186 through 3-189. Effects on community stability associated with changes in timber production from national forests were disclosed in the DEIS pp. 3-208 through 3-215, and in the FEIS Chapter 3 in the sections on Human Uses: Timber Harvest; and Social and Economic Factors: Timber Harvest, and Forest Dependent Communities.

12. The Forest Service should consider that timber supply under the roadless area rule would be substantially less than the DEIS predicts.

Response: The DEIS recognized that volume sold is historically less than the volume planned in the early stages of each project. The DEIS pp. 3-184 through 3-189 described the process that was used to adjust forest-level data on planned offer from inventoried roadless areas for the next five years to an estimated annual likely harvest, and the effects of that harvest level under each alternative.

Harvest Methods

13. The Forest Service's alternatives prohibiting roads, but allowing commercial timbering are uneconomical, less efficient, and devious.

14. The Forest Service should not allow helicopter or cable logging because of negative impacts on flora, fauna, and fire in roadless areas.

15. A prohibition only on road building will result in deforestation of ancient forests through helicopter logging.

Response: Alternatives 2, 3, and 4 (DEIS pp. 2-2 through 2-6, Chapter 2 of the FEIS) would prohibit road construction and reconstruction in all inventoried roadless areas. Alternative 4 (DEIS p. 2-6, Chapter 2 of the FEIS) would prohibit all timber harvest, road construction, and reconstruction in inventoried roadless areas, including helicopter and cable logging. The effects of implementing the alternatives were described in various resource sections within Chapter 3 of the DEIS.

16. Even-aged management of any kind should be prohibited in roadless areas.

Response: Many forest types regenerate best and are healthiest under even-aged management. Even-aged management methods, including shelterwood, seed-tree, and clearcut harvests would be used in Alternatives 1, 2, and 3. Clearcutting as a harvest method has decreased from 31% of total harvested acres in 1989 through 10% in 1997 as result of a 1989 Chief's decision. This downward trend is expected to continue, except in Alaska (DEIS p. 3-114). In Alternative 3, timber harvest objectives for stewardship purposes would employ thinnings from below as well as other methods to improve forest health, create desired habitat conditions, and reduce fuels. In some unusual situations clearcutting may be necessary to prevent specific diseases like black stain from reaching epidemic proportions, or to benefit wildlife as when small openings are created to provide browse for elk (FEIS Chapter 3).

17. Old-growth forests should not be used for pulp production.

Response: Timber products from the National Forests are sold by competitive process to the highest bidder. The products into which the purchasers convert the timber are not normally specified by the sale contracts, but most purchasers will process it to receive the highest economic value to them. This analysis does not authorize any timber harvest within inventoried roadless areas, but instead evaluates whether timber harvest in those areas should be allowed, and for what purpose.

18. The Forest Service should correct claims of decreased clearcutting in the Draft EIS. Seed tree, shelterwood, and salvage logging are also clearcuts. The Forest Service incorrectly uses terms such as 'group selection' to include small clearcuts of up to five acres in size.

Response: The amount of clearcutting has decreased substantially since 1989 as described in the DEIS p. 3-11 and in the FEIS Chapter 3. Clearcutting is defined as an even-aged cutting method in which the entire standing crop of trees from an area is removed at one time (FSM 2470.5 [2]). This differs from seed tree cutting or shelterwood cutting where some mature trees are retained, either to provide seed for natural regeneration, or to provide shade for tree seedlings. Group selection harvests are small

openings usually less than two tree heights in diameter, and are generally less than two acres in size. Definitions for clearcutting, seedtree cutting, shelterwood, and selection cutting methods are included in the Glossary of the FEIS.

19. The Forest Service should define the following terms: even-aged management, uneven-aged management, selection cutting, clearcut, shelterwood, and seedtree.

Response: These terms are included in the FEIS Glossary.

Stewardship and Restoration

20. The Forest Service should define stewardship.

Response: Stewardship-purpose timber harvest was explained on p. 3-112 of the DEIS, and was defined in the DEIS Glossary on p. G-7. It is generally defined as sales conducted primarily to help achieve desired ecological conditions and/or to attain some non-timber resource objective that requires manipulating the existing vegetation. Stewardship has been clarified in the EIS.

21. The Forest Service should address restoration of lands affected by the extractive industries.

Response: Timber harvest, mining, and other ground disturbing actions are subject to analysis and approval under the National Environmental Policy Act (NEPA), and must comply with other environmental laws including the National Forest Management Act (NFMA). Best Management Practices (BMPs), regulations, Plans of Operations, contracts, and inspections are used to implement those decisions and regulate commercial practices. These regulations and procedures provide for restoration following ground disturbing activities.

The DEIS recognized that some public input received on this project would like an emphasis placed on restoration activities (p. 3-191). The DEIS (p. 3-200) also stated that current proposed budget requests emphasize watershed protection and restoration as part of the Natural Resource Agenda. Alternatives 1 through 4 would all reflect the Natural Resource Agenda priorities, but the restriction on road construction in Alternatives 2 through 4 could result in a reduced likelihood of restoration treatments occurring and increased costs of treatment

when undertaken (p. 3-200). Alternative 4 would further reduce restoration activities by prohibiting the management tool of timber harvest.

22. *The proposed rule should exclude all timber harvest activities, whether for “commercial thinning”, “salvage”, “forest health prescription”, or any other reason. “Forest health” or “stewardship” should not be used as an excuse for harvesting.*

Response: Timber harvest and other forestry practices are important tools to achieve ecological objectives such as reducing the spread of insects and disease, reducing forest fuel accumulations, reducing wildfire risk, and improving wildlife habitat.

Alternatives 1, 2, and 3 would allow for timber harvest and other mechanical treatment to continue to be used within inventoried roadless areas, as discussed in the DEIS (pp. 2-4 and 2-5). Alternative 4 would not allow any timber harvest or road construction activities. More information about the effects of forestry practices from implementing the proposed action or the alternatives were in the Forest Health (pp. 3-97 through 3-109) and Timber Harvest (pp. 3-112 through 3-116) sections of DEIS Chapter 3.

As described in the FEIS Chapter 2, description of alternatives, stewardship harvest would be done only where it maintains or improves roadless characteristics, and also improves threatened, endangered, proposed, or sensitive species habitat, reduces risk of unnaturally intense fire, or restores ecological structure, function, processes, and composition.

23. *The Forest Service should only allow stewardship logging within roadless areas.*

Response: The DEIS pp. 2-1 through 2-4 and Chapter 2 of the FEIS describe Alternative 3, in which only stewardship-purpose harvest is allowed.

24. *The Forest Service should disclose the mix of stewardship and commodity timber harvesting.*

Response: The DEIS pp. 2-1 through 2-4 and Chapter 2 of the FEIS describe historical and expected mixes of stewardship and commodity timber harvesting. Only stewardship harvest sales

would be allowed within roadless areas in Alternative 3.

Forest Health

25. *Forest health requires an increase in forestry activity. The Forest Service should analyze the risks of insects and diseases within roadless areas and should salvage areas with trees killed by insects or diseases.*

Response: Timber harvest and other forestry practices are important tools that allow national forest managers to achieve ecological objectives such as reducing the spread of insects and disease, reducing forest fuel accumulations, and improving wildlife habitat. Alternatives 1, 2, and 3 would allow for timber harvest and other mechanical treatment to continue to be used within inventoried roadless areas, as discussed on pp. 2-4 and 2-5 of the DEIS. Information about the effects of forestry practices from implementing the proposed action or the alternatives was described in the Forest Health (pp. 3-97 through 3-109) and Timber Harvest (pp. 3-112 through 3-116) sections of DEIS Chapter 3.

26. *The Forest Service should not use insect control as an excuse to allow logging.*

Response: Timber harvest is a tool that can be used to reduce the spread of some insects and diseases, and to recover usable wood after the trees have been killed by these agents. Approximately 7 million acres within national forest inventoried roadless areas are currently at high risk of tree mortality where more than 25% of the trees are expected to die from insect or disease impact over the next 15 years (DEIS pp. 3-107 through 3-109). This is similar to the levels of insect and disease mortality on NFS lands outside of inventoried roadless areas. Alternatives 1 and 2 allow timber harvest as guided by current forest plans. Alternative 3 (DEIS p. 2-5) focuses on stewardship activities designed to promote forest health. Some of the health factors that stewardship harvests attempt to treat are fire susceptibility, forested species mix, and insects or disease.

27. *The Forest Service should make forest health its top priority and leave politicians out of the process.*

Response: The Natural Resource Agenda for the Forest Service, announced in 1998, focuses on four key areas: 1) watershed health and restoration, 2)

sustainable forest ecosystem management (forest health), 3) forest roads, and 4) recreation. The purpose of this roadless area conservation analysis is to address road construction and timber harvest within inventoried roadless areas.

The purpose and need for the Forest Service Roadless Area Conservation EIS was disclosed in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Forest health as a policy or priority for the National Forest System is beyond the scope of this roadless area analysis.

28. *Performing proven forestry activities to control insect and disease infestation requires a network of roads. Forest health conditions are severe and should be addressed before the value of the wood is compromised by injury, insects, or stained by fungus. Timber should be harvested rather than letting it burn or be destroyed by insects and disease.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Forest health issues associated with insects and diseases were discussed in the DEIS, pp. 3-12, 3-97 through 3-98, 3-107 through 3-111, and in Chapter 3 of the FEIS. Alternatives 1 through 3 allow the harvest of dead and dying timber in inventoried roadless areas where currently permitted by forest plans. The effects of the prohibitions on road construction and timber harvest in Alternatives 2 through 4 are described in the DEIS and FEIS. It is acknowledged in the DEIS on pp. 3-108 through 3-109 that fewer acres of forest can be treated under Alternatives 2 through 4 to accomplish forest health objectives than would be the case in Alternative 1. Page 3-107 of the DEIS acknowledged the severity of insect and disease risks in forestlands across the country.

Economics

29. *The Forest Service should address the effect this Proposed Rule will have on non-Federal lands.*

Response: The DEIS (p. 3-114) noted that the reduction in national forest timber harvest volumes from 1987 through 1999 was offset by an increase in harvest on private lands and timber imports primarily from Canada. The total affected volume from any of the alternatives is less than 0.5% of total U.S. production. There may be some substitution of

timber volume from imports and private land ownerships, but the effect will be small (DEIS p. 3-189).

The DEIS (p. 3-109) also discussed that higher costs to harvest timber without road construction may lead to fewer acres being treated, and it stated that insect or disease problems may move from national forest to private land.

30. *Reducing timber harvest in the U.S. will shift demand to other countries which have fewer environmental protections.*

Response: Most of the timber and other forest products imported into the United States today come from Canada and are subject to Canadian environmental protection laws. The timber harvest volume affected by Alternatives 2 through 4 is less than 0.5% of total U.S. production (DEIS p. 3-189 and Chapter 3 of the FEIS). There is likely to be some substitution of timber from private or foreign lands (DEIS p. 3-243, FEIS Chapter 3) from implementing the proposed rule, but the overall effect on imports will be small.

31. *The proposed action would not furnish a continuous supply of timber for the use of U.S. citizens. Logging levels would not change because timber harvest targets would force harvest into other areas of the national forests.*

Response: The Forest Service is likely to continue offering an annual timber sale program in the range of 3.0 through 4.0 billion board feet in the coming years. The timber volume reductions harvested under Alternatives 1, 2, and 3 between fiscal years 2000 and 2005 were projected in the DEIS pp. 3-113 through 3-114, and in the FEIS Chapter 3. In recent years, an average of 3.3 billion board feet of timber were offered for sale. Alternative 4 would result in a reduction of about 7% in the amount of volume offered for sale. This proposal would not affect timber consumption within the United States and represents less than 0.5% of total demand. It may result in some substitution of timber from other ownerships or from imports (DEIS p. 3-189). Volume harvested from other parts of the national forests will not be increased to compensate for reductions associated with implementing Alternatives 2, 3, or 4.

32. *Technological advancements can account for loss of jobs in the timber industry.*

Response: Technological change has resulted in the loss of jobs within the timber industry. Timber harvest from Federal lands has also declined. Job loss can result from either source, or a combination of them. Alternatives 2 through 4 would each result in a different reduction of timber harvest from within inventoried roadless areas.

33. *Prohibiting timber harvest in roadless areas would have a negligible impact on the Federal budget, a very small effect on Forest Service harvest levels, and a miniscule impact on total U.S. timber production.*

Response: The effects of each alternative on timber harvest volumes and Federal revenues were disclosed in the DEIS pp. 3-184 through 3-188, and updated in Chapter 3 of the FEIS.

Forest Products

34. *The Forest Service should clarify whether Alternative 4 would allow timber harvest of “dead and down” trees and the limitations on firewood cutting.*

Response: The DEIS (p. 2-6) stated that personal use harvest for firewood is allowed under all alternatives, if permitted locally. Limitations on personal-use firewood, including whether dead and down wood can be cut, are established locally at the national forest or district level.

35. *The Forest Service should address the effects of the proposed rule on the demand for miscellaneous forest products and the dependence of rural communities on these products.*

Response: The DEIS (pp. 3-179 through 3-181) discussed Non-Timber Forest Products and the effects of Alternatives 1 through 4. Some forest product availability (such as some firewood or posts and poles) is also linked to timber harvest activities which were discussed in the DEIS on pp. 3-112 through 3-116. The economic effect of the prohibitions on road construction and reconstruction and timber harvest on forest-dependent communities over the next five years was described in the DEIS on pp. 3-209 through 3-222. These sections have been updated in Chapter 3 of the FEIS.

Road Construction

36. *Timber production should be permitted on a managed basis to clear away excessive growth to reduce wildfire risk in roadless areas. If roads need to be constructed to permit periodic harvest of timber, then allow it, provided roadbeds are removed after harvest.*

Response: Timber harvest and mechanical treatment of fuels within roadless areas would be permitted in Alternatives 1 (No Action), 2, and 3 as described in the DEIS, pp. 2-4 through 2-5, and in Chapter 2 of the FEIS. Some types of mechanical fuel treatments would be allowed in Alternative 4. However due to limited access, only relatively insignificant numbers of acres immediately adjacent to existing roads would be economical to treat (DEIS pp. 3-98 through 3-107 and FEIS Chapter 3). Removal of roadbeds through obliteration would not restore the land or vegetation to its pre-existing condition. The effects of roads on mass wasting, hydrology, wildlife, plants, and soils were described in Chapter 3 of the DEIS.

37. *Costs of helicopter logging in a roadless area would be cheaper than costs of road construction and costs of maintaining roads for improved firefighting access.*

Response: Helicopter logging is permitted within Alternatives 1, 2, and 3; no timber harvest is permitted under Alternative 4. DEIS pp. 3-112 through 3-116 provided more information about timber harvest allowed under each alternative. As stated in these pages, the economics of timber harvest with a helicopter depend on many factors, such as timber value, terrain, and distance to an existing road. Helicopter yarding in the Pacific Northwest costs three to five times more than ground based yarding systems. Helicopter yarding is generally not feasible at distances more than a half mile from the nearest road. A site-specific analysis would be required to determine the best economic solution for any given proposal and area.

38. *The final rule should specify that salvage logging either before or after natural disturbances, is prohibited in roadless areas to prevent abuse of the “catastrophic events” exception.*

Response: The DEIS prohibition Alternative 4 (DEIS p. 2-6) was developed to analyze the effects of prohibiting timber harvest in inventoried roadless areas. This alternative prohibits all timber harvest as well as road construction and reconstruction within inventoried roadless areas.

Road construction or reconstruction in inventoried roadless areas could be allowed to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property. Salvage harvest would not qualify as an imminent threat allowing exception from the prohibition on road construction under this or under any of the other exceptions to the prohibitions shown in the DEIS on p. 2-4.

Site-Specific Concerns

39. *The Forest Service should keep its promise to Minnesota residents regarding timber cutting outside the BWCA.*

Response: The Boundary Waters Canoe Area (BWCA) Wilderness Act of 1978 directed the Forest Service to: “expedite the intensification of resource management... in Minnesota outside the Wilderness to offset, to the extent feasible, the reduction in the programmed allowable timber harvest resulting from the reclassification of the Boundary Waters area” (Section 6(c)(1)).

The Chippewa National Forest has no inventoried roadless areas affected by this proposal. The Superior National Forest has approximately 62,000 acres of inventoried roadless areas. Approximately 18,500 of those acres (less than 1% of the forest land base) are available for timber harvest under the current forest plan. Alternatives 1, 2, and 3 would not prohibit timber harvest, although it’s likely that cost increases to remove timber from more remote areas without roads would result in less volume being harvested in Alternatives 2 and 3. Alternative 1 (no action) would not result in any reduction in harvest volume offered from inventoried roadless areas.

40. *The Forest Service should address the impacts on timber harvest volumes on the Caribou National Forest.*

Response: Timber harvest changes were estimated for each forest that planned timber harvest activities in an inventoried roadless area during the next five years (*Socioeconomic Specialist Report, May 2000*, Section F – Timber, Table F-11 pp. F-18 through F-20). Caribou National Forest personnel estimated that approximately 19 million board feet would be offered for sale from inventoried roadless areas during fiscal years 2000-2004. This analysis calculated that the prohibition of road construction under Alternative 2 would result in an expected annual harvest that is 45% of the no action Alternative 1 on the Caribou NF. In Alternative 3 the expected harvest would be 5% of the no action alternative. Nationally, the expected harvest of Alternative 2 would be 49% of Alternative 1 (excluding the Tongass NF), and Alternative 3 would be 14% of the Alternative 1 level.

41. *The Forest Service should stop all 90 new Roadless Area logging projects being planned in Idaho.*

Response: One of the alternatives analyzed would prohibit all timber harvest in these areas, as well as road construction and reconstruction. The DEIS described this Alternative 4 in Chapter 2, p. 2-6. Alternative 2 (the proposed action) as well as Alternatives 1 and 3 would allow for timber harvest and other mechanical treatment to continue within inventoried roadless areas, as discussed on pp. 2-4 and 2-5 in the DEIS. Decisions approved prior to the effective date of the final rule would not be affected by the prohibitions, as provided by Section 294.14 of the proposed rule in DEIS p. A-28 and explained on p. A-16.

42. *The Forest Service should ban logging on the Prescott National Forest.*

Response: The purpose and need for this action (DEIS pp. 1-10 through 1-12) is to protect characteristics of inventoried roadless areas. The specific management direction for a national forest is decided as part of the forest planning process (36 CFR 219) and is beyond the scope of this analysis.

Management Decisions & Direction

43. *No matrix forest should be set aside as unroaded under this proposed rule;*

44. The Forest Service should allow no net loss of Northwest Forest Plan matrix designated lands; and

45. The Forest Service should limit timber harvest to those areas under Matrix or other 'flexible' forest uses such as some Adaptive Management Areas if these areas are not roadless areas under consideration in this proposed rule.

Response: “Matrix forest” is specific to forests within the range of the Northern Spotted Owl and managed under the Northwest Forest Plan. It consists of the Federal lands within the range of the northern spotted owl that are not among six categories of lands designated for special management. Matrix forest occurs in a portion of a number of inventoried roadless areas.

This analysis and rulemaking does not designate any additional roadless areas. The inventoried roadless areas to which the prohibitions would apply are the result of previous inventories and assessments, and are displayed in Volume 2 of the DEIS and FEIS.

Changing land allocations made in the Northwest Forest Plan is beyond the scope of this rulemaking.

46. Past timber mismanagement should not be used as an excuse for allowing logging in roadless areas.

47. The Forest Service should not adopt the proposed rule inasmuch as it is just an excuse for the fact that national forests have failed to meet their own set targets for timber production within existing forest plans.

Response: The purpose and need for the proposed rule identified the benefits of conserving roadless areas as well as the fact that controversy over roadless area management continues to generate costly and time-consuming appeals and litigation (DEIS pp. 1-1 through 1-5, 1-10 through 1-12). The DEIS (pp. 3-112 through 3-114) also described some of the reasons that the volume of timber offered from NFS lands has declined from more than 11 billion board feet (BBF) in 1987 to 2.2 BBF in 1999.

Allowable sale quantity (ASQ) is an upper limit for the plan period. Effects on ASQ include budget, demand, and environmental concerns. As forest plans are revised, ASQ calculations are being

reduced to reflect a change in emphasis for NFS lands.

48. The Forest Service should analyze and disclose the direct, indirect, and cumulative effects of the suitability of acres of timber production or multiple use in each roadless area, as well as the potential of each roadless area to produce timber and meet existing Allowable Sale Quantities for affected national forests. The Chief's moratorium on timber sales within roadless areas is likely to have had an effect on projected sale volumes during the five year period assessed in the DEIS.

Response: Forest plan revisions completed since 1993 have shown a national trend toward lower timber volume Allowable Sale Quantities (DEIS pp. 3-113 through 3-114, FEIS Chapter 3). This is similar to the overall trend in volume harvested from National Forests, as shown in the DEIS p. 3-187. This trend toward lower ASQ estimates is attributed to the change in management emphases in the roaded and unroaded portions of the national forests. Timber volumes projected to be harvested for each alternative from inventoried roadless areas over the next five years were displayed in the DEIS p. 3-185. A discussion of the acres of land suitable for timber production, and the potential for timber production within roadless areas is included in the FEIS. A discussion of possible effects of the Chief's moratorium on timber sales within inventoried roadless areas on planned volumes for the next five years is also in the FEIS.

49. The Forest Service should use the terms “scheduled” and “unscheduled” harvest when discussing the alternatives.

Response: Scheduled and unscheduled timber harvest is discussed in the Timber Harvest section of Chapter 3 of the FEIS.

Public, Private Collaboration

50. The Forest Service should develop a joint industry-government scheme to allow some road building and harvesting of fallen trees.

Response: Under current direction (described as Alternative 1) road construction is allowed for timber harvest and to salvage dead and wind thrown trees that have merchantable value in some roadless areas (DEIS pp. 3-2, 3-49 through 3-52). Alternatives 2

and 3 would allow timber harvest, but would prohibit road construction. Most road construction and timber harvest on the national forests is performed by private industry under contract.

51. *The proposed rule should call for responsible forest management that allows for compatible working arrangements between the Forest Service, sportsmen, industry, and the general public.*

Response: The Multiple-Use Sustained Yield Act and the National Forest Management Act (NFMA) require that the national forests be managed for a variety of sustainable uses. Forest and grassland plans as developed under NFMA with public participation, establish a mix of uses for each area of the forest or grassland. Each forest or grassland plan also incorporates legislated land allocations (such as Wilderness) and administrative regulations (such as the proposed rule) into the allowed uses. The new Planning Regulations (36 CFR 219) place additional emphasis on collaboration with the public (DEIS pp. 1-14 through 1-15).

While Alternative 2 would prohibit road construction and reconstruction within inventoried roadless areas, Alternative 1 would make no changes to current management direction, and Alternatives 3 and 4 would restrict or prohibit timber harvest within those areas. The management direction for the remainder of each forest would not change until the forest plan is revised or amended. This analysis addresses only inventoried roadless areas. The purpose and need for the Forest Service Roadless Area Conservation EIS is disclosed in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Whether the Forest Service should develop a process for better collaboration with the public is beyond the scope of the decision.

Data and Analysis

52. *Data used in the DEIS for timber harvest projections overstates activities planned during the next five years because old and unreliable harvest schedule data were used. The Forest Service should provide the public with an analysis of the reliability of harvest schedule volume estimates. The Forest Service incorrectly used timber volumes harvested in recent years, rather than forest plan projected harvests when it analyzed the effects of implementing the Alternatives displayed in the DEIS. The Forest Service incorrectly used data*

from existing forest plans to project road construction while using national forest harvest schedule data to project timber harvest for the period FY 2000-2004.

Response: Data used to estimate harvests and roads during the period between FY 2000 and FY 2004 were provided by national forests based upon the most up-to-date and reliable information available as of May 2000. Harvest schedules are prepared and maintained by national forests as a normal part of business operations. Schedules are constantly updated as new information becomes available. The validity of schedules is assured through normal management controls over Forest Service operations.

Litigation, appeals, and continuing controversy over management of public lands in the United States has resulted in several amendments to existing forest plans. Recent decisions such as the President's Northwest Forest Plan (1994) that affected national forests in Regions 5 and 6 have amended forest plans and resulted in substantially reduced ability to meet Allowable Sale Quantity (ASQ) projections. The Probable Sale Quantity, an estimate of the ability to meet the ASQ within the President's Northwest Plan, is about 25% of the volume harvested in the decade prior to implementation (FEMAT p. VI-5). Nine of eleven individual forest plans revised since 1993 nationwide project substantial to very substantial declines in ASQ (DEIS p. 3-113, Table 3-21, FEIS Chapter 3). Many forest plans nationwide are in need of revision to reflect current conditions. Based on this, current harvest schedules are a more appropriate basis to project harvest volumes than ASQ estimates in existing forest plans.

53. *There is not enough specific information about the content of the forests within the proposed roadless area to make an informed decision.*

Response: The purpose and need of this proposal is to protect characteristics of inventoried roadless areas, and to ensure that inventoried roadless areas receive consideration in local forest and grassland planning. In order to analyze the effects of this proposal, the agency has used available information at the appropriate national scale.

Economic and timber harvest effects were determined using information provided by each forest about their projected timber harvest program from inventoried roadless areas over the next five

years. Forests also estimated the effects on that program from a restriction on road construction and reconstruction. The DEIS (pp. 3-184 through 3-185, Table 3-40) used historical data to calculate the likely actual harvest volume from these planning estimates.

54. The Forest Service should correct discrepancies between Table 2-2 and page 3-76 of the Draft EIS.

Response: The FEIS was revised to correct and clarify timber harvest effects in relation to terrestrial and aquatic habitats.

54A. The Forest Service should inventory all lands in question into a computer-based modeling system in which all areas are assigned values of use and condition. If the annual agreed upon harvest is beyond that available in currently roaded inventory, a suitable portion of the 43 million roadless acres deemed harvestable would act and be managed as a bank account of surplus harvest, preferably harvested without roads.

Response: Local land managers have access to a variety of computer-based databases and analysis systems, which allow for review of land use and land cover and allow for local planning and management activities. Such data are variable in format, methodology, and precision, and therefore, such site-specific information is not suitable for use in a national rulemaking effort such as this.

Work has been done throughout the entire Forest Service to convert information on its existing land base into a computer-based system. These efforts have resulted in the development of a variety of geospatial data products for agency applications. In addition, the Forest Service is creating a national resource information system that will have analysis and modeling capabilities.

The agency considered but did not analyze in detail an alternative to make all inventoried roadless areas fully available for development.

The rule would not provide for identifying and managing portions of inventoried roadless areas as a “bank account” for surplus harvest, as suggested. Developing such an alternative to incorporate this concept would be outside the rule’s purpose and need, which is to immediately stop activities that

have the greatest likelihood of degrading desirable characteristics of inventoried roadless areas.

55. The No Action Alternative’s baseline for timber production is for too short a time period, so the analysis is flawed. It is not clear what might be expected after 2004.

Response: The volume of timber expected to be offered for sale over the next five years was displayed in the DEIS at pp. 2-23, 3-10, 3-114 through 3-116, and 3-184 through 3-188. Page 3-188 of the DEIS stated that while the quantified effects of timber offered were for only five years, the harvest may actually occur over a greater period of time, “up to four years after sales are made.” Discussion of the long-term effects is in Chapter 3, Timber Harvest section, of the FEIS.

56. The Forest Service should take into account in the roadless analysis that the acreage of forested lands nationwide has increased substantially since 1920 when addressing the contribution of roadless areas to national timber harvest levels.

Response: The DEIS disclosed the projected contribution of roadless areas to Forest Service harvest levels, and to the volume of timber harvested on a national basis (pp. 3-182 through 3-188). This discussion is expanded in the FEIS.

57. The Forest Service should combine the discussions of timber harvest on pp. 3-112 (Human Uses, Timber Harvest) and 3-182 (Social and Economic Factors, Timber Harvest).

Response: The DEIS (pp. 1-16 through 1-17) and the FEIS (Chapter 1) describe the organization of the document. Chapter 3 of each EIS has been written to each appropriate resource under the headings of Ecological Factors, Human Uses, and Social and Economic Factors. Most resource areas are addressed under each of these three main headings.

58. The Forest Service should use consistent units that clearly communicate effects when addressing fragmentation or other biotic and abiotic impacts (i.e. timber volume harvested vs. numbers of harvested acres).

Response: Consistent units of measure are used in Chapter 3 of the FEIS to display and communicate effects.

59. *The DEIS should report the cumulative effect of the Roadless Initiative, in combination with other environmental legislation, in regards to limiting timber harvest in the national forests.*

Response: The DEIS (pp. 3-239 through 3-242) included sections on the combined effects of the prohibition and Tongass alternatives as well as a section on the cumulative effects of the proposed roadless rule with other Forest Service proposed rules. The other rules considered in the cumulative effects analysis were the proposed National Forest System Land and Resource Management Planning Rule (Planning Regulations), and the proposed National Forest System Road Management and Transportation System Rule (Roads Policy). Two large-scale regional analyses were also discussed: the Sierra Nevada Framework, and the Interior Columbia River Basin Ecosystem Management Project (ICBEMP).

The agency updated the cumulative effects analysis in the FEIS to describe the effects of these and other major regulations, policies, and planning decisions when considered together.

Other Concerns

General

60. *The proposed rule should be better studied and then presented by someone who knows forestry and logging.*

Response: The purpose and need for this action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. The list of preparers and contributors for the DEIS was provided in Chapter 4, pp. 4-4 through 4-8, and in Chapter 4 of the FEIS.

61. *This plan is the result of a ruthless attack by the environmental industry on the validity of forest management. The past is an incredible testimony to the power of forestry, including road building, to serve the nation's economic interests while conserving forest resources.*

Response: The purpose and need for the proposed rule was described on pp. 1-10 through 1-12 of the DEIS, and in Chapter 1 of the FEIS. As stated in the DEIS, there is a history of controversy surrounding the management of roadless areas. The Forest

Service has developed a proposed action, and action alternatives, that meet the need to protect values prevalent in roadless areas.

62. *It is not clear from the DEIS that Alternatives 2 and 3 would allow logging to occur in the absence of roads.*

Response: Chapter 2 of the FEIS clarifies the circumstances and locations where timber harvest may occur within roadless areas in the description of alternatives.

Forest Growth

63. *The Forest Service should not put out false reports that forests have re-grown when they are hardly replanted. Acres of forested land should be increased.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. The information provided to the public on reforestation is the most current available. The question whether the total acres of forest land has increased or decreased is beyond the scope of the analysis as described in Chapter 1 of the DEIS and FEIS.

64. *The concept of sustainable logging is a myth.*

Response: One of the four key areas of the Forest Service's Natural Resource Agenda is sustainable forest ecosystem management. The basic point of this strategy is that healthy, diverse, and productive watersheds and ecosystems require active management based on sound science. That management will result in the production of water, wildlife habitat, timber, and recreation opportunities. The purpose of the proposal is not to evaluate sustainability, but to prohibit road construction and reconstruction in inventoried roadless areas. The proposal would set prohibitions on road construction and timber harvest in inventoried roadless areas.

65. *Timber harvest needs can be met by tree plantations rather than harvesting in roadless areas.*

Response: Timber harvest in inventoried roadless areas may also improve stand conditions and meet other resource objectives beyond production purposes. The purpose and need for the action was

described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Federal timber harvests are based on the amount that can be sustained over the long term. Reforestation is required by the National Forest Management Act of 1976 where openings are created as a result of timber harvest. Estimates of the Allowable Sale Quantity from national forest lands have declined in most recent forest plan revisions as described in the DEIS, pp. 3-112 through 3-114, and in Chapter 3 of the FEIS. Part of the decline is attributed to the change in management emphasis for roaded and unroaded portions of the national forests.

Management

66. *The Forest Service should look to Switzerland for guidelines for managing forest lands. Certain areas should be set aside specifically for timber production by the Forest Service, where they would be managed as tree farms. Within these areas the Forest Service should evaluate logging methods, and employ only sustainable harvesting practices. Alternatives to timber harvest should be used for management.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. The analysis considered but did not analyze in detail alternatives that would make all inventoried roadless areas fully available for development (DEIS Chapter 2). The alternatives would provide for different levels and methods of timber harvest, as determined site-specifically at the local forest level. Timber management practices used throughout the national forest lands, practices employed in other countries, and whether lands should be specifically set aside for timber production are beyond the scope of the decision as described in Chapter 1 of the DEIS and FEIS.

67. *Skid trails should not be allowed in roadless areas and in the national forests.*

Response: Skidding within inventoried roadless areas is permitted as part of Alternatives 1, 2 and 3. Due to extensive public comment during the scoping phase, Alternative 4 was developed to reflect the public issue raised that there should be no timber harvest permitted within inventoried roadless areas. The purpose and need of this analysis (DEIS pp. 1-10 through 1-12) is to address the conservation of inventoried roadless areas. Whether to allow skidding on National Forest System (NFS) lands

outside inventoried roadless areas would be beyond the scope of this proposal.

68. *Where selective cutting is necessary, it should only be done with horses.*

Response: This rule will determine whether road construction and timber harvest are allowed in inventoried roadless areas. Draft horses have been, and will continue to be used successfully in a number of instances on NFS lands to accomplish selective timber harvest where impacts from standard logging machinery are unacceptable. They are not effective, however, on steeper ground where cable or helicopter logging systems can be used to minimize disturbance to the ecosystem. Specific harvest methods are better determined by site-specific project analysis.

69. *The Forest Service should address the cost/benefits of revegetating, stabilizing, and maintaining logged areas to bring them to maturity more quickly.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. The National Forest Management Act regulations require that the Forest Service ensure reforestation of harvested areas if the remaining trees and any naturally occurring seedlings would be insufficient. Foresters and forestry technicians survey and evaluate harvested areas to make sure that survival and growth rates meet management objectives.

The costs and benefits of revegetating, stabilizing, and maintaining logged areas to bring them to maturity more quickly would be beyond the scope of the decision as described in Chapter 1 of the DEIS and FEIS.

70. *Large logging corporations do not practice forest stewardship.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Timber harvest and other ground disturbing actions on National Forest System lands are subject to analysis and approval by Forest Service managers under the National Environmental Policy Act (NEPA). Best Management Practices (BMP's), regulations, and contracts are used to

implement those decisions and regulate commercial practices.

71. *An international committee should be established to certify that timber is harvested in an ecologically sound way; the import of non-certified timber should be prohibited.*

Response: The purpose and need for the Forest Service Roadless Area Conservation EIS was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Whether or not timber is harvested in an ecologically sound manner either domestically or on foreign soil would be beyond the scope of the decision.

72. *The Forest Service should honestly state whether it is managing for tree farms or forests.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. The National Forest System (NFS) was established by the Organic Administration Act, for the purposes of providing favorable water flows and a continuous supply of timber. Additional management direction comes from the National Forest Management Act (NFMA), under which forest plans are prepared. How well the NFS and the forest plans achieve their stated objectives is beyond the scope of the decision.

73. *The Forest Service should halt logging of any stand of trees 200 years or older and greater than 10 acres.*

Response: This suggestion lies beyond the scope of the rulemaking because the proposed rule only addresses activities within inventoried roadless areas. Timber harvest and road construction decisions outside of inventoried roadless areas will be made in the forest and grassland planning process at the local level.

74. *The Forest Service should restrict logging to trees 8 inches in diameter or less; and*

75. *The Forest Service should not inhibit new inventive types of harvesting techniques currently available. The effects of alternative treatment methods and strategies should be analyzed.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and

in Chapter 1 of the FEIS. Local Forest Service managers and resource specialists evaluate timber harvesting practices in the context of how well they will meet the forest plan standards and guidelines and the multiple resource objectives for a site-specific landscape or project area.

Alternatives 1, 2, and 3 (DEIS pp. 2-3 through 2-5) of this analysis allow for some level of timber harvest. Alternative 1 places no additional prohibitions on timber harvest beyond those in the applicable forest plan. Alternatives 2 and 3 prohibit road construction and reconstruction, but place no constraints on harvest methods. If harvest techniques that will meet the forest plan standards without constructing roads are, or become available, those techniques could be applied. Decisions to use specific timber harvest methods or techniques outside inventoried roadless areas are made at the local level rather than within the scope of this analysis.

76. *The Forest Service should contract management of our forests to commercial timber companies and oversee their usage.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Whether or not management of some or all of our national forests is accomplished by contract is beyond the scope of the decision.

77. *The Forest Service should not subsidize multinational timber companies by shipping harvested trees overseas.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Whether or not future exports of logs from National Forest System lands should be allowed is beyond the scope of this analysis.

Timber Sales

78. *The Forest Service should discontinue giving individual private timber and land companies timber credits.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Fiduciary management of

funds associated with timber sales is beyond the scope of the decision.

79. *The Forest Service should increase fees for tree harvesting in National Forests.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Forest Service timber sales are appraised according to established procedures, which use the appraisal as the minimum acceptable bid, and sell to the highest bidder at public auction. As the number of bidders increases or decreases, prices for timber vary accordingly. The selling prices for Forest Service timber and the process used to determine them are beyond the scope of the decision.

Funding

80. *The Forest Service should dissolve the link between agency funding and timber harvest.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. The agency and timber harvest funding mechanisms are outside the scope of the proposal identified in Chapter 1 of the DEIS and FEIS.

81. *The Forest Service should establish a Federal fund for seeding trees to promote sustainable timber harvest.*

82. *The Forest Service should revise funding by repealing the Knutson-Vandenburg Act of 1930.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Federal funding for reforestation is presently through the Reforestation Trust Fund which is from tariffs on imports, from timber sale receipts collected by the Knutson-Vandenburg Act, and from funds appropriated annually by Congress for the purpose of reforesting areas though seeding, planting, or other methods that are denuded of trees because of harvesting or wildfire. Funding sources for reforestation are beyond the scope of the decision.

83. *The Forest Service should establish funding for personnel to enforce timber harvesting regulations; and*

84. *If timber companies are to receive subsidies, they should go through the official process of governmental review and oversight and should not receive subsidies from the Forest Service.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Funding for timber sales, administration and road design is appropriated by Congress each year. Some funds are also made available from the Salvage Sale Trust Fund established by Congress. Salvage Sale Trust Funds are collected from purchasers of Federal timber, and held for the purpose of planning and administering Forest Service timber sales. Roads are constructed, reconstructed, and maintained by timber sale purchasers when they are needed to remove logs they harvest. Funds appropriated or authorized by Congress are reviewed annually during the appropriation process. Funding processes for timber sale road design, construction and administration are beyond the scope of the decision.

Insects, Diseases, and Forest Health

85. *Importing forest products will result in the release of forest pests.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Forest health issues associated with insects and diseases were discussed in the DEIS, pp. 3-12, 3-97 through 3-98, 3-107 through 3-111. Forest health issues are also discussed in Chapter 3 of the FEIS. Whether imported forest products would increase the number of exotic pests within U.S. forests is uncertain due to multiple variables, but because any increase in imports would be slight, the potential risk of increased insect pests would also be slight. See also Response 30.

86. *The Forest Service should reconsider the use of Bt spray on Tussock moth because it kills other insects.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Forest health issues associated with insects and diseases were discussed in the DEIS, pp. 3-12, 3-97 through 3-98, and 3-107 through 3-111. Forest health issues are also discussed in Chapter 3 of the FEIS. Whether or not a

specific insecticide is used to suppress Douglas-fir tussock moth within U.S. forests is beyond the scope of the analysis.

87. *The Forest Service should allow roads to help kill goose berries which spread blister rust.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Forest health issues associated with insects and diseases were discussed in the DEIS, pp. 3-12, and 3-97 through 3-98, and 3-107 through 3-111. Forest health issues are also discussed in Chapter 3 of the FEIS. Gooseberry eradication was widely attempted during the 1930's through the 1950's in an effort to contain white pine blister rust. The practice was found to be ineffective. Specific methods employed to suppress insects or diseases that may occur across forested landscapes are beyond the scope of the decision.

Private Lands

88. *For every acre harvested the harvester should replant both the harvested area and an additional acre on public or private land.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. As disclosed in the DEIS p. 3-112 and in Chapter 3 of the FEIS, the volume of timber has been steadily increasing on all forest lands since at least the mid 20th Century. The proposed action addresses only management of national forest lands. Management of private lands, and whether or not additional planting of national forest lands is either needed or desirable is beyond the scope of the decision.

89. *The government should not be in competition for timber with private individuals.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Management of private lands, and whether or not additional timber harvested from national forest lands competes in any way with timber sold by private individuals is beyond the scope of the decision.

Reforestation

90. *Reforestation should be carried out with more than one species of tree.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. As disclosed in the DEIS p. 3-172 and in Chapter 3 of the FEIS, species composition of areas planted after timber harvest or wildfire is similar to that which would be expected in naturally regenerated forests. The species composition of planted forests is beyond the scope of the decision.

Forest Products

91. *The use of wood alternatives including hemp, henna, soybeans, pumice-crete and steel, should be encouraged and overall consumption cut back.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Demand for wood products was disclosed in the DEIS pp. 3-182 through 3-191 in the FEIS Chapter 3. Encouraging the use of wood products alternatives is beyond the scope of the decision.

92. *The Forest Service should address the effective use of harvester/forwarders.*

Response: Most decisions on the appropriate categories of equipment used for harvesting timber is made on a site-specific basis by local District Rangers and Forest Supervisors. Capability of individual logging systems, and the extent that individual systems are used or not used is not within the scope of the decision.

Suitability

93. *The law should clearly state that if the trees can't be replaced within 25 to 30 years maximum, then they should not be cut or considered a legitimate harvest.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. The National Forest Management Act of 1976 requires that where timber

harvest occurs with a commodity purpose, that areas cut must be capable of being reforested within five years. Consideration of any legal changes to the period during which reforestation must occur following harvest would be outside of the scope of the analysis.

Heritage Resources

94. *The Forest Service should encourage the preservation and reuse of old buildings and allow for green spaces in cities.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. The preservation of old buildings and specific land use regulations that govern private lands in and near cities are beyond the scope of the decision.

Recycling

95. *The Forest Service should subsidize recycling not paper making.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Whether or not the Forest Service should subsidize recycling of paper, and whether or not existing laws under which the Forest Service operations should be amended to allow the Forest Service to do this is beyond the scope of the decision.

Roads

96. *The beneficiaries of timber harvests should shoulder the major cost of road construction and reconstruction; and*

97. *The Forest Service should allow logging and resort activities with the stipulation that these private companies have to maintain the roads, trails, and campgrounds.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. In most cases private companies who purchase Forest Service timber are required to construct as well as maintain roads they use to remove any timber they purchase. Most roads and many trails on the national forests were built by

companies that purchased Forest Service timber sales. Maintenance of trails and campgrounds is accomplished with appropriated funds, with funds collected from users of those facilities, or by volunteers. Funding and maintenance for roads, trails, and campgrounds is beyond the scope of the decision.

98. *Roads associated with timber harvest projects should be built to minimum standards, restored to natural conditions upon completion of the project, and paid for by the timber purchaser.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Road construction standards are designed to minimize or prevent unacceptable resource impacts. New and reconstructed roads are designed to meet or exceed minimum standards. Purchasers of Forest Service timber pay for the cost of road construction and reconstruction needed to safely remove logs in an environmentally sound manner. The cost to the purchasers of constructing or reconstructing roads is reflected in bid values for Federal timber sales. Assignment of the costs of road construction and reconstruction is beyond the scope of the decision.

Prescribed Fire and Fuels Management

99. *The Forest Service should use timber harvesting as a means to control fire instead of prescribed burns. Harvesting provides some economic benefit while prescribed burns do not.*

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Fuels management and wildfire were discussed in the DEIS pp. 3-98 through 3-107, 3-149 through 3-159, and in Chapter 3 of the FEIS. The DEIS p. 3-156 disclosed that there would not be an increase in the number of wildland fires escaping because of a national prohibition on road construction and reconstruction in inventoried roadless areas. Pages 3-101 through 3-107 of the DEIS and Chapter 3 of the FEIS discuss fuel treatments and needs in moderate to high fire risk inventoried roadless areas and the expected effects of each prohibition alternative. Given current budget levels, it is impossible to treat all areas that are rated as being at risk. Whether to use timber harvesting or other methods of mechanically reducing accumulated

fuels is a site-specific analysis decision and is not within the scope of the decision.

100. Slash from logging operations should be removed to reduce fire danger. How monies collected for removing slash for fire prevention purposes are spent should be explained.

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. Fuels management and wildfire were discussed in the DEIS pp. 3-98 through 3-107, 3-149 through 3-159, and in Chapter 3 of the FEIS. Congress has authorized the Forest Service to collect funds from the purchasers of Federal timber. Funds are deposited to a Brush Disposal Trust Fund, and are expended to abate slash created by as a result of timber harvesting. Whether to remove slash from a project site, and the amount of slash to be removed or retained after treatment is complete, are site-specific questions not within the scope of this decision.

National Legislation

101. The Forest Service should support the National Forest Protection and Restoration Act (H.R. 1396); and

102. The Forest Service should not support Senate Bill 1608 which would require increased timber harvest to fund County schools.

Response: The purpose and need for the action was described in the DEIS on pp. 1-10 through 1-12, and in Chapter 1 of the FEIS. The Forest Service does not become involved in proposed legislation unless requested by Congress. Therefore, whether the Forest Service should support an individual Act of Congress would be beyond the scope of the decision.

End of Timber Section