

## Chapter 4

# Roadless Area Values (Question 6)

**Question 6: Describing Values.** What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates inventoried roadless areas?

This chapter includes five main sections: Characteristics of Roadless Areas, Environmental Values, Social Environment and Values, Economic Environment and Values, and Heritage Resources.

## Characteristics of Roadless Areas

This section includes three subsections: Characteristics of Roadless Areas General, Adequacy of Maps and Inventories, and Definitions.

### Characteristics of Roadless Areas General

#### Summary

**Evaluation of Roadless Areas** – Roadless area values and characteristics are a topic of comment to many respondents. Numerous respondents offer lists of values and characteristics they personally associate with roadless areas. Several people advise the Forest Service to undertake a comprehensive evaluation to determine roadless area characteristics and values. Others propose that the Forest Service consider current physical and geographical characteristics when these areas are evaluated. The values mentioned in this section are mostly those of roadlessness, rareness, location, and values in conjunction with a full range of uses. Reference to other roadless area values and characteristics, such as environmental, social, and economic values, can be found throughout the document in those related sections. A number of people comment that roadless area values were considered during past public planning processes, including the RARE processes, and that reconsidering these values now is a waste of time and money. Additionally, some suggest that certain values should not be considered now or should be considered in a separate process from other inventories or assessments.

**Adequacy of Analysis** – Respondents question the definitions of roadless area “values” and the analysis that will follow based on those definitions. For example, one respondent advises the Forest Service to define roadless values in a context consistent with other aspects of land and resource management plans. Others allege that the Forest Service is deliberately misleading representation of the inherent values of roadless areas regardless of their wilderness potential, and in so doing fails to provide a balanced recital of ecological services. Others request the

Forest Service examine the definition of various values, including perceived value, social value, and ecological value.

## *Evaluation of Roadless Areas*

### **431. Public Concern: The Forest Service should clearly state the benefits of having roadless areas.**

If we are locking these areas away for some reason, it should be explained fully and the benefits to the nation should be obvious. Someone should state the benefits of having roadless areas at all. (Individual, Olympia, WA - #A444.10112)

### **432. Public Concern: The Forest Service should undertake a comprehensive evaluation of roadless areas.**

#### **TO DETERMINE THEIR CHARACTERISTICS, RESOURCE VALUES, AND EFFECTS OF VARIOUS ACTIVITIES**

The following are some of the above categories you should address: 1. Inventory uses currently taking place that have not compromised the unit's roadless character. If their impacts have been acceptable in the past, there is no reason they shouldn't be acceptable in the future under managed conditions. 2. What activities take place on the roadless unit that are traditional and important to local culture; what role do these activities play in local economics? 2. What resources are present and how important are they to the local area and the nation? For example, the presence of important minerals might outweigh other concerns. Grazing might support local ranches. Wood harvest might stabilize raw material supplies for local mills. 4. What is the long-term effect of making resources on roadless lands essentially off limits, locally and nationally? Will more pressure be placed on commodity production from other countries without effective environmental protections? 5. Are the units identified as roadless in the inventories actually roadless? Some should be reviewed. Some units may be dropped and some might be added. 6. What recreation activities can be accommodated to given levels without unacceptable resource impacts? 7. What unique, sensitive, threatened or endangered species are present and how does the roadless area fit into its habitat picture? What activities can take place without causing harm to those species? 8. What is the relationship of the roadless unit to other lands, public and private; how might the roadless unit's management affect these lands and the uses they support? 9. What is the relationship of the roadless unit to adjacent special areas, including wilderness? 10. What is the relationship of the roadless unit to transportation systems, existing and planned, summer and winter? 11. What are the special environmental considerations, such as sensitive watersheds or unstable soils? 12. What is the best way to manage this unit of land in the public's interest? 12. Can the roadless unit be sustained in a healthy condition that doesn't pose threats to adjacent lands and resources? 14. What are the recreation opportunities the unit can provide under various management alternatives and how do these fit with the spectrum of opportunities in the region? 15. Does the unit have outstanding characteristics which make it suitable for addition to the wilderness system? 16. Does the unit have characteristics which make it outstanding as a place to conduct various recreation activities enhanced by a roadless setting, such as hunting, fishing, trail riding, sightseeing, rock climbing, etc. (Organization, Sandpoint, ID - #A6614.10110)

#### **TO CONSIDER SIMILAR CHARACTERISTICS**

In evaluating roadless areas, the Forest Service should always consider certain similar characteristics. These characteristics may be as minute as the space between varying species of trees and plants, or as inclusive as the overall appearance and health of the forest area. Regardless of scale, characteristics of the inventoried roadless areas should remain somewhat constant in representing the best interest of the forest.

Environmental values can play a bit more of a biased role in evaluating forest area. The main concern is the health of the ecosystem, yet it can be skewed as overprotection of resources. The concept is to keep roadless areas set aside for rare species, remote habitats, and free growth of the forest.

Representing different values, social and economic considerations can sometimes play against the greater interest for the forest. Social aspects of the situation might include accessibility, location, and natural appeal. Certain areas are more sought out than others due to natural beauty. Economic considerations might include the amount of timber in a certain area, or other resources. In order to better access the timber, more roads must be put in. Although, it seems that the best wood for timber surrounds the already existing roads, since those trees are younger and better kept.

Overall, the Forest Service should always look for certain factors while evaluating roadless areas. First, the area should be graded—so to speak—on the health of the forest. All species present should be taken into account. After assessing the health, areas should be checked for possible improvements. Most importantly, all plans for action in the forest should be aimed at sustaining the most ideal conditions. (Individual, Harrisonburg, VA - #A30138.45100)

### **433. Public Concern: The Forest Service should consider how roadless areas are characterized in evaluating roadless areas.**

#### **BY A WIDE RANGE OF FEATURES AND ATTRIBUTES**

What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates inventoried roadless areas?

This list might include; a. A complete inventory of renewable resources and production capability including forage, timber, fish and wildlife. b. An inventory of soil, water and geologic resources; an evaluation of their stability and suitability for various activities. c. An inventory of mineral resources. d. An inventory of sensitive, rare, threatened, or endangered species and their habitat. e. An evaluation of current activities and their impacts on the land and its resources. f. An evaluation of seasonal suitability for various activities, including motorized and non-motorized recreation. g. An evaluation of how potential recreation opportunities on the unit fit into or complement the regional spectrum of opportunities. h. An evaluation of forest health and fuel loading. i. Land ownership in and adjacent to the unit. j. A complete evaluation of the transportation system in and adjacent to the unit. k. Its proximity to designated wilderness and other roadless units. l. A thorough evaluation of renewable resources, productivity, sustainability and the importance of these at a sustainable level to local communities. m. Hazards to adjacent lands posed by various management alternatives. n. How is this unit of forest best managed in the public's interest, local and national? o. How important is this unit of forest to the long-term stability of local communities? p. What is the availability of roadless recreation opportunities in the region and are more needed? q. Can the roadless unit be managed in a healthy condition that doesn't pose threats to surrounding lands? r. What is its size and conformity; does it lie adjacent to designated wilderness; does it contain outstanding wilderness characteristics? (Individual, Boise, ID - #A5165.45100)

A more complete list might include: a) An evaluation of forest health and fuel loading, including forested areas at high risk from catastrophic wildfire. (Association, Coeur d'Alene, ID - #A22058.45100)

This list might include:

19. How will vegetative management options impact air and water resources?
20. What is the burning window for fuels treatment? (Association, Spokane, WA - #A21364.45100)

Relevant physical characteristics for the second-stage roadless area evaluations [following evaluation for wilderness designation] include, but are not limited to: ecological type, topography, soils, vegetation type and structure, wildlife, existing trails and other facilities; existing classified and unclassified roads, existing or potential old growth stands; streams and watersheds, TandE and sensitive species or communities, fire hazard rating, insect hazard rating, disease hazard rating, and proximity to private developments. (Civic Group, Roanoke, VA - #A1713.45100)

**BY THEIR INACCESSIBILITY**

There is very little private property adjacent to the roadless areas; the roadless areas are characterized by their relative inaccessibility. (Individual, Troy, MT - #A895.45100)

**BY BARREN LANDSCAPE, SCRUB-BRUSH, ROCK, AND ICE**

It should be pointed out that a minimal amount of productive old growth, low elevation forest was included in the Tongass Designated Wilderness areas. The vast majority of the "protected" lands in these units are barren landscape, scrub-brush, rock and ice in spite of the large appearing areas on the map. This mix is true in Region 1. As an ex-smokejumper I have had a birds-eye view of the composition of Wilderness Areas throughout Idaho and Montana. (Individual, Sitka, AK - #A1056.45100)

Also, these areas are not the pristine, remote, untouched back country that some imply that they are. Many are readily accessible to the general public by vehicle, etc., and have been for years; they are not all forested - many are front country scrub lands with few if any trees on them anywhere. If the general public really knew the truth about these areas, they wouldn't be so eager to blindly support any special classification for them. (Individual, East Kingston, NH - #A4893.45000)

**434. Public Concern: The Forest Service should consider various values when evaluating roadless areas.****THE VALUE OF ROADLESSNESS**

Roadlessness is a value in itself that should be conserved. Administrative costs for roadless areas will be lower than on more intensively-managed lands. (Individual, Lexington, VA - #A16989.45100)

The primary characteristic should be roadlessness, for reasons mentioned in the May 2000 DEIS. Roadlessness by itself is rare enough that no additional characteristics are needed to make an area special. (Individual, Oberlin, OH - #A16281.45100)

The ultimate consideration, to me, is the fact that no matter what values you associate with a roadless area, once a road incurs upon that area, the values are lost forever. This should be the cautionary guide you use to help you protect roadless values. (Individual, Lewiston, ID - #A29569.45100)

**THE VALUE OF RARENESS**

I believe these intact areas should be preserved in their natural state precisely because so few areas in the world remain intact. I believe this is their most valuable use to mankind, in both an aesthetic and economic sense. Rareness creates economic value, and an economy, based on those who come to see, live close to, study, or otherwise benefit from that rareness. (Individual, Sitka, AK - #A15506.45100)

The value of roadless areas lies in the very fact that they are unroaded. Some are more aesthetically pleasing than others but we have so few roadless areas left that they should all be left intact. Near me in the Eastern Hiawatha National Forest is the only roadless area here. It is not valuable because of its unusual beauty but because it is roadless [and] relatively rare. (Individual, Brimley, MI - #A15719.45100)

**THE VALUE OF REMOTENESS**

When evaluating Roadless Areas, the Forest Service should consider:

The remoteness of the roadless area (is it located near large cities, how many miles is it from the nearest metropolitan area with a population larger than 30,000). (Individual, Des Moines, IA - #A12587.45100)

**THE VALUE OF PROXIMITY TO COMMUNITIES**

Location. If an IRA is close (within eyesight) to a community, it has a higher value because it provides a backdrop or otherwise helps to physically define the community. It becomes part of the character of the community, and people identify with it and value its presence.

If an IRA is located on a Forest boundary (or a county, state, or international boundary), it has a higher value because it serves multiple publics. This recognizes that more people identify with a “shared” IRA and take pride that it’s “in their back yard.” (Individual, Libby, MT - #A2301.45100)

#### **THE VALUE OF THE OVERALL LANDSCAPE**

Roadless values should also be described in terms of the overall landscape. The present RACR views roadless areas as “islands,” and imposes a management prescription on those islands without any reference to how that management prescription connected with the broader landscape.

A much more sustainable approach to forest management would be to recognize that roadless areas are not “islands” valuable solely for their lack of roads, but instead are an integral part of a larger management scheme. In many areas, a landscape approach may determine that overall road density, rather than the presence of roadless area “islands,” is a better indicator of overall forest health and ecological sustainability. (Governor, State of Idaho - #A20141.45100)

#### **THE VALUES ASSOCIATED WITH WILDERNESS AREAS**

What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates roadless areas?

Is it truly a wilderness with very limited access or is it an area with other than wilderness values. (Individual, Sparks, NV - #A4805.45100)

When evaluating Roadless Areas, the Forest Service should consider:

The management prescriptions of areas contiguous with the Inventoried Roadless Area (is there a designated Wilderness contiguous with the area, etc.). (Individual, Des Moines, IA - #A12587.45331)

#### **THE VALUES ASSOCIATED WITH ROADLESS AREAS CONTIGUOUS TO AREAS WITH SPECIAL CONGRESSIONAL DESIGNATIONS**

Wherever a roadless area contains or is contiguous to a Congressionally designated feature (such as a national scenic trail, a wild or scenic river, or wilderness), the particular values associated with such areas should be emphasized. The presumption in all such cases should be that the roadless area at issue must be retained in roadless status. (Organization, Baltimore, MD - #A892.45000)

#### **INTANGIBLE AND TANGIBLE VALUES**

It is difficult to compare intangible values (such as wilderness) with tangible ones (timber value) but the forest service must in all of their decisions. Not only must it consider the present value of the intangibles but the future value as well which will only increase exponentially with population growth. The intangibles not only include wildlife habitat, clean water, clean air, but view-shed, sound-shed, and the ability of a person to escape into wilderness. (Individual, Glide, OR - #A22303.45100)

#### **IN CONJUNCTION WITH CONSIDERATION OF A FULL RANGE OF USES**

I feel that the full range of values normally associated with any tract of forest land should be evaluated. Roadless areas have opportunities for roadless recreation, specialized wildlife habitat, and other values that may not be available in roaded areas. These values should be evaluated but the roadless character should not preclude consideration of a full range of uses, including uses that would require development of roads or other access. The evaluation must be site specific and must be based on an updated mapping of National Forest roadless areas based on national criteria direction for delineation of an area as roadless. Delineation criteria must be open to public involvement and all future mapping must be “ground proofed”, again through an open process. (Individual, Colfax, WA - #A5421.45100)

The full range of values normally associated with any tract of forestland should be evaluated. Roadless areas have opportunities for roadless recreation, specialized wildlife habitat, and other values that may not be available in roaded areas. These potential uses deserve special evaluation, but the roadless character should not preclude consideration of a full range of uses, including uses that would require development of roads or other access. The evaluation needs to be site specific in the context of the value and use of the adjacent areas. In context with questions 3 and 4, above, the evaluation should include full

disclosure of the consequences of various management strategies on forest health and the susceptibility to fire damage. There should be specific identification of the potential impacts on adjacent private and public lands and communities. (Individual, Lawrenceville, GA - #A6196.45100)

Inventoried roadless areas have been subject to in-depth analysis and evaluation since the first Roadless Area Review (RARE I) in 1972. During development of the forest plans, the presence or absence of a road did not exclusively drive the decisions on land allocations, but more appropriately, decisions were based on examinations of the full range of values on these lands. This should be the same for future amendments and revisions of the plans. (Association, Augusta, ME - #A13312.45500)

The full range of values normally associated with the evaluation of any area of national forest land should be considered during planning for roadless areas. The mere fact piece of land contains no roads does not automatically mean it possesses inherent values that demand special protection. In an open process the Service should consider such things as existing and potential uses of roadless area, potential and actual impacts of roadless designation on both forest users and the local communities, proclivity to fire, insect and disease and impacts to surrounding tracts of land, whether public ally or privately owned, just to name a few. The evaluation needs to be site specific and include a full range of uses, among them full development To undertake this process up-to-date information is needed along with new criteria for defining a roadless area. Areas that are currently roaded (Not just by the new definition of a road) should be removed from the roadless area designation. (Business, Alturas, CA - #A17770.45100)

**435. Public Concern: The Forest Service should document the other major values and opportunities provided by roadless areas.**

We advocate consideration not only of roadless values in hearings and comment period. In addition there should be full documentation of the other major values and opportunities provided by these areas. These include groundwater recharge; erosion reduction and control; headwaters fisheries benefits; extensive outdoor recreation; visual amenities; wild animal resources; wild plant resources; select areas for endangered plant and animal resources; satisfaction of over twenty laws relating to biodiversity; and historical and spiritual values. (Civic Group, Roanoke, VA - #A1713.45100)

**436. Public Concern: The Forest Service should not allow the presence or absence of roads in an area to overshadow the appropriate consideration of other values.**

**SUCH AS HEALTHY FORESTS AND WILDLIFE HABITAT**

We are concerned that the presence or absence of roads in an area will overshadow the appropriate consideration of other values such as healthy forests and wildlife habitat. As an example, if an area is inaccessible for management, there may be a significant loss of important wildlife habitat through canopy closure. At the forest plan level, the analysis must consider these changes in wildlife habitat versus the need or desire to keep the area inaccessible. We do not feel that such analysis and consideration of site specific impacts can be done at the national level. In addition, forest plan analysis must consider other factors such as, water quality, scenic values, access to non-federal land, reliable and consistent supply of fiber, and a variety of recreation opportunities. Economic and social relationships should also be evaluated, including those that directly impact working families and local communities. (Association, Rockville, MD - #A13306.45100)

**437. Public Concern: The Forest Service should publish a compendium of submitted roadless values.**

**WITHOUT COMPILING ANY SCOREKEEPING STATISTICS**

First, invite public comment, asking individuals and other interested entities to list any number of different attributes and inherencies of roadless areas that are of interest/importance to them. Then compile a probably very lengthy inclusive list of these, which are in effect "roadless values". Then

publish the list for public review. Everyone will no doubt be surprised at some of the things that others favor as “roadless values”. For example, a prospector might highly value the generally less explored nature of inventoried roadless areas (IRA). A marriage counselor might have found that encouraging troubled couples to go hiking/camping in roadless areas has been productive. A published compendium of all submitted “roadless values,” presented without any scorekeeping statistics as to which were more often mentioned, could be useful in many ways, not all of which are predictable. Unanticipated benefits to any rulemaking process may occur from this proposed approach to saying what “roadless values” are. (Individual, Kalispell, MT - #A19139.15100)

**438. Public Concern: The Forest Service should periodically reevaluate roadless areas.**

**TO ASSESS CHANGE AND POTENTIAL IMPACTS TO ADJACENT NONFEDERAL LANDS**

Many factors need to be addressed before the Forest Service evaluates inventoried roadless areas. While those factors need to be consistently applied, local values and community social and economic considerations need to be made. These factors include past management activities, current land use, wildlife habitat and endangered species, cultural resources, accessibility, juxtaposition to development, timber production potential, water quality and quantity, fire hazard, potential for epidemic insect or disease outbreak, economic impacts, invasive plants, and recreational opportunities. These characteristics should be reevaluated periodically to assess change and potential impacts to adjacent nonfederal lands. (Governor, State of South Dakota - #A23354.45100)

**439. Public Concern: The Forest Service should consider that roadless area values were already identified.**

**DURING THE RARE PROCESS**

The characteristics, environmental values, social and economic considerations and other factors the FS should consider as it evaluates inventoried roadless areas were identified starting with RARE in 1972 and during the 27 years that transpired between the initiation of that process and the publication of the Roadless Area Conservation DEIS and FEIS. The answers to Question 6 are found in those documents. (Individual, Klamath Falls, OR - #A4970.45100)

**IN PREVIOUS PUBLIC COMMENT PERIODS FOR THE ROADLESS AREA CONSERVATION RULE**

The public process for the Roadless rule, conducted by the Forest Service, already identified roadless area values, including, large undisturbed landscapes, safe drinking water, recreation, rare wildlife habitat, weed and pest control, scientific study, and Native American observances. (Individual, Johnstown, PA - #A4762.45000)

The Forest Service has already adequately identified roadless area values through the public involvement process for the Roadless Area Conservation Rule. I believe roadless areas should:

- Provide sources of clean drinking water;
- Protect water quality for fishing and swimming;
- Function as biological strongholds for rare and native wildlife;
- Provide large, undisturbed landscapes important for protecting the web of life;
- Present quiet, back-to-nature opportunities for stepping outside of the hustle and bustle of daily life;
- Serve as barriers against the spread of weeds and pests into pristine areas;
- Offer opportunities for scientific study and research;
- Provide open space, clean air, biological diversity, and unspoiled vistas;
- Be free from logging, mining, gas and oil development or exploration, or other resource extractive activities;
- Preserve areas needed for traditional Native American religious and cultural observances.

Monetary values for such things are difficult to measure in today's financial definitions. These things listed above mean far more to me than resource extractive activities would. Yes, I use wood, oil, and gas, but there are already designated areas in the country for these activities to be undertaken which minimize the impact on nature, health, and the ecological system. There needs to be a balance, and the Roadless Area Conservation Rule moves to achieve that. Pristine, roadless, natural areas are hard to come by, especially around where we live, and I place a very high value on them. Once they are disturbed, they never fully recover. Ecosystems are unbalanced and the web of life is disturbed. (Elected Official, Urbana, IL - #A4881.45100)

The Forest Service has already adequately identified roadless area valued through the public involvement process for the Roadless Area Conservation Rule. Roadless areas include the economic benefits associated with:

- 1) recreational opportunities and tourism;
  - 2) commercial and recreational fisheries within the boundaries of National Forests and downstream and offshore;
  - 3) habitat for important game species and hunting both within and outside of the National Forests;
  - 4) water for cities, industries, businesses, and individual households downstream from the National Forests;
  - 5) the regulation of water flowing through rivers and streams, including flood control;
  - 6) non-timber forest products such as wild mushrooms, herbs, and medicinal plants;
  - 7) mitigation of global climate change through absorption and storage of vast amounts of carbon;
  - 8) enhancing the quality of life of neighboring communities;
  - 9) harboring biological resources that either have value now or have as yet unknown but potentially large economic and social value;
  - 10) harboring biological and genetic resources that can improve the long-term productivities of all forest land;
  - 11) pest-control services provided by species that prey on agriculture and forest pests, and;
  - 12) pollination services provided by species that pollinate important forest and agricultural crops.
- (Individual, Santa Fe, NM - #A22971.45100)

With one exception, there is no reason for further evaluation of inventoried roadless areas; the current rule already has taken these considerations into account. The single exception is if we want to expand the roadless areas. Otherwise, implementation of the rule as it is currently written is the best way to accommodate these considerations. (Individual, Denver, CO - #A12861.45000)

What were the values used to formulate the policy that you are trying to gut? It would take pages to adequately answer this question. The bottom line is that detailed values were laid down after 600 public meetings and the initiative as it stands now was a logical outcome given those values. Those values should be adhered to and not replaced by values skewed to favor those who would benefit economically from more roads. (Individual, Bozeman, MT - #A15299.45000)

The values that must be followed are the ones outlined in the original roadless area proposal. Get a clue—over a million people spoke up in support of a vast roadless area, this should be proof enough that millions more Americans favor and embrace environmental ethics that applaud natural beauty, abundance, and variety. The world we live work in should be respected and protected, not exploited and destroyed. (Individual, Colorado Springs, CO - #A17259.45000)

**AND IT IS A WASTE OF TAXPAYER MONEY TO UNDERGO ANOTHER PROCESS TO CONSIDER EXACTLY THE SAME VALUES**

The Forest Service has already extensively analyzed the values of roadless areas and weighed the benefits of protecting them in the process of promulgating the Roadless Rule. It is a waste of taxpayer

money to undergo yet another process to consider exactly the same values considered the last go round. (Organization, Boise, ID - #A8240.45000)

#### **ROADLESS AREA EVALUATION IN WYOMING WAS CONCLUDED WITH THE PASSAGE OF THE WYOMING WILDERNESS ACT**

The advance notice of proposed rulemaking dated July 3, 2001 states “The Forest Service has been evaluating roadless areas for nearly 30 years”. While this may be true Service-wide, this effort was concluded in Wyoming with the passage of the Wyoming Wilderness Act of 1984 (Public Law 98-550).

This public law states in Title II, the Congress has made its own review and examination of the National Forest Roadless Areas in Wyoming and the environmental impacts associated with alternative allocation of such areas. (Association, Cody, WY - #A26503.20206)

#### **440. Public Concern: The Forest Service should not consider environmental, social, and economic values when evaluating roadless areas.**

The Forest Service should not consider environmental values and social and economic considerations. It would only use them to reduce the area, to road it, or to log it. (Individual, Salem, OR - #A13948.45100)

Social and economic issues need not be considered for management of all portions of National Forest Lands. A significant portion of these lands should be maintained in a pristine state for preservation of existing ecosystems and support of alternative uses. (Individual, Seldovia, AK - #A23513.45000)

#### **441. Public Concern: The Forest Service should not evaluate roadless areas separate from its regular, on-going natural resource inventories and assessments.**

##### **UNTIL THE FOREST SERVICE PROPOSES AN ACTION THAT MAY AFFECT ROADLESS AREAS**

The Forest Service should not evaluate roadless areas separate from its regular, on-going natural resource inventories and assessments. The time to consider the unique characteristics of a roadless area in decision-making is when the Forest Service proposes an action that may affect a roadless area. Until that time, any evaluation of roadless areas is purely academic and of no utility to land managers or the public. (Union, Eugene, OR - #A6245.45100)

### *Adequacy of Analysis*

#### **442. Public Concern: The Forest Service should define roadless values in a context consistent with other aspects of land and resource management plans.**

The same criteria that are considered in other aspects of a land and resource management plan should be considered in the evaluation of inventoried roadless areas (i.e. watershed condition, wildlife, recreation, etc.). Additionally, “roadless values” must be defined in a context which is consistent with other aspects of the land and resource management plan. (County Department, Emery County, UT - #A30434.45100)

#### **443. Public Concern: The Forest Service should recognize that the Advance Notice of Proposed Rulemaking misrepresents the value of roadless areas.**

The ANPR implies that local decision-making is needed because protection is warranted for some roadless areas but not others yet never substantiates this. It states that most roadless areas previously were not recommended for wilderness designation due to low wilderness values or inadequate public support, and “other resource potentials.” This is a deliberately misleading representation of the inherent value of roadless areas (of which there is a huge body of literature left uncited by the ANPR) regardless of their wilderness potential. While evoking roadless resource potentials, the ANPR fails to provide a balanced recital of the ecological services provided by roadless areas. Instead, it observes that the

resource values of roadless areas “vary in importance,” specifically pointing out that roadless areas contain 9 million acres of “productive timberland.” (Organization, Aspen, CO - #A29614.11100)

**444. Public Concern: The Forest Service should assign value to actual scientific measured valuation, not “perceived” value.**

**BECAUSE YOU CAN'T PLACE A MONETARY VALUE ON ETHEREAL ITEMS**

I feel that a trend started in this area in the last few years attempt to place monetary value to ethereal items. The DEIS and FEIS both did this and attempted to show values for items that in reality are subjective. Value should be assigned on actual scientific measured valuation, not “perceived” value. Perceived value should carry some weight, however it should not outweigh hard physical values. (Organization, Huntsville, AL - #A13542.45000)

**445. Public Concern: The Forest Service should define social value and ecological value.**

The terms “social value” and “ecological values” need to be fully defined. Such terms are potentially explosive if they are subject to undefined individual interpretation and should not be used to make decisions on how to manage our National Forests. (Organization, Naperville, IL - #A20342.20202)

## **Adequacy of Maps and Inventories**

### **Summary**

**Maps** – In connection with the general evaluation of roadless areas, a number of respondents question the accuracy of maps and inventories. Several comment on the distribution of Forest Service maps. Others urge the Forest Service to provide and distribute more accurate maps; although some state that adequate maps were distributed. Many comment on mapping inadequacies, including the mapping of roads. A number of citizens offer suggestions for roadless area boundary adjustments. An organization and elected official urge the Forest Service to follow the guidelines required by 40 Code of Federal Regulations 1502.8 for document mapping in the use of plain language and appropriate graphics. One individual suggests roadless areas should not be delineated on a map because once these lands are designated it will be difficult to use those resources if they are needed in the future.

Additionally, numerous respondents question the accuracy of the maps used in the roadless area designation process. Many state that the maps were inaccurate. Many assert that specific roadless areas omitted from maps should be included and that the maps should be updated. Others request that roads be mapped accurately. Some people offer suggestions for improving the mapping process such as correcting past inaccuracies, ensuring maps are consistent with forest plans, and using Geographic Information System (GIS) technology.

**Inventories** – Roadless area inventories are a topic of comment to a number of respondents. They request the Forest Service complete or update the inventories in roadless areas. This includes inventorying infrastructure, developments, roads, and biological features and conditions. Others suggest areas they say should or should not be included after the inventories take place. Several ask that areas with roads be excluded from inventories; however, some suggest the opposite.

Many who comment about the accuracy of roadless area inventories state that these inventories are presently inaccurate and should be updated. Suggestions for updating inventories range from using uniform criteria to including other groups in the inventorying process.

## Maps General

### 446. Public Concern: The Forest Service should provide adequate maps.

The boundaries do not meet the test of a legal boundary in that they do not give any distances and directions from known land features or survey points. And finally they are generally not readily available to the public. A version at too large a scale to specifically determine whether an existing road is in or out of the roadless area is the only version generally available to the public. Detailed small scale maps are available only at Forest Service headquarters (with the exception of a limited number of forests that have put their GIS information on the internet). (Individual, Gold Bar, WA - #A28501.14120)

#### TO FOSTER INFORMED DECISIONMAKING

My husband and I are trail motorcyclists. We know many of the forests in Region One well, yet, none of the open houses or hearings we attended, nor any of the literature we could seek out either via the internet or in person, could even provide a single map at less than a very gross scale so we could determine how our interests might be affected. I know many people who did not comment at the time, and still can't because we never have seen site-specific information. (Individual, Bozeman, MT - #A19102.10135)

Roadless areas must be accurately mapped at the forest level, including an inventory of classified roads, in order that informed decisions can be made. (Elected Official, State of New Hampshire - #A18105.10135)

The Forest Service must analyze potential impacts on communities and private property and must give these national forest neighbors meaningful opportunities to comment on decisions about roadless areas and the wildland/urban interface that might place them at increased risk. Therefore, it will be essential that the Forest Service produce accurate maps of the location of communities and private lands within and adjacent to high-risk roadless areas and the interface. We note that the GIS database for the roadless areas did not have a complete inventory of private and state lands, so the public did not have an adequate opportunity to assess the proposed decision. (Association, Fernandina Beach, FL - #A15466.14500)

### 447. Public Concern: The Forest Service should distribute copies of the detailed maps of inventoried roadless areas that are currently on file in the Washington Office.

#### SEND MAPS TO REGIONAL OFFICES AND EACH NATIONAL FOREST FOR CITIZEN REVIEW AND BOUNDARY ADJUSTMENTS

Some opponents of the Roadless Rule complain that roadless areas are not sufficiently delineated on maps or otherwise described, so that the public does not know what exactly is protected under the Roadless Rule. The maps may not be perfect, but Colorado Wild believes they sufficiently describe the inventoried roadless areas.

Some updating and adjusting of boundaries may need to be done. The Forest Service should make this a priority in forest plan revisions and as part of each national forest's program of work. Also, copies of the appropriate detailed maps of inventoried roadless areas now in the Washington Office should be sent to at least every Regional office, and preferably also to each national forest containing roadless areas. That way, citizens could view maps of roadless areas in their state, national forest, or surrounding area. (Organization, Denver, CO - #A12008.10155)

### 448. Public Concern: The Forest Service should acknowledge that adequate maps were made available to the public.

It is disingenuous for the states, particularly Idaho, to claim that they were shut out of the decision making process because maps of the roadless area were not available to them. Maps of these areas have been available since the forest plans were signed in the mid to late 1980s. In addition, the EIS team did a tremendous job of making maps available by state and forest to the public and anyone else. If the final

decision had involved uninventoried roadless areas as well as inventoried roadless areas this would not have been true. (Individual, Grangeville, ID - #A798.10155)

In the past, during RARE I, RARE II, and the first round of forest planning, roads and logging were the principle issues in contention. This is no longer true. The most contentious decisions today are how to allocate unclassified roadless lands among fiercely competing, often incompatible, recreation interests.

Secretary Veneman's first "principle" implies that "accurate mapping" of roadless lands does not exist. Not true. Inventoried roadless lands have been mapped and catalogued for the past sixteen years in every Montana forest plan. They were posted at each roadless hearing and available on the web as well.

While mapping can always be fine-tuned with new technology, the fact is that the long-standing inventory was prepared at the local forest level, incorporating "local expertise and experience." Veneman is simply repeating another "common allegation" without factual merit. (Organization, Helena, MT- #A21370.45440)

#### **449. Public Concern: The Forest Service should recognize the inadequacy of maps in the Roadless Area Conservation Rule Final EIS.**

A key component of the Final Environmental Impact Statement (FEIS) is that portion of Volume 2 containing the maps. There existed confusion and misinformation pertaining to the maps that were part of the DEIS and remained in the FEIS, such that the public is not fully informed regarding the nature, extent, and scope of the Roadless Initiative, especially as it pertains to affected areas within the INF, including SSA. Unless and until there are specific delineated, detailed, and discernable maps attached to and made a part of a revised or supplemented circulated DEIS, the public will never have the appropriate and ample opportunity to analyze the decision documentation and comment thereon.

Even after issuance and circulation of the DEIS, maps were continuously being modified, newly published, and circulated. The mere effect of such an occurrence compels amending or supplementing the FEIS, recirculating it, and giving the public ample and appropriate opportunity to review and comment in accordance with NEPA and its implementing regulations. In the FEIS, the Forest Service never cured the deficiencies of the maps. (Business, Mammoth Lakes, CA - #A30296.14100)

#### **450. Public Concern: The Forest Service should adjust roadless area boundary lines where needed.**

Despite the burn in substantial portions of French Creek and Patrick Butte Roadless areas they deserve full protection of their timber, wildlife, and non-motorized resources. The Elkhorn Creek areas, which was recently cut, should be closed to the roaded area so as to keep wildlife migration viable. The Elkhorn Creek area is still hard to gain access to and should not be made easier. Lake and Partridge Creeks are the most pristine drainages aside from French creek, and all three should remain roadless in perpetuity. The boundary should be extended to include the BLM property to the Salmon River. Hazard creek and Hard Creek should be protected for anadromous fish and thus should not be logged along their length or be roaded. Their headwaters should also be protected where they are above the anadromous habitat. Granite Mountain, at the south end of Patrick Butte, is threatened by a ski area and further random skiing but should remain roadless at least through the next planning period. The boundary of the roadless area is adequate up past Grassey Lakes and by Scribner Lake, Lave Butte, and Hershey Point. Beyond that point the boundary in the hydrogeologic boundary of Partridge Creek.

In the French Creek drainage the roadless areas boundaries should follow Little French Creek as close as possible, skirting clearcuts and the road down to include the BLM property. From there the boundary following the French Creek road up to Burgdorf property. From there the boundary following the French Creek road on up to Burgdorf then to Nethger and Josephine lakes and Cloochman Saddle, following the paved road to near Copet Creek, missing Granite Reservoir and Fisher Creek Saddle then dipping south again to past Slab Butte and following along Brundage Mountain Road to near Hard Creek Lake and Upper hazard Lake and back to Little French Creek. The clearcuts along Little French and French Creeks should be managed to favor habitat management. The utmost concern should be taken to include the hydrogeologic boundary of French Creek, especially along Klip Creek, where no timber management should be undertaken. The Slab Butte, Bruin Mountain, and Little French Creek country

should not be managed for recreation, timber, or sheep, but rather for their plants and alpine habitat; it is fragile and in some cases burned. The management of wolves is problematic in this area; the wolves should not be relocated when they occur. (Individual, Boise, ID - #A21369.45624)

#### **TO FACILITATE THE ECONOMICAL MANAGEMENT OF ROADLESS AREAS AND ADJACENT LANDS**

The Forest Service should allow local forest-level decisions for forest health treatments, including timber removal to reduce the risks of wildfire, where such activities will not impair roadless values. Boundary lines should be adjusted where needed to facilitate economical management of the roadless area and adjacent lands. Mid-slope boundaries are expensive to locate and create impossible boundaries for prescribed burning and other management projects. (Professional Society, Missoula, MT - #A15793.30100)

The allocation process should provide for the adjusting the boundaries of the IRAs either smaller or larger to facilitate more logical, efficient, effective boundaries. (Individual, Missoula, MT - #A28297.30120)

#### **TO MANAGE AREAS THAT MAY HAVE BEEN ROADED AFTER RARE II**

The Forest Service should provide a process by which consideration could be given for the boundary of the Roadless Area to be modified to meet current conditions. In this instance, the boundary (which is derived from the 1979 RARE II Final Environmental Impact Statement) includes lands that are roaded and have been managed as such for many years. (Elected Official, Gunnison County, CO - #A22061.45100)

#### **TO SERVE ALL NEEDS**

Severability. The boundary of an IRA can be adjusted sometimes to serve both sides' needs. For example: a 30,000 acre IRA has an intact portion or "lobe" containing 5,000 acres of productive timberland. This productive portion could be "severed off," if needed, and allocated to the adjacent development. The remaining 25,000 acres could be protected for its roadless values. (Individual, Libby, MT - #A2301.45300)

#### **BY USING RELEVANT AND CREDIBLE INFORMATION**

Use all relevant and credible information on which to base the boundary of the Roadless Area—not just taking the 1979 RARE II boundary and considering it done. While the comments are relatively extensive for the West Elk Mine in Colorado, they are not for mines located on Forest Service lands located in Utah. Input on these operations should also be developed and considered. (Business, Wright, WY - #A23085.45400)

#### **BASED ON HISTORIC FACTORS INCLUDING OPERATING PRACTICES AND LAND MANAGEMENT**

Create a mechanism whereby any proposed Roadless Area boundary can be modified and revised based upon historic factors including operating practices and land management. (Business, Wright, WY - #A23085.45400)

Today, there are two active coal mines operating in this area, justifying the need to adjust the Roadless Area boundary in this area. (Business, Wright, WY - #A23085.45440)

### **451. Public Concern: The Forest Service should not arbitrarily adjust roadless area boundaries to accommodate current or future uses.**

#### **IN THE INVENTORYING PROCESS**

Having witnessed the White River National Forest roadless areas inventory, serious flaws in the inventory process have become quite apparent. Roadless area boundaries have been arbitrarily and capriciously drawn to accommodate current or future uses, despite the absence of any system roads. We have seen roadless area boundaries in the WRNF inventory exclude lands containing no roads because the Forest Service has its eye on the timber contained therein. Particularly alarming is the practice of allowing non-system, illegally created roads to disqualify areas as roadless. Furthermore, the current roadless inventory process is not an end-in-itself but rather an intermediate step in the process of

nominating land to Congress for wilderness designation. This structure encourages Forest managers to inappropriately combine capability and suitability in the process of mapping roadless areas. We have seen roadless inventories with boundaries drawn to exclude mountain bike trails because this use would be non-conforming with a wilderness management. Mountain bike trails are not roads and the lands around them had no roads either, yet, they were drawn out of the boundary. The Roadless Area Inventory process must be uniform nationwide and must be conducted as an end itself, not as a step in the process of wilderness designation. (Organization, Aspen, CO - #A29614.45000)

**452. Public Concern: The Forest Service should make roadless area boundaries obvious.**

**TO PREVENT LITIGATION AND DISPUTES OVER DIFFERING INTERPRETATIONS**

The area affected by a road seem to have all kinds of definitions depending on which whine factor the various groups seem to want to use. If the area is wanted for Wilderness there is one set of influence standards and there is one for wildlife, the list continues, but yet another if you want to lock up an area. It would seem appropriate that in areas with any sort of clearly defined topographic watershed features, such as creeks or ridgelines, those roads, once present, influence that entire area. It also seems apparent that as a road proceeds through watershed drainage the progress of the road's influence ends somewhere at the next obvious watershed divide defined element. I make this point because obvious boundaries are a must if litigation and disputes over interpretations are to be avoided. The Forest Service already spends far too much time in legal disputes without adding more. That means that areas with numerous four-wheel drive undesignated roads throughout the drainage area should not be declared roadless simply because the current roads don't meet the Forest Service test for vehicle passage. Vehicles had influenced these areas and the major action should not be [to] displace the users of these areas unless the resource impacts are very significant. (Individual, Cambridge, ID - #A11714.45513)

Loud moneyed local interests with schemes for destructive use of our forests are difficult for local planners to resist. For this reason boundaries are needed on the local planning that is necessary to implement and tidy up the roadless rule. For example, if some scrap of roadless forest is too viable, require an internal land swap of uncut roaded forest in which the roads can be abandoned. If the spirit of the roadless rule is maintained it is possible to be a little flexible about the details. (Individual, Pasadena, MD - #A17237.13210)

**453. Public Concern: The Forest Service should follow the guidelines required by 40 Code of Federal Regulations 1502.8 for document mapping.**

**IN THE USE OF PLAIN LANGUAGE AND APPROPRIATE GRAPHICS**

The maps used in the environmental document must be familiar and easily interpreted by the public. The public is most familiar with the Forest Visitors Map. The environmental document mapping must follow the guidelines required by 40 CFR 1502.8 which states that "Environmental impact statements shall be written in plain language and may use appropriate graphics so that decision-makers and the public can readily understand them". The maps must identify streams, road numbers, trail numbers, landmarks and key topographic features so that the public can easily interpret them. (Organization, Helena, MT - #A13226.10135)

In addition, the maps were at an insufficient scale to accurately assess the impacts of the proposed rule - additional maps and definitions contained in local forest plans had to be consulted. We highlighted that the Code of Federal Regulation (40 CFR 1502.8) direct that decision makers can readily understand them." We request that the maps and definitions be expanded and clarified. Upcoming local forest plans updates would provide an appropriate forum for clarifying local roadless rule applications and associated maps. (Elected Official, Mono, CA - #A18107.14100)

**454. Public Concern: The Forest Service should not delineate roadless areas on a map.****BECAUSE ONCE THESE LANDS ARE DESIGNATED, IT WILL BE DIFFICULT TO USE RESOURCES THAT MAY BE NEEDED IN THE FUTURE**

My recommendation for these so-called "roadless" lands:

Simply maintain the status quo; do not put a line on the map. There will come a day when the political pendulum will swing. There will come a day when we no longer depend on other countries to meet our needs. There will come a day when other countries will no longer allow us to treat them as mere colonies. Once lines are drawn on a map, options will have been taken away. It will be extremely difficult to erase those lines when we someday need to use those lands. (Individual, No Address - #A25635.45000)

**455. Public Concern: The Forest Service should adequately mark roads on maps and on the ground.**

We are concerned to know if the roads, once they are inventoried, will be properly marked on maps? Will the maps be readily available and circulated in the marketplace? Finally, will the roadways/trails have any type of marking designation on the ground? How can volunteers and other groups assist the forest Service in marking and maintaining these roadways/trails throughout the forests? We believe that once a proper inventory is done, that the inventory needs to be documented, properly annotated and updated on ALL maps throughout the forests. Roads and trails; once inventoried and designated, must be marked and signed. (Business, Haslett, MI - #AA4861.14000)

***Accuracy of Maps*****456. Public Concern: The Forest Service should accurately map roadless areas.****TO ACCURATELY IDENTIFY ROADLESS AREAS**

Imposing a one-size-fits-all regulation on roadless area management will inhibit the Forest Service's ability to participate in landscape restoration and risk-reduction efforts on our National Forests. To more effectively comment on how the roadless policy affects the State of Colorado, we request detailed maps from the U.S. Forest Service as to what is, and what is not, considered roadless by the agency. Once received, we will prepare more detailed comments. Clearly, there are many areas in Colorado that are roadless and deserving of such protection. Without clear maps the Forest Service cannot possibly identify them. With adequate maps, Colorado could help. (State Agency, Denver, CO - #A2332.14140)

**TO ENSURE THAT ELIMINATION OF FUTURE ROADS DOES NOT PUT FEDERAL AND PRIVATE TIMBER RESOURCES AT RISK**

Roadless areas should be mapped to assure that elimination of future roads is not putting federal and private timberlands at risk from uncontrollable wildfires, disease and insect infestation. (Elected Official, Plumas County, CA - #A4846.45000)

**TO ENSURE ADEQUATE ASSESSMENT OF THE PRESENT AND FUTURE IMPACTS OF ROADLESS AREAS**

In the past, the Forest Service has argued that those forests with plans in the final stages of the revision process should also be exempted from the roadless area policy. But upon closer analysis of forest plans, it is clear the revision process has not proven adequate in assessing either the present problems or future impacts of roadless areas. Under ideal circumstances, a National Forest would conduct an on-the-ground inventory of roadless areas and evaluate any potential impacts of proposed management activities within or adjacent to these pristine areas. However, many of these reassessments have been sloppy and inadequate. Cases in point:

The Targhee National Forest is adjacent to Yellowstone National Park and encompasses one of the most scenic and ecologically important areas in Idaho. In the required analysis of roadless areas, the Targhee National Forest simply photocopied old inventories, made marginal notes, and added just five pages of update to an inventory over a decade old. In addition, the forest plan revision failed to link the

importance of roadless areas with aquatic species such as the imperiled Yellowstone cutthroat trout. As a result, hundreds of thousands of acres of roadless lands will now be open to development based on an analysis completed almost fifteen years ago. Experience in the Targhee and other forests indicate that attempts at planning to protect roadless areas have failed.

Boulder Mountain on the Dixie National Forest in Utah is a 150,000+ acres uninventoried roadless area. Areas adjacent to Boulder Mountain comprise 60,000-80,000 acres of roadless lands that were not included in the Dixie inventory. All these areas should receive immediate protection and should not have to wait for the forest planning process.

In a 1999 citizens' inventory of the Manti-La Sal National Forest in Utah, 30 percent more roadless areas were found in the La Sal Mountains and 50 percent more were found in the Abajos than what is currently in the Forest Service's inventories. In a 1998 citizens' inventory of the Uinta National Forest 123,500 more acres of roadless lands were found than the Uinta's own 1999 inventory. These areas also deserve immediate protection.

Fishlake National Forest's Strategic Communication Director Linda Jackson, recently confirmed that the inventories from Utah's four National Forests not going through the revision process (Fishlake, Ashley, Dixie, and Manti-LaSal) are seriously flawed. Utah's National Forests are relying on roadless area inventories from 1979. More reliable inventories were conducted in 1983 but never completed due to the passage of the Utah wilderness bill. The timing was not coincidental. Utah's congressional delegation purposefully halted these inventories. (Organization, Nevada City, CA - #A4941.45400)

#### **TO ENSURE THAT MANAGEMENT OPTIONS CAN BE ACCURATELY ASSESSED**

It is absolutely essential that accurate maps of roadless areas and areas at risk of insects, disease and wildfires be completed so that management options can be properly assessed. (Individual, Irvine, CA - #A15580.30100)

#### **AS PART OF THE PUBLIC INVOLVEMENT PROGRAM FOR FOREST PLANNING**

The Forest Service needs to provide accurate, up-to-date maps of inventoried roadless areas as part of the public involvement program for forest planning. (Permit Holder, McCall, ID - #A15317.14100)

#### **BY GROUND VALIDATION**

National direction on the criteria for delineation of roadless areas must be provided to the field. This criteria should include standards for mapping classified and unclassified roads, mapping of forest health, fire and insect/disease risks, wildlife habitat, water quality, scenic values, access needs, recreational opportunities, timber values, wilderness attributes, etc. Using the above information, national forest should be remapped to accurately reflect their roadless areas with all mapping being ground validated. (Association, Colville, WA - #A3091.10135)

#### **INVENTORY AND MAP THE GEOGRAPHIC LOCATION OF ROADLESS AREAS IN RELATION TO THE OTHER SIMILAR AND DISSIMILAR AREAS AND ANY CULTURAL DEVELOPMENT**

The geographic location in relation to the other similar and dissimilar areas and any cultural development must be inventoried and mapped. (Individual, Evergreen, CO - #A19178.45330)

#### **MAP CLASSIFIED, UNCLASSIFIED, AND OBLITERATED ROADS IN AREAS THAT QUALIFY AS ROADLESS**

Each National Forest's Plan must, as a part of its next scheduled revision, include assessments that would "qualify" or "disqualify" each inventoried roadless area for such status. Those qualifying inventoried roadless areas would then be explicitly depicted on maps. Strict attention must be paid to road classifications in and around roadless areas by means of lists and maps of classified, unclassified and old obliterated roads. Based on local citizen input, establish a spectrum of active forest management methods and protection/preservation guidelines and, when applicable, assign them to each "qualifying" inventoried roadless area. (Organization, Moscow, ID - #A15318.45500)

#### **INVENTORY AND MAP CLASSIFIED ROADS FOR THE COLVILLE, OKANOGAN, AND IDAHO PANHANDLE NATIONAL FORESTS**

We would like to see the schedule to complete the inventory and mapping of classified roads for the Colville, Okanogan, and Idaho Panhandle National Forests. (Business, Colville, WA - #A2593.12400)

**457. Public Concern: The Forest Service should use updated maps.**

The Forest Service must first define up-to-date criteria for the delineation of roadless areas and not use maps that are outdated. The maps should be updated with current data as land management plans are revised. (Association, Ketchikan, AK - #A20443.13212)

**TO GIVE THE PROPOSAL CREDIBILITY AND TO ALLOW THE PUBLIC TO MAKE SPECIFIC COMMENTS**

KARE believes the areas within this proposal include many that are roaded, and in which the road access is being used for many multiple use activities. By changing the definition of a road, the Forest Service proposal identified many roaded areas as unroaded. The RARE II inventories are more than 20 years old, and many NFs have updated maps that clearly indicate new roads. By failing to use updated maps, the entire proposal lacks credibility, and prevents the public from being able to make specific comments. (Organization, Yreka, CA - #A8381.45400)

**458. Public Concern: The Forest Service should correct mapping errors.****TO INCLUDE ELIGIBLE ROADLESS AREAS**

As for any Forest Service mapping errors that resulted in leaving 1.5 million, currently roadless acres open to clear-cut logging and road building in the January 2001 roadless rule we suggest that these mapping areas be fixed if they have not already been fixed in order to provide protection for Neka Mountain near Hoonah as well as Little Seal Creek, Saltery Bay and Crab Bay in Tenakee Inlet and other affected areas.

These areas are traditional territories of the Huna Tlingit. Their use of these lands can be traced back thousands of years. They continue to rely on the resources of the land and sea for their subsistence and survival. What is happening on the part of the Bush Administration, The National Forest Service, and for the for-profit Corporations is shameful. We must have protection for roadless watersheds on the Tongass. Keep the Tongass in the roadless rule. (Director Tribal Resources, Hoonah, AK - #A3024.45623)

Forest Service mapping errors failed to include eligible roadless areas such as: Broad Finger, Broad Creel, Saook Bay, Poison Bay, Deep Bay, and Ushk Bay; and a recent court decision removed protections of important community use areas provided by the 1999 Tongass Land Management Plan, thereby increasing the importance of the Roadless Policy on the Tongass, with mapping error corrections. (Elected Official, Tenakee Springs, AK - #A3358.45623)

As a result of a FS mapping error, the January 2001 roadless rule mistakenly left open 1.5 million currently roadless acres to clearcut logging and road building -- areas traditionally used by local communities. The FS should fix these mapping errors and provide long term protection for Neka Mountain near Hoonah; Little Seal Creek, Saltery Bay and Crab Bay in Tenakee Inlet; Broad Finger, Broad Creek and Saook Bay in Peril Strait; Poison Cove, Deep Bay, and Ushk Bay near Sitka; and East Kuiu Island, including Reid, Alvin and No Name Bays, and Seclusion Harbor. (Individual, Worthington, MA - #A10381.45621)

The reason Texas National Forests do not have many Roadless Areas is due to excessive road construction, including phantom roads and fire lanes, and an unfair Revised Land and Resource Management Plan (RLRMP) in 1996 which used tactics that kept potential Wilderness Areas (RARE II) from being considered.

For instance, fewer roads were shown on the maps in the RLRMP for Roadless Areas than in the maps handed out at the June 2000 informational meetings. The impacts of all FS roads were supposed to be considered in the RLRMP. Apparently, someone miscounted the number of roads. The roads shown on the maps handed out at the June 2000 informational meetings were found to be overgrown and barely discernable in the Big Creek Scenic Area, one of the Roadless Areas designated in Sam Houston National Forest. These so-called roads reduced the acreage of Roadless Area in the Big Creek Scenic Area Roadless Area. (Organization, Bellaire, TX - #A883.10155)

**TO CORRECT AREAS ON THE TONGASS NATIONAL FOREST SHOWN AS “APPROVED FOR DEVELOPMENT”**

Accurately map roadless areas on the Tongass: Include those areas such as Poison Cove and Ushk Bay that on current roadless area GIS plots are shown as “approved for development.” They are not. Review all court decisions concerning individual sales on the Tongass made since the date of the first Roadless Rule and include those areas where logging has been enjoined or prohibited. (Individual, Tenakee Springs, AR - #A1758.45623)

**TO INCLUDE ADDITIONAL TERRITORY THE INVENTORIES EXCLUDED**

The first principle for protection and management of roadless values stated by the Secretary of Agriculture on May 4, 2001 says that decision making should be based on “reliable mapping” and “local expertise and experience”. The New Mexico Wilderness Alliance has recently performed new mapping of roadless areas and found much more territory than the inventories include. These areas should be added to the inventory in order to abide by the Secretary’s principles. Also, some of the inventoried roadless areas now contain roads. (Individual, Albuquerque, NM - #A4864.45440)

Identify roadless areas omitted from Forest Service inventories. (Individual, Paluose, WA - #A6756.45400)

**CORRECT THE MAP OF THE SANTA ROSA RANGER DISTRICT THAT SHOWS THE DISTRICT AS ROADLESS**

I live in Humboldt County, Nevada, and I am concerned about the Santa Rosa Ranger District map showing the district being virtually roadless. (Individual, No Address - #A29078.45621)

**IDENTIFY THE TRAIL IN THE THREE PRONG AREA THAT ENTERS THE MEADOW CREEK ROADLESS AREA ON THE NEZ PERCE NATIONAL FOREST AS A TRAIL RATHER THAN A ROAD**

The Nez Perce National Forest map available at the hearings and open houses shows a road in the Three Prong area that enters the Meadow Creek roadless area although none appears on the map we received from the Nez Perce Forest showing recent development. This route was previously not considered a road for purposes of the roadless inventory (either RARE II or the Forest Plan) as it was (is) permanently closed, the area is revegetating, and it is not a significant impact or maintained (used for “experimental” purposes?). This, it should not be considered as a road even though it has been assigned a number. It should more appropriately be listed as a trail. (Organization, Moscow, ID - #A22654.45524)

**459. Public Concern: The Forest Service should consider that past inaccuracies in determining roadless area boundaries may cause problems in the future.**

Let me start with #A10: and more specifically with the issue of roadless area boundaries. The current boundaries were derived from a process designed to inventory roadless areas and determine approximate areas involved. They were never intended to become legal boundaries. The boundaries are highly inaccurate (Individual, Gold Bar, WA - #A28501.10135)

**BECAUSE MAPPING ERRORS MAY PROHIBIT IMPROVEMENTS TO AREAS THAT SHOULD NOT HAVE BEEN INCLUDED IN A ROADLESS DESIGNATION IN THE FIRST PLACE**

These inaccurate boundaries have the potential to create problems in the future when usage dictates an improvement to an existing road that was not intended to be in a roadless area but was partially included due to mapping errors. My original comments noted a portion of US 12 in a roadless area. Rather than correct the boundary, the Forest Service added some additional language mitigating the problem with US highways. That begs the question of why it is in the roadless area to begin with and does nothing to resolve the problem with FS roads that are inadvertently in the roadless area. (Individual, Gold Bar, WA - #A28501.10135)

**460. Public Concern: The Forest Service should coordinate with adjoining Bureau of Land Management lands when making maps.**

There needs to be better coordination between adjoining National Forest and BLM lands when making maps, laying out trails, and establishing travel plans. Many times a trail is open in one jurisdiction but

becomes closed when crossing over the boundary to another jurisdiction resulting in an overall loss of motorized recreation opportunity. (Organization, Helena, MT - #A13226.15162)

**461. Public Concern: The Forest Service should ensure that Forest Visitors Maps are consistent with the Forest Travel Plan.**

**TO DECREASE VISITOR CONFUSION**

Conflict of uses is aggravated by Forest Visitors Maps that are not consistent with the Forest Travel Plan. All forest visitors need to clearly understand what areas, roads or trails are open for motorized travel and what areas, roads, or trails are closed to motorized travel. We have experienced a number of misunderstandings from both non-motorized and motorized visitors. The Travel Plan Map and Forest Visitors Map should be the same. Also, this combination map should include additional detail such as contour information so that the public can better determine the location of roads and trails that are open or closed. (Organization, Helena, MT - #A13226.15163)

**462. Public Concern: The Forest Service should use Geographic Information System technology to document and map the location of uninventoried roadless areas larger than 1,000 acres.**

GIS maps generated by conservationists document location of uninventoried roadless areas larger than 1,000 acres. They have been provided to the Forest Service. The agency has the same technology and, with the push of a button, could also generate such maps. (Organization, Moscow, ID - #A22654.45320)

**463. Public Concern: The Forest Service should consider that forests have not been accurately described or represented to the public.**

**OLD GROWTH AND SECOND GROWTH HAVE NOT BEEN ACCURATELY DESCRIBED**

The amount of second growth on National Forests including pre-Forest Service logging and fire events is generally under reported. There are much larger areas of logged over forests that are not represented as timber areas in Forest Planning Revisions. In mapping these areas are not represented as areas that have been already been altered a great deal by man. In reality, these areas do not possess many of the attributes that are so valuable in older mature forests, such as many dead snags per acre, and larger amounts of carbon sequestered in dead woody material. For example, on my districts on the White River NF, the designated timber areas in the new forest plan revision are only a few thousand acres. However, the areas that have been actively logged since the turn of the century and do not contain old growth forest attributes because of the past logging number in the tens of thousands of acres. Therefore, if someone looks at the forest plan revision map for 2001 one may conclude that the timber operations on the forest are a very small percentage of the Forest operations as a whole. However, if one looks at the total amount of logging and road building that has occurred and still has a cumulative ecological effect on the watersheds, the percentage would be much, much higher. Roadless designation is acting to protect many areas that still possess these older forest attributes and are allowing some areas to continue to acquire those attributes. (Individual, Penrose, CO - #A21448.45500)

It is quite clear by the comments supporting the maintenance of these areas in their "pristine roadless condition" that most of the people commenting have never seen the areas covered under this plan. If they had, they would know that these areas have been logged, mined and in some cases have roads, still in use, predating the formation of the Forest Service. . . . Over 30% of the Payette National Forest has burned over the past 10 years. Trees will not begin growing in much of the areas for 50 to 100 years because of the intensity of the fires. Almost none of these areas have had any trees planted following the fires. There is no plan to plant these areas because they are steep, have few roads and the Payette National Forest doesn't have the funds to plant new trees. They remain at high risk for repeat fires in the current condition. A second burn in these areas will further sterilize these soils so that trees may not grow for an even longer period of time.

The Roadless Area Initiative has been one of the biggest hoaxes carried off by the Clinton administration. By labeling these areas “roadless” and “pristine”, support has been gathered from people who have not and will never see these areas. Many of these areas do not have the types of “old growth” that the public is being lead to believe they support. (Individual, McCall, ID - #A29305.45100)

#### **TRAVELWAYS HAVE NOT BEEN ACCURATELY DESCRIBED**

The current data being collected by the evaluation team does not fully show the roaded nature of these areas as it does not include the many well established and utilized motorized travel ways.

In addition Non-FS Federal along with State and County Roads are not included in the Forest Service classified road system, so much of the areas considered as roadless now and in the future local Forests and communities will have to go through extensive studies to eliminate obviously roaded areas set aside by mindless beltway bureaucrats and politicians who don’t have a clue of what conditions occur on the ground. (Individual, Alturas, CA - #A28581.10135)

### *Inventories General*

#### **464. Public Concern: The Forest Service should inventory certain features in roadless areas.**

##### **INVENTORY AND EVALUATE ALL NATURAL RESOURCES AND THEIR POTENTIAL VALUE, INCLUDING EXTRACTIVE MINERALS**

Describing Values: In evaluating and inventorying “roadless” areas the USFS must inventory and evaluate ALL natural resources and their potential value, including extractive minerals. Our nation is rapidly running out of the strategic mineral resources vital to sustaining our society. The U.S. is becoming more dependent on foreign suppliers of these critical mineral resources. The USFS must evaluate the real cost to society of closing off potential mineral areas with “roadless” designations. (Individual, Tucson, AZ - #A5625.45000)

##### **INVENTORY ALL INFRASTRUCTURE AND DEVELOPMENTS**

Require an inventory of all developments including: roads, routes, travelways, trails, cabins, or other human caused development or disturbance.

In order to make informed planning decisions on the future management of roadless areas, it is essential that all information be available to the decision makers. For this reason, it is essential that all evidence of human use or development should be identified and mapped. This proposal would require that a complete inventory be conducted before a management plan is developed. (Organization, Salt Lake City, UT - #A12009.45400)

##### **INVENTORY AND GROUND VALIDATE EACH ROAD AND TRAIL TO DETERMINE ITS RECREATIONAL VALUE AND ANY PROBLEMS REQUIRING MITIGATION**

Each road and trail should be inventoried and viewed on the ground to determine its recreational value and any significant problem areas that require mitigation measures. Each road and trail should be evaluated for its value as a motorized loop or connected route. Each road and trail should be evaluated for its value as a dispersed campsite or as access for all multiple-use visitors. Every problem has a solution. Every impact has a mitigation measure. Roadless Rule alternatives should be developed with the objective of including as many roads and trails as possible and addressing as many problems as possible by using every mitigation measure possible. (Organization, Helena, MT - #A13226.45400)

##### **INVENTORY TOPOGRAPHIC AND PHYSICAL CHARACTERISTICS**

What are the characteristics of the land to be considered? All the topographic, and other physical characteristics. The existing and potential flora and fauna must be inventoried and mapped, the geographic location in relation to the other similar and dissimilar areas and any cultural developments must be inventoried and accurately mapped and described, the size of the area is very important. (Individual, Manhattan, MT - #A21848.45100)

The roadless areas identified by the final rule cover 58.5 million acres. This large expanse of area covers broad ranges of ecosystems and forest types. Each individual unit of forest needs to be fully examined and analyzed to gain a complete understanding of the characteristics that define that forest. Specific characteristics include: tree types, other vegetative cover, wildlife present, soils, hydrology, topography, and climate. However, other characteristics not related to the environment should be considered also. These include the specific uses of the forest, the users, and how the land and resource management plan addresses those concerns now.

Specific environmental values to be considered are the value of the ecosystem for wildlife protection, recreation, aesthetics, watershed protection, and overall health of the ecosystem. Each individual unit of forest has different environmental values that should be taken into consideration when making individual decisions about that specific forest and how it should be managed. (Association, Washington, DC - #A28689.45000)

#### **INVENTORY FOREST HEALTH CONDITIONS**

Prior planning for immediate access into inventoried roadless areas is imperative. Additionally, the current status of Forest conditions must be inventoried and mapped, e.g., dense stands in need of thinning; areas of heavy fuel build-up and in need of controlled burning. (Individual, Fort Collins, CO - #A17987.30410)

#### **INVENTORY VALUES, SOCIAL AND ECONOMIC IMPACTS, AND LONG-TERM USES**

Delineation: Before any decisions can be made one must know what your decision is about. Any areas proposed for roadless designation must first be delineated on maps and then inventoried for the values they have, what social and economic impacts they may affect, and determine what is best in the long term for the land. Has this process been done for any, all, or some of the lands involved in the roadless rule? (Association, Columbia Falls, MT - #A18043.45100)

#### **INVENTORY ROADLESS AREAS, ROADED AREAS, CLASSIFICATIONS OF ROADS, AND PRIVATE ACCESS ROADS**

Before any proposal goes forward, the agency must fully inventory roadless areas, roaded areas, classifications of roads and private access roads. Additionally, the inventory must be accurate down to the forest level so that decisionmakers and the public can be fully informed. Most importantly, the agency must consider the economic and social impacts when considering any final action. (Organization, No Address - #A29917.45400)

#### **465. Public Concern: The Forest Service should specify when the uninventoried roadless areas are to be inventoried and clarify that existing management will not change prior to completion of the inventory.**

The Forest Service should clearly specify when the “uninventoried roadless areas” are to be inventoried and clarify that existing management is not changed prior to completion of the inventory. Absent a clear and strict time line, the failure to act could create additional gridlock in management of the National Forests. (Elected Official, Douglas County, OR - #A11811.45420)

#### **466. Public Concern: The Forest Service should delete roaded portions of inventoried roadless areas from the inventory.**

Roaded portions of inventoried roadless areas should be deleted from the inventory. (Association, Conroe, TX - #A8076.45400)

If an area is currently or previously roaded, it should be dropped from the Roadless inventory. (Organization, Maryville, TN - #A8754.45400)

Roaded portions of inventoried roadless areas should be deleted from the inventory. If these areas are not removed, existing roads should be maintained to provide access for fire mitigation and fire fighting activities. (Elected Official, State of Minnesota - #A15541.45512)

**467. Public Concern: The Forest Service should include previously inventoried trails in the present inventory.**

Return trails that used to be on the Forest Service trail inventory to the present inventory. (Organization, Helena, MT - #A13226.45400)

**468. Public Concern: The Forest Service should clarify that the existence of user-created routes is not an appropriate reason for removing a roadless area from the inventory.**

Prohibit Illegally Created Unclassified Routes In Roadless Areas.

The final rule should make it clear that the existence of user-created and other unclassified routes are not an appropriate reason to remove a roadless area from the inventory. (Organization, Missoula, MT - #A21359.90420)

**469. Public Concern: The Forest Service should consider a road that has appeared on a forest map for more than ten years to be a road.**

**FOR THE PURPOSES OF DEFINING ROADLESS AREAS**

Fifty-two percent of the designated “Inventoried Roadless Areas that do not allow road construction or reconstruction” in the State of Colorado are within the Rio Grande National Forest. This seems to be disproportionate for a single National Forest. In addition, until the definition of “Roadless” is clarified, designating areas is difficult. Saguache County Commissioners contend that if a road has been shown on a Forest map for more than ten years, it is a road for the purposes of defining roadless areas. (Elected Official, Saguache County, CO - #A28774.45500)

**470. Public Concern: The Forest Service should clarify the present status of lands classified as inventoried roadless areas—roaded or unroaded—since RARE II.**

The resort I work at, Sierra-at-Tahoe Snowsport Resort, has on its western boundary an Inventoried Roadless Area. Even though it is listed as IRA where road construction and reconstruction is allowed, there is also a section of IRA where roads are not permitted. There is no question that our resort has influenced the improved access to this land and thus has changed the character of the land since it was reviewed under RARE II in 1979. To that end, we are very interested to find out if any reclassification of land is anticipated in the near future. To assume that the land and its qualities have not changed in over 20 years is not logically understood. We would respectfully like to have access to all review documents completed on all land adjacent to Sierra-at-Tahoe permit area that was placed in either IRA roaded or unroaded since the RARE II work was completed. (Business, Twin Bridges, CA - #A8808.45440)

In 25 years, the RARE II areas have obviously changed. But RARE II was not updated for the Roadless Initiative. Rather, the RARE II areas were used as they were originally defined.

To address the changes that have occurred in 25 years, the DEIS had to define very confusing terms like “roaded roadless areas”, “unroaded roaded areas” and “unroaded roadless areas”. To make matters more confusing, the DEIS Alternative 2 has that the next round of Forest Plans will look at all National Forest areas outside the RARE II areas to see if more are suitable for inclusion into IRAs under this proposal. Thus, there may be millions of acres included that aren’t on the map. The DEIS is asking the public to comment on impacts on land which does not have a defined boundary. And this is not an insignificant amount of land that may eventually be included—this may more than double the amount of land included in some States, particularly in the east. The DEIS does not even attempt to explain this or estimate the increased areas that will be impacted.

The DEIS addresses this serious flaw by simply saying that local managers will define these areas at the next round of the local Forest Plan. How can the public be asked to comment on impacts on the lands that have not even been defined or identified? (Union, No Address - #A28881.45000)

What are your intensions in regards to the lands, which have been roaded since the last survey?  
(Individual, Walla Walla, WA - #A17698.45400)

**471. Public Concern: The Forest Service should not change current inventory information.**

**BECAUSE IT WOULD BE A VIOLATION OF THE NATIONAL ENVIRONMENTAL POLICY ACT**

The areas depicted on the roadless FEIS volume II are accurate and complete. These areas were inventoried through a complete public involvement process conducted through each Forest Plan. You can not legally change these inventories without violating NEPA. (Individual, Salt Lake City, UT - #A26984.45400)

**472. Public Concern: The Forest Service should require forests to survey areas not included in the Roadless Area Conservation Rule.**

**THROUGH THE NATIONAL FOREST MANAGEMENT ACT PROCESS**

The NFMA process can fill in whatever details are left over, but it should not be used to countermand the national policy set forth in the rule. One area in which the NFMA process would be especially valuable, however, would be in surveying the lands ignored by this rule (such as roadless areas below 5,000 acres in size, and formerly roadless lands that have been degraded by logging) for the purpose of identifying areas to be added to the roadless inventory, or to be rehabilitated to roadless status. Local forests should be mandated to conduct such reviews, using the NFMA process. (Individual, Pendleton, OR - #A30482.20201)

**473. Public Concern: The Forest Service should identify all roadless areas created or enlarged by road closures.**

Under the NEPA regulations an agency can not commit resources prejudicing selection of alternatives or otherwise limiting the choice of alternatives before making a final decision. We note that the Forest Service has been closing and obliterating roads with the stated intent to create larger unroaded areas. To ensure that the agency allows for proper review and comment by the public, we suggest that all roadless areas created or enlarged by road closures be identified. (County Attorney, Grant County, OR - #A17667.45510)

**474. Public Concern: The Forest Service should state who did the roadless inventory, and explain the methodology and criteria used to determine whether an area is roadless.**

Who did the inventory, how, what methodology was used, what criteria was used to determine "roadless"??? (Individual, Tucson, AZ - #A5625.10135)

*Accuracy of Inventories*

**475. Public Concern: The Forest Service should update the roadless area inventory.**

**BY USING CURRENT INFORMATION**

Forest lands should be re-inventoried for roadless values. The inventory upon which the roadless rule was based is outdated. The last inventory of roadless areas—RARE II—was completed in 1979. Circumstances and conditions within those areas have changed. Any roadless policy should be based on sound science, which, in this case, requires that forest lands be reinventoried prior to its adoption. (Individual, Eagle, ID - #A17754.45400)

As a 37 year veteran of the Forest Service, I served as a district ranger during both Rare 1 and Rare 11. The inventory then was flawed. Its main purpose was to inventory for potential wilderness. The Endangered Species Act did not weigh into the evaluation at that time. We were asked to inventory large areas that met certain lack of roads criteria. The productivity of the forest in the inventoried areas was not put into the equation. (Individual, No Address - #A20465.45410)

Our objection is based on two key points; 1. That the study conducted by the Clinton Administration failed to update the physical land conditions recorded in an inventory that was conducted in the late 1970's, and 2. Those conducting the study failed to inform the public that some of the areas they were asking the public to comment on were no longer roadless areas. Ignoring obvious facts in the study process resulted in misrepresentation of existing land conditions to the public, and a public response that was distorted because of this omission. This whole study became a centralized planning process that produced bad public policy due to inaccurate data, misrepresentation of factual information to the public, and conclusions that were based on factual and process errors.

In our opinion, response to the ten questions listed in the advanced notice of proposed rule making is meaningless as long as the two errors noted above stand. We urge the Forest Service to start the process over, correct an old inventory, and then conduct the study based on local conditions using the local National Forest planning process as the venue for local decisions. (Organization, Rhinelander, WI - #A19070.45400)

The previous "roadless" rule making was just a facade for a decision that was already made. Without any analysis someone got a burr up his butt and decided roadless should be roadless. The lines were drawn over two decades ago! That's at least a generation different. A road back then was something you could drive your father's Oldsmobile on. Today we have an abundance of four-wheel drives, SUV's, ATV's and motorcycles. What wasn't considered a road two decades ago, is now a major access to folks with these improved motor vehicles. We should not, and cannot use these old inventories as current best science. The "roadless" areas need to be re-evaluated with forest plan revisions. (Professional Society, Sheridan, WY - #A28276.45440)

Fishlake National Forest's Strategic Communication Director Linda Jackson, recently confirmed that the inventories from Utah's four National Forests not going through the revision process (Fishlake, Ashley, Dixie, and Manti-La Sal) are seriously flawed. Utah's National Forests are relying on roadless area inventories from 1979. More reliable inventories were conducted in 1983 but never completed due to the passage of the Utah wilderness bill. The timing was not coincidental. Utah's congressional delegation purposefully halted these inventories. (Organization, Missoula, MT - #A21359.45622)

#### **BY ALLOCATING MONEY TO IDENTIFY ROADLESS AREAS NOT CURRENTLY IN THE INVENTORY**

I am very interested in seeing that off-road vehicles be prevented from going into roadless areas, while monies should be allocated to identify roadless areas not currently in the Forest Service's inventories. (Individual, Fort Thomas, KY - #A11699.91221)

#### **BY INVENTORYING ALL RESOURCES**

All resources should be inventoried. The historic range should be evaluated, and current solid objectives considered to develop an adjusted desired future condition. There should be an analysis of current activities, and the resource impacts. Forest health conditions, fuel loadings, and burn windows must be reviewed. Historical motorized recreational use and impact should be analyzed. The possibility of road access, considering cost and environmental impacts, must be considered. Possible timber harvest systems should be studied. How will decisions impact local communities, and what job expertise is available in the area is a consideration. And last, how will vegetative management options impact air and water resources in the area. (Association, Kamiah, ID - #A3685.45400)

The other concerns we have are that the roads that were inventoried under Rare I and Rare II during the sixties and seventies need to be looked at to determine if they should have roadless designation. The areas on the Manti have presently used RS 2477 roads. We don't need more roads except to harvest

infested timber and manage the forest properly. (Elected Official, Sanpete County, UT - #A15546.45400)

All the topographic, and other physical characteristics: The existing and potential flora and fauna must be inventoried and mapped; the geographic location in relation to the other similar and dissimilar areas and any cultural developments must be inventoried and accurately mapped and described, the size of the area is very important. (Individual, Paradise, MT - #A11753.45000)

#### **BY INVENTORYING ROADLESS ACREAGE**

It has also been observed that entire roadless areas have been left out of the official list of inventoried roadless areas. There are quite a few environmental groups that have studied the actual roadless areas and have found evidence of gross underreporting of roadless acreage. Please solicit these groups for much more complete inventories. (Individual, Painted Post, NY - #A357.45400)

First the Forest Service needs to start with an accurate inventory of true roadless areas. For years the Forest Service has been barricading existing roads, intentionally leaving these roads off of maps and calling the area roadless. (Individual, Lewiston, ID - #A835.45400)

The inventory of roadless areas that the January rule relied on was completed in 1979. Since that time there has been over twenty years of activity, including forest planning. You are working with dynamic systems not static, plastic Forests. Many things have changed during the years since RARE II including fires, road building, campground development, watershed protection, and the list goes on and on.

Any consideration of conservation of roadless areas must begin with an accurate inventory of what is in reality roadless and undeveloped. Without an accurate inventory the whole exercise will again be a farce, and a violation of plain English. It will not have the respect of the stakeholders, only the small-minded special interest groups. So please start the re-examination with an accurate inventory that you can defend to the American public. (Individual, Ogden, UT - #A878.45400)

#### **BY INVENTORYING PREVIOUSLY UNIDENTIFIED ROADLESS AREAS**

I support protecting inventoried roadless areas from any development while dedicating resources to inventory unidentified roadless areas. (Individual, Asheville, NC - #A911.10150)

I would like to encourage the forest service to identify all the de facto roadless areas that were missed in this most recent inventory and add them to the protected areas. (Individual, Painted Post, NY - #A5297.10157)

Implement the rule as written. Then begin . . . evaluating other roadless areas which the Forest Service missed in their inventories and come up with a plan to protect them, too. (Individual, Olympia, WA - #A4503.10157)

Forest planning should identify uninventoried roadless areas per a consistent and inclusive criteria. Roadless areas should be mapped as starting at the edge of road corridors. Narrow strips of roadless and should be included, if they provide the only unmanaged habitat in the vicinity or the only connectivity between other areas. They should allow inclusion of stumps, logging units, and old roads no longer in use by normal highway vehicles. The guidelines need not be as strict as those for designated wilderness areas. Even with these signs of prior human disturbance, the ecological and recreational values are significant. (Individual, Chelan, WA - #A22174.45400)

#### **BY INVENTORYING AND MAPPING ROADS**

My husband and I regularly use a road in the "roadless" area in the Siskiyou National Forest. We use the road to access our mining claims. The road was built by miners in the early 1950s and since then has been used by miners and recreationalists of all kinds. It is a shame this road doesn't seem to count. It is not a super-highway, but works well even for two wheel drive vehicles. This road should be inventoried

and accurately mapped. There are many roads in the Siskiyou National Forest that are used which should not be closed or considered to be in roadless areas. The radical environmentalists in this area have already been quoted in the local newspaper saying these roads do not exist since they are in the “roadless area.” (Individual, Grants Pass, OR - #A5305.45400)

Inventory all roads currently in existence. Reevaluate whether or not these areas should really be designated “roadless”. Determine what sort of a road system is necessary for fire protection. Do not eliminate any of the existing roads. Take local needs into consideration before removing any roads or restricting travel in the IRAs. (Individual, McCall, ID - #A29305.45400)

In order to evaluate protection and management of inventoried roadless areas you must insure that all pre existing routes in the area have been inventoried and provisions are made in the management process to include routes that may have been excluded. What specific threat is exclusive/inclusive to the roadless areas? Best Conservation Management practices are mandated and applicable to all public lands. The special roadless designation itself segregates the American Public. (Individual, Santa Ysabel, CA - #A26392.45400)

In preparation for our ground-truthing fieldwork, we prepare field maps that show the known coverage of roads from the Forest Service’s digital and mylar layers. When we encounter a motorized route that is not on this field map, we label it as a ghost route. Of the 537 miles of road we traveled this summer, 73.6 miles were ghost routes.\* [Footnote\* all figures tabulated using Geographic Information System software, USFS and HCCA data.]

This example of incomplete information raises a question: How can we effectively manage what we do not fully understand? Before any sweeping decisions about the roadless areas remaining on our National Forests are made, it seems wise to first assess their locations, area, connectivity and dispersal. (Individual, Silverthorne, CO - #A22049.45440)

#### **BY INVENTORING CLASSIFIED AND UNCLASSIFIED ROADS**

Roadless areas must be properly and accurately mapped at the forest level in order that informed decisions can be made. In addition, a complete inventory of existing roads both classified and unclassified must be completed. (Individual, Grants Pass, OR - #A5305.10135)

You cannot manage land without a proper inventory of roads (classified and unclassified), the location of other ownerships whose access must be guaranteed. (Individual, Oroville, CA - #A17888.45400)

#### **BY COMPLETING A COMPREHENSIVE BIOLOGICAL INVENTORY**

Please do not rescind the Forest Service’s Roadless Area Conservation Rule and mandate that the agency do the comprehensive biological inventory which has never been fully done on public lands, insisting that Congress fund this baseline data before any further multi-use activities destroy something irreplaceable in the forest’s biological web. (Elected Official, San Miguel County, CO - #A4549.45400)

The best way to manage roadless areas is as follows:

. . . (6) Conduct a complete biological inventory of the public lands system, and make the results public. (Individual, Dallas, TX - #A18002.30200)

#### **BY USING UNIFORM CRITERIA**

In the forthcoming Forest Plan amendments and/or revisions, it is critical that all the inventoried roadless areas (and other unroaded areas greater than 5,000 acres) be accurately mapped using uniform criteria. At a minimum, this mapping should include all existing roads, both classified and unclassified, and those areas at risk of wildfire, insects and disease infestations. Given accurate information, including mapping, we feel that future management options can be developed and assessed for the total National Forest on a local basis. These decisions will determine what the long-term use of the roadless areas should be, from multiple-use to future wilderness. (Business, Colville, WA - #A3362.45400)

The Forest Service must first provide up-to-date criteria for the delineation of roadless areas. The criteria should be consistently applied to all forests and should include such factors as forest health, wildlife habitat, water quality, scenic values, access to non-federal land, and a variety of recreational opportunities. Roadless portions of inventoried roadless areas should be deleted from the inventory. (Business, Alexandria, VA - #A11684.10135)

NFMA provides sufficient direction for evaluation of roadless areas at 36 CFR 219. The Forest Service should utilize the existing NFMA planning regulations to determine what specific issues need to be addressed on a forest-by-forest basis.

The Forest Service must first provide up-to-date criteria for the delineation of roadless areas. The criteria should be consistently applied on all forests and should include such factors as forest health, wildlife habitat, water quality, scenic values, access to non-federal land, and a variety of recreation opportunities. Economic and social relationships should also be evaluated, including those that directly impact working families and local communities. (Tribal Corporation, Anchorage, AK - #A20340.45000)

The agency should provide up-to-date criteria for the delineation of roadless areas. The criteria should be consistently applied on all forests and should include such factors as forest health, wildlife habitat, water quality, scenic values, access to non-federal lands and a variety of recreational opportunities.

IRA's have opportunities for roadless recreation (motorized and non-motorized), specialized wildlife habitat, and other values that may not be available in roadless areas. These potential uses deserve equal consideration in the evaluation process, but the roadless character should not preclude consideration of a full range of uses, including uses that would require development of roads or other access. The evaluation needs to be site specific in the context of the value and use of the adjacent areas. The analysis should include full disclosure of the consequences of various management strategies on forest health, use opportunities, susceptibility to fire and impacts on adjacent private and public lands and communities.

The agency should also consider:

The nation's need for Timber

The existing recreational uses should be preserved

The opportunity to provide for motorized and mechanized recreation

The management prescriptions in areas contiguous to each IRA

The current and historic uses of the area

Any management decisions that are necessary to improve or maintain existing conditions. (Individual, Richfield, UT - #A30413.50200)

#### **BY USING A SCALE APPROPRIATE FOR PLANNING**

***Informed decision-making*** — *To ensure the rule is implemented with more reliable information and accurate mapping. This includes drawing on local expertise and experience through the local forest planning process.*

The identification of the roadless area should include mapping of the area at a scale appropriate for planning (normally 1:24,000). The roadless areas identified and mapped should be used to update the list of roadless areas identified and listed in the FEIS of the roadless conservation rule. (Civic Group, Roanoke, VA - #A1713.45400)

#### **BY HAVING AN INDEPENDENT THIRD PARTY COMPLETE A SCIENCE BASED INVENTORY OF ROADLESS AREAS AND FEATURES**

I recommend that the US Forest Service does not act in haste to implement a "Roadless Area Conservation" plan that is improperly developed and inappropriate to the needs of the specific forest being considered as well as the needs of the nation at-large. Complete, instead, a third-party review of "roadless" areas, and develop conservation of these areas using NFMA and NEPA. The Forest Service will undoubtedly receive many comments on this proposed action. (Individual, Reno, NV - #A21755.10130)

*Much work has been completed since the 1970s toward inventorying Forest Service lands. The results of this work can be used as the basis of an expanding inventory; supplemented with additional necessary work.* The Forest Service should specifically describe and inventory the physical areas that are proposed for “roadless designation. Subsequent to this the agency should carefully inventory and describe the legal (in-holdings and other designated areas), man-made structures and/or features (roads, buildings, dams, canals, etc), natural resource potential, environmental, social and cultural values or characteristics within the areas designated. This needs to be completed by an objective, science-based third-party review. (Individual, Reno, NV - #A21755.10137)

There appears to have been little objective study of the areas that have been designated as roadless. I know there was an effort by special interest groups to have field volunteers do on-the-ground surveys of areas that were included in the roadless area designations.

As most of the area under proposed roadless designation probably has air photo coverage, a systematic examination should be conducted by independent professionals before the discussion even proceeds.

Please contact me if there have been such studies conducted, so I and other interested parties can examine the results of such systematic surveys. (Individual, Aurora, CO - #A773.10135)

#### **BY INCLUDING LOCAL, STATE, AND FEDERALLY ELECTED OFFICIALS IN THE PROCESS**

Accurate mapping and inventory processes must be completed so informed decisions can be made. Local and state and federal elected officials must be included in this process. (Association, No Address - #A25990.45400)

#### **BY USING THE CRITERIA LISTED IN THE FOREST SERVICE PLANNING HANDBOOK**

One of the early steps in the revision of Forest plans is to update the inventory of roadless areas. The inventory should be conducted according to criteria listed in the Forest Service Planning Handbook. In many cases the Forest inventory of roadless areas conducted in accord with these criteria will be changed substantially from the inventory that was conducted during RARE II, which is the most current inventory for many Forests at this time. (Civic Group, Roanoke, VA - #A1713.45400)

#### **THROUGH STAND EXAMINATIONS**

Existing Roadless areas may be in desperate need of active management to reduce forest insect and disease incidence and fuels, improve forest tree vigor, provide for desirable flora and fauna species from both the ecological and from mankind’s perspectives, and to support local recreational and forest product utilization activities.

Obviously a complete inventory of forest stands and conditions must be made through the stand examination system and other inventory measures. Recreation potential evaluation must utilize accurate maps indicating cultural improvements as well as topographic features on a small drainage-by-drainage basis. The existing forest planning procedure is quite capable of this necessarily intensive inventory and analysis. (Individual, Paradise, MT - #A11753.45000)

Stand examination and other inventories must be made, and all existing and predicted future conditions must be accurately described and mapped. Only then can officials bring forth the data and provide necessary analysis to the interdisciplinary team and the public. (Individual, Paradise, MT - #A11753.30110)

#### **WITH CITIZEN INVENTORIES**

Another flaw in the Clinton rule was that it only addressed RARE II areas. As you know RARE II was litigated and the Ninth Circuit Court of Appeals found that the inventory was insufficiently site-specific and did not consider a sufficient range of alternatives. The UEC, as well as other environmental groups in the west, have been conducting roadless area surveys of National Forest lands. The UEC has surveyed all six of Utah’s National Forests and has found and documented an additional 70 roadless areas that meet all of the criteria for roadless designation. These 70 areas provide at a minimum (some areas are larger than the 5,000 acre minimum requirement) at least 350,000 additional acres of roadless lands that were not included in the RARE II inventory, and deserve protection under any roadless policy the Forest

Service implements. The Forest Service should make a concerted effort to obtain all citizen inventories, verify the documentation and add these areas to the RARE II inventory so they are all afforded the protection under any roadless policy. (Organization, Salt Lake City, UT - #A17170.10157)

The 1979 RARE II EIS did an extensive review of roadless areas in National Forests. The EIS noted that “The public was asked to suggest additions to or deletions from an inventory of roadless areas, and to suggest which should be used to evaluate those areas for wilderness or nonwilderness use”, (page iv). This same opportunity to suggest boundary revisions was NOT afforded in the rulemaking that culminated on January 12, 2001. Any future rulemaking must make that a clear directive. (Business, Wright, WY - #A23085.15100)

Another flaw in the Clinton rule was that it only addressed RARE II areas. As you know RARE II was litigated and the Ninth Circuit Court of Appeals found that the inventory was insufficiently site-specific and did not consider a sufficient range of alternatives. WildLaw, as well as other environmental groups, have been conducting roadless area surveys of National Forest lands. WildLaw has surveyed all of Alabama’s National Forests and has found and documented additional roadless areas that meet all of the criteria for roadless designation. The Forest Service should make a concerted effort to obtain all citizen inventories, verify the documentation and add these areas to the RARE II inventory so they are all afforded the protection under any roadless policy. (Organization, Montgomery, AL - #A27512.45300)

Inventoried Roadless Areas in Utah are woefully short of the actual acreage to be found. Every forest in Utah failed to identify all roadless areas. Historically the last round of FS planning took place at about the time of the 1984 Utah Wilderness Act. The forests in Utah believed that act eliminated their obligation to identify roadless areas in Utah during the last round of Forest Plans.

In the past we have submitted maps which identify roadless areas in the Moab and Monticello Ranger Districts in the Manti-La Sal National Forest. Field work completed by Red Rock Forests indicates there is much more roadless acreage than the FS identified with RARE II. We believe this is typical of all national forests in Utah with the possible exception of the Wasatch-Cache NF. That forest accomplished a good inventory in its last analysis of the current situation. We would be glad to share our maps with the Forest Service again if you wish. Shortly we will have the maps available in a GIS format which to local ranger district could use in planning. (Organization, Moab, UT - #A30528.45622)

I attended two of the National Forest Service Roadless Area Open Houses, the Sweet Home of WNF and the Suislaw NF in Corvallis, Oregon. **Neither of these informational meetings had maps detailing the “other smaller Roadless Areas” of less than 5,000 acres that were not inventoried or included in Appendix C of the NW Forest Plan.** Many of the public kept asking to see maps delineating “just what are the 1,000+ to 5,000 acre, non-RARE I or II Roadless Areas”? Some districts do have in their database, or even mapped in pilot studies the boundaries of the smaller RA’s. **This was a frustrating and bad omission on the part of the Forest Service to hold these informational RA open houses without public access to these maps.** Some FS staff claim that these areas are not inventoried, hence no maps available. If that is the case, district by district, I strongly suggest/propose that **all of these significant RA’s are updated with current inventories and mapped for consideration in this proposal. Much of the data for this already exists.** (Organization, Albany, OR - #A19057.10152)

#### **476. Public Concern: The Forest Service should integrate the best available information from its own road inventories.**

##### **BY USING CURRENT GEOGRAPHIC INFORMATION SYSTEM DATA**

In addition to maintaining the integrity of inventoried roadless areas, the rule should immediately integrate the best available information from its own road inventories. This can be done from existing information in most areas and should not be delayed. The Forest Service should use current Geographic Information System road inventory coverage’s to identify the many roadless areas over 5,000 acres that were not identified during past RARE and Forest Plan inventories. By simply taking a look, the Boise

National Forest recently identified three roadless areas over 5,000 acres (totaling 26,000 acres) that it had overlooked during earlier inventories. The new information for each National Forest nationwide should not be limited to identifying roadless areas over 5,000 acres however, but should also identify roadless areas between 1,000 and 5,000 acres that were never before considered important. These smaller areas are important for ecological reasons (see below for more details).

According to Interior Columbia Basin Ecosystem Management Project (ICBEMP) data, Idaho roadless areas have much greater ecological integrity than other Forest Service lands in the state. Of 12 million acres in Idaho that ICBEMP identified as having high ecological integrity, nearly 8 million of those are in roadless and Wilderness areas. These areas also protect 25 percent of habitat for Chinook salmon, steelhead, bull trout, and westslope cutthroat trout in Idaho, and provide 75 percent of the strongholds for all salmonid species in Idaho according to the ICBEMP. Roadless areas are also the most risky areas for development and subsequent erosion, containing nearly 30 percent of all of Idaho's steep slopes. (Organization, Nevada City, CA - #A4941.45440)

**477. Public Concern: The Forest Service should consider that there was an inconsistent application of data entry standards when roadless areas were inventoried.**

According to the Forest Service's own data, there are over 421,000 acres of private lands and 43,000 acres of State lands within inventoried roadless areas in parcels ranging in size from five acres to hundreds of acres. As noted above however, this database may or may not have been entirely accurate since we understand that there was inconsistent application of the data entry standards. Therefore, an accurate analysis of lands potentially affected by the roadless area regulation was impossible. (Organization, Rapid City, SD - #A17011.45400)

**478. Public Concern: The Forest Service should provide a physical description of the areas proposed for roadless designation.**

The Forest Service should specifically describe the physical area that is proposed for "roadless" designation. Subsequent to clearly defining the proposed "roadless" areas, the agency should carefully inventory those areas and describe the legal inholdings and other designated areas, man made structures and/or features (roads, buildings, dams, canals, etc.), the natural resource potential of the area (as described in ANPR Question 5 above), environmental characteristics, and social and cultural areas of value within those areas proposed for designation. Such descriptions should be as objective as possible and should not attempt to rate or prioritize the items described. Much work has been done since the 1970s in inventorying Forest Service lands. The results of this work can be used as the basis of this inventory, supplemented where necessary with additional work. (Association, Novato, CA - #A17652.45400)

## Definitions

### Summary

Both those who ask that the Roadless Area Conservation Rule be implemented and those who ask that it not be implemented ask the Forest Service to clearly define terms used throughout the rulemaking process. These include such terms as road, road building, roadless, and unroaded. Not only do respondents say these terms are problematic, they also request the Forest Service clarify the relationship between them. Another point of confusion mentioned is whether roadless areas contain roads or not.

**479. Public Concern: The Forest Service should define certain terms.**

#### ROAD

The definition of a road must be broadened to reflect the reality of what is on the ground. It is unacceptable to define a road such that only mechanically maintained/constructed roads qualify. Lots of

traffic passes through our national forests on roads that were not mechanically constructed. These roads should not be defined out of existence. (Individual, No Address - #A50.45200)

Your first question is not fair because you asked for the role of the forest service in “roadless” areas. The statement of roadless and your definition of a road in itself makes your task easier. I define a road as a two track road and that is where the debate begins. My definition of a road and your definition of a road is as different as the number of acres the forest service is looking at to change or enact your roadless management plan. (Individual, Elko, NV - #A4853.45200)

If the agency decides at this time to adopt “roadless protection” guidance or directives to be applied by agency personnel in the local forest planning process, those directives should address the following:

The definition of “road” should be clear. In deciding at the forest plan level what activities can take place within protected roadless areas, it should be clear what does and does not constitute a “road”. Consistent with the Clinton Administration’s approach in the January 12 Roadless Conservation Rule, ski trails and ski ways should not be considered roads. Likewise, temporary roads and/or roads used on a seasonal basis for maintenance purposes should not be considered “roads”. These are typically service roads with no public access for vehicle transport. (Permit Holder, No Address - #A5285.45200)

I would like to see the definition of a road changed to include all existing roads including all unmaintained roads such as two tracks. These roads have been used by hunters and anglers for generations and provide important access to most people as they can not walk or ride horseback into the “Roadless Areas”. This has been my biggest objection to the “Roadless Plan” from day one. (Individual, Casper, WY - #A5080.45514)

My first concern is for the appropriate identification and definition of what a roadless area really is. The current inventory has many roads in many of the areas. The current roadless inventory is based on some antiquated standards and it makes the procedural aspects inconsistent. The process of a consistently applied roadless determination has been tried several times but each time the process was based on a sort of predetermined agenda. I was involved in both RARE’s. Both had considerable variation in the interpretation of direction information and the application of definitions. Correction of inconsistencies and appropriate definitions of roads and their influence would be a place to start. That makes the footing more equal in the mapping and the terms must be consistently and sensibly applied and defined. I am aware that 3 Forests in the Intermountain Region have not handled the map corrections, interpretations and applications similarly. Above all, the definition about what constitutes a road must be looked at in a more practical way, as well as what is the extent of influence by a road. For example much of the western United States is traversed by roads referred to as “four-wheel drive roads”. These “roads” access numerous kinds of developments essential to the management and/or enjoyment of these lands. The “greens” (preservation organizations such as the Sierra Club/ Earth Justice/Earth First!, etc.) in their lawsuits and appeals recognize them and often refer to them as “ghost roads”. Many people of the West identify these areas and say that the roads are present. They correctly point out the areas are not unroaded and vehicle traffic is not uncommon. Many of these areas have, or until recently, had no vehicle restrictions in the management plans or traffic plans for the area. Many of these areas contain numerous roads of this type and are now in the areas mapped and inventoried as roadless. Timber sale areas with an extensive net work of closed logging roads are defined as roadless. Several areas with RS 2477 roads or poorly maintained access roads to private in-holdings or mineral rights exist. In-action by the agency to deal with such roads requires that they be determined as a road, regardless of definition. Your recent unilateral Roads Policy has not settled the issue of these roads. In fact your dogmatic use of the definitions has increased the public perception of ineptness. (Individual, Cambridge, ID - #A11714.45200)

Definition and consequent classification of a road should be *strictly* held to full circumstantial, contextual framework and historical origins of the road: I.e., roads constructed in part or in full to circumvent (intentionally or not) some ecological/biological considerations that would prevent, say,

timber harvest, roadless definition, inappropriate recreation developments, etc. should not be considered roads that would prevent serious roadless inventory considerations. In fact, such circumspect activities should be considered with appropriate penalty of the law. Looking at another but related area for just one moment, is not the spirit and letter of the Endangered Species Act (ESA) designed to prevent a trend toward listing??? Is not the roadless rule to accommodate similar processes (i.e., *reduce the trend* in road increase)??? (Individual, Ewen, MI - #A17662.45200)

#### ROAD BUILDING

“Road building” is repair/maintenance of existing roads “building”? or is building in a new road where none existed before “road building”???? (Individual, Tucson, AZ - #A5625.10135)

#### UNROADED

What is the meaning of the term “unroaded”? Roadless means there are no roads within a specific area and roaded means that there are indeed roads within a specific area. The term “unroaded” is not in the NFMA, nor in any approved regulation. This term is used for no other reason than to circumvent legal descriptions . . . of what constitutes a road that has been handed down in Federal Courts.

Under RS-2477 Rights-of-Ways, the definition of a road in part states that “the mere passing of people and goods constitutes a road”. There are at this time over 90 such Rights-of-Ways legally filed and recorded in the courthouses of Shoshone, Clearwater and Idaho Counties. There are nationwide conservatively probably over a thousand of such rights-of-ways filed and recorded that have not been addressed, other than the invention of what constitutes a road ignoring legal law. These have not been addressed anywhere in this proposal. (Organization, Orofino, ID - #A8393.45200)

The Agency needs to clearly define “unroaded characteristics.” (Association, Salem, OR - #A21754.45200)

Additionally, unroaded areas should be defined as tracts with more than 1,000 acres of contiguous land that is generally free of roads suitable for standard (2-wheel-drive/low-clearance) highway vehicles. Consistent with current Forest Service roadless area inventory policy, both categories should provide greater leeway for roads and other development features in eastern national forests. (Organization, Denver, CO - #A21367.45100)

#### ROADLESS AREA

My concern with the entire concept of roadless areas is that they are not scientifically defined. One has only to look at the United States Department of Interior Geological Survey maps of Elko County to realize that the area is not roadless. In my experience in traveling these roads, I have never found one that does not have a reason for existence. None are there for any purpose. Those that once were necessary, and now are no longer needed, have disappeared and been obliterated by time and nature. Wheeled access to Elko County is necessary for all the citizens. Even backpackers use these roads to reach wilderness areas. (Individual, Elko, NV - #A4868.45100)

It is clear that existing roads (classified, unclassified and temporary) are present in “Inventoried Roadless Areas,” but there is no guidance for “responsible officials” to use in determining the maximum threshold amount of roads that can be present in an area below which the area can still be considered for inclusion in the Inventoried Roadless Areas. This decision appears to be left to the discretion of the responsible officials and is, therefore, arbitrary in its nature. To promote uniformity and consistency through the National Forest System, what constitutes “roadless” relative to the presence of previously existing roads must be more clearly defined in the regulations. Item (5) under “Roadless Area Characteristics,” for example, could lead to the conclusion that the presence of any classified, unclassified or temporary roads would exclude an area from the “Inventoried Roadless Areas.” Yet, this is clearly not the case. The definitions of Inventoried Roadless Area lack clarity. (Organization, Fullerton, CA - #A3705.45513)

The starting point of my comment is that the condition of being roadless is an artificial and an unscientific basis for classifying land for the uses that will be allowed. After all, two-hundred years ago the entire western area was roadless, but that did not deter its settlement and use according to its suitability. The process was not perfect, but a vibrant and productive economy arose from decisions that were correct more often than not. (Individual, Missoula, MT - #A4987.45500)

Let us dispense with the rhetoric and cut to the meat of the issue. Let's give the hackneyed phrase "Roadless Areas" a rest. Because Roadless Areas represent the only inviolate remnants of unprotected public land, let's use "inviolable remnants" when addressing RARE II Inventoried Roadless Areas, if only for the purpose of this correspondence. (Organization, Republic, WA - #A6302.45100)

We advocate that the broadest possible definition of "roadless" be used and require a definition that is at least as broad as that used in the RARE II process. Some evidence of past human disturbance should not disqualify an area from being designated as a roadless area. (Organization, Cave Junction, OR - #A17235.45200)

Clearly, the Forest Service needs to reiterate and clarify the definition of "roadless area" and require individual forests to abide by it. We strongly urge the agency to clarify the roadless area definition to include:

All previously inventoried roadless areas except those that have subsequently been deliberately roaded by the Forest Service through a NEPA process; and

Similarly undeveloped lands (including small areas adjacent to designated wilderness and inventoried roadless areas) that were passed over in prior inventories or have subsequently been added to the National Forest System. (Organization, Denver, CO - #A21367.45100)

#### **480. Public Concern: The Forest Service should clarify the relationship between inventoried roadless areas, unroaded areas, and classified roads.**

##### Definitions

The Forest Service needs to clear up the confusion over the relationship between inventoried roadless areas, unroaded areas, and classified roads. Roadless areas should be defined to include:

all previously inventoried roadless areas except those that have subsequently been deliberately roaded by the Forest Service through a NEPA process; and similarly undeveloped lands (including small areas adjacent to designated wilderness and inventoried roadless areas) that were passed over in prior inventories or have subsequently been added to the National Forest System.

Additionally, unroaded areas should be defined as tracts with more than 1,000 acres of contiguous land that is generally free of roads suitable for standard (2-wheel-drive/low-clearance) highway vehicles. Consistent with current Forest Service roadless area inventory policy, both categories should provide greater leeway for roads and other development features in eastern national forests. (Organization, Missoula, MT - #A21359.45100)

##### The Forest Service Should Consistently Use Historic Definitions of Roadless Areas.

The Forest Service needs to clear up the confusion over the relationship between inventoried roadless areas, unroaded areas, and classified roads. We are concerned that the Forest Service underestimated the total roadless acreage in Region 2 by using an unsupported and inappropriate definition of a road. Both the Arapaho-Roosevelt and White River National Forests based roadless area inventories prepared during the forest plan revision process on a definition that conflicts with the RARE II definition of a road and the definition in the Forest Service Handbook. We suspect that this inappropriate definition may have been applied to inventories elsewhere in Region 2 and perhaps in other regions, and strongly urge the Forest Service to ensure that roadless area inventories are based on the appropriate definition in the final rule.

To the best of our knowledge, the Forest Service has for decades interpreted the term “improved road” to mean a route constructed and maintained for use by two-wheel drive, low-clearance vehicles. Despite these historic definitions, the White River National Forest recently completed an inventory as part of its plan revision using an overly restrictive standard that excluded from its roadless area inventory, areas that the Forest Service found were not capable and suitable for wilderness designation. This extremely restrictive standard included -- visual and auditory impacts from developed areas, defensibility of the area against prohibited uses, future planned timber sales, and existing motorized off-road vehicle use. None of these standards is relevant to any of the prohibitions or procedures in the proposed roadless areas conservation rule; therefore lands excluded from the roadless area inventory through the application of these irrelevant standards should be included in the rule making. For example, the Forest Service discounted all acreage within Copper Mountain Ski Resort’s master development plan boundary even though it is completely roadless. It also appears that the Forest Service did not include Independence Mountain adjacent to the Keystone Ski Area as roadless even though it is clearly roadless. (Organization, Denver, CO - #A21367.45200)

There is a distinct difference between “unroaded” and “roadless” areas. The rule does not clearly differentiate and keep those two categories separate. The roadless rule *should not* include unroaded areas. (Elected Official, Crook County, WY - #A15545.45200)

**481. Public Concern: The Forest Service should accurately label unroaded and roadless areas.**

**SO THAT OPPOSING INTERESTS CAN UNDERSTAND THE ACTUAL SITUATION ON THE GROUND**

My biggest other concern is the fact that the inventoried roadless areas are an absolute fraud being pulled over on the unsuspecting public and political representatives; this is because these areas can and often do have roads within them. And further many historical roads, truck roads, and abandoned railroad beds, particularly in the eastern Weeks Act Forests, are not even considered ‘roads’ under the inventoried roadless definition. Because of this, many well intentioned citizens and elected officials believe that by supporting the “roadless initiative” they are supporting the protection of pristine areas untouched by humans; that is false. The reality is far different and varies from National Forest to National Forest. The effect of the “roadless initiative” in many cases is an anti-history campaign based on the misinterpretation of the roadless inventory. This is a lexicological disaster that could be partly remedied by relabeling the “roadless”, “unroaded”, and other forest transportation based categories with accurate terms more in keeping with common usage. The result of accurate labels would be a discussion in which those on different sides of the issue at least understand the actual situation on the ground. (Individual, Center Sandwich, NH - #A5698.45000)

**482. Public Concern: The Forest Service should not define areas covered by special use permits or mineral leases as roadless or unroaded lands.**

We suggest that areas covered by special use permits or mineral leases be defined [not as] roadless or unroaded lands. Among these areas are those covered by grazing permits, water diversion facilities and ditches and canals, telecommunication sites, mining claims, road and water easements, and recreation developments. (Elected Official, Douglas County, OR - #A11811.45000)

We suggest that areas covered by special use permits or mineral leases be defined as not roadless or unroaded lands. Among these areas are those covered by grazing permits, water diversion facilities and ditches and canals, telecommunication sites, mining claims, road and water easements, and recreational developments. (County Attorney, Grant County, OR - #A17667.90100)

**483. Public Concern: The Forest Service should refer to areas with roads or motorized trails as unroaded, not roadless.**

The regulations should not use the word roadless (except in reference to Inventoried Roadless Areas). The connotation of the generic term “roadless” has been a great source of confusion to the general public

throughout the prior rulemaking. An area should not be referenced in any agency documentation in the general sense of roadless or roadlessness. Areas without the presence of roads or motorized trails should be referred to as “unroaded”, not roadless. Unroaded should be defined as any area which does not contain any roads (whether such roads are categorized as classified, unclassified, or uninventoried) or motorized trails. (Organization, Chesapeake, VA - #A11804.45200)

**484. Public Concern: The Forest Service should not use the term roadless to describe areas containing forest products necessary for the future operation of the timber industry and community recreational roads and trails**

It is our understanding that the Clinton-directed review process will establish criteria and procedures that may negatively impact public access to forestlands. Consider discontinuing use of the term “Roadless” to describe areas that contain forest products necessary for the future operation of our industry as well as our community’s recreational roads and trails. (Association, East Lansing, MI - #A23868.45000)

**485. Public Concern: The Forest Service should not use the term non-road.**

I value having access to our national forest land. I know that there are many possible uses for the land and that there is obviously conflicting opinion about what should or should not be done.

I think the whole term “non-road” is ridiculous. (Individual, Cincinnati, OH - #A4027.45200)

**486. Public Concern: The Forest Service should clearly differentiate between a road and a trail.**

... as off-road vehicles continue to grow in size, the Forest Service continues to increase the width of what they consider to be a trail versus a road. The definition of “road” must clearly differentiate a road from a motorized route or non-motorized trail “on-the-ground,” and not depend on the language “unless classified and managed as a trail.” In other words, anyone should be able to look at a route and know if it is a road, a motorized route or a non-motorized trail. The old definition of a road was: “a general term denoting a way for purposes of travel by vehicles greater than 50 inches in width.” This definition comes from FSH 7709.54 and does not refer to trails, which are defined separately. It is intended for identifying roads on the ground.

The new definition is: “a motor vehicle travelway over 50 inches wide, unless classified and managed as a trail. A road may be classified or unclassified.” The key difference here is that in the new definition, the Forest Service has changed from a travelway for VEHICLES greater than 50 inches, to a TRAVELWAY greater than 50 inches.

The old definition was tied to the fact that most ORVs were 50 inches or less in size, even though ORV routes are usually greater than 50 inches in order to accommodate the vehicles. The new definition simply says that the travelway has to be more than 50 inches wide.

We ask that the following be included as part of the Roadless Area Conservation Rule:

A) we propose dropping the classified/unclassified road distinction and simply defining a “road” as:

“a general term denoting a travelway that is legally and intentionally constructed and regularly maintained by mechanical means, for purposes of regular and continuous travel by standard passenger vehicles.”

B) Unclassified roads would no longer be termed roads, but instead termed “unauthorized motorized routes.” (Organization, Missoula, MT - #A21359.45200)

## Environmental Values

This section includes 11 subsections: Environmental Values General, Evaluation of Roadless Areas, Management, Water Quality, Air Quality, Soils, Scenery, Wildlife, Wildlife Habitat, Threatened and Endangered Species, and Vegetation and Botanical Resources.

### Environmental Values General

#### Summary

**General Comments** – A number of respondents comment on environmental values. The most general comment on this topic is that the Forest Service should preserve the environment. Suggested reasons for this include the need to protect global ecosystems, to help stop deforestation, and to preserve unique climates. Respondents suggest that preserving the environment can be done by monitoring traffic, encouraging the establishment of conservation associations, and encouraging the signing of the Kyoto Treaty. Others suggest that the Forest Service should hold the Administration accountable for maintaining environmental safeguards. Some state that the Forest Service should revise forest plans to address environmental concerns. Others advise the Agency to avoid relying on planned mitigation to offset environmental effects. Conversely, some say that pre-settlement conditions are not attainable and should not be held as a goal.

**Roadless Area Environmental Values** – Respondents offer a number of comments requesting the protection of roadless areas for environmental reasons. These writers assert that the Forest Service should consider ecological values when evaluating roadless areas. According to respondents, roadless areas should be protected to preserve ecological values, to increase representative ecosystem types, to preserve biodiversity, to restore surrounding areas, and to set an example for other countries. In order to protect these roadless area values, some people recommend that the Forest Service implement the Roadless Area Conservation Rule, while others comment that the protection of roadless areas should not result in increased damage to roaded areas.

**Adequacy of Analysis** – Some respondents comment about the adequacy of the analysis of environmental values. These people advise the Forest Service to make decisions based on science in order to allow ecosystem management to be the prime objective and to ensure sustainability. Some suggest that the Forest Service should adequately evaluate environmental impacts, particularly the environmental impacts of modern problems such as acid rain and global warming. Similarly, some ask that the Forest Service take into consideration the effects that environmental destruction will have on a global level. Others believe the Forest Service to protect roadless areas in order to enable the study of the long-term effects of timber removal; and others add that there is a need to “identify native biological communities that are poorly represented in current roadless areas and restore roadless areas that could support these rare communities.” On the other hand, some assert that the concept of biodiversity is a fraud. According to one individual, biodiversity does not acknowledge evolution and seems to replace it with an unchanging environment. This person claims that recent studies have proven that a healthy environment is reflected in fewer species.

**Funding** – In comment on roadless area environmental values, some focus specifically on the matter of funding for the desired actions or resulting impacts. Some respondents assert that the Forest Service should use money allocated for roads to fund ecosystem management and protection of wildlife, or they request funding for the study of ecology. Respondents also ask that the Forest Service identify funding necessary to relocate, reconstruct, or maintain the existing routes to ensure compliance with existing environmental requirements. Others mention funding for the prevention or restoration of environmental damage. One individual suggests that the Forest Service require those who ask that road construction be allowed to bear the costs of damage to affected ecosystems while others request funding for reclamation projects, including research on the effects of habitat degradation.

**Education** – Several respondents suggest that the Forest Service educate the public. Suggested topics of education include the environment and ecology, the costs of environmental degradation, conservation goals, and the need to make productive use of forests.

**487. Public Concern: The Forest Service should hold the Administration accountable for maintaining environmental safeguards.**

President Bush's administration needs to remain representative and respond to the environmental concerns of his constituency and the legacy of future Americans. Supporting technologies and industries that undermine our country's legacy rather than training workers in those fields, for new environmentally sound industries, is the height of hubris. I call on you to hold the administration accountable for its efforts to weaken the environmental safeguards and public participation opportunities in the forest planning regulations. (Individual, Northridge, CA - #A21249.12111)

**BY DEMANDING AN EXPLANATION OF HOW IT INTENDS TO FURTHER PROTECT NATURAL RESOURCES**

I demand a response detailing what the Bush Administration intends to do about further protecting our national resources like the Tongass National Forest. (Individual, Ithaca, NY - #A16541.12111)

**488. Public Concern: The Forest Service should adequately identify forest environmental values.**

The environmental values of the forest should be identified. For example, many forests have the potential for the overgrowth of trees. As the ranger at Hone Quarry indicated, some areas of forest can become too dense or matured. In such cases, they allow for the timber extraction of these trees. The ranger added that when the national forest permits local timber companies to come in and remove these trees, they usually only need minimal roads to do the task.

Other environmental values to consider are the species in the forest. Again, the ranger commented that even within a small cubic region, a huge number of species of organisms and plants probably exist. Obviously, if these areas are not designated as roadless, construction in these areas will endanger the survival of these species. In George Washington National Forest, black bear and wild turkey populations in the area are in direct competition with increasing public use and development. Hence, in order to protect all the living entities in a forest, most areas should remain roadless. (Individual, No Address - #A30370.50000)

**489. Public Concern: The Forest Service should recognize that preservation values have already been adequately addressed.**

Rather than preserving a long, extensive list, I will refer the reader once again to the Roadless Area conservation FEIS (on which the current Rule is based), Chapter 3, which covers topics ranging from physical resources to American Indian issues. It should be clear that the issues covered in Chapter 3 are exhaustive and in no need of enhancement. Of prime importance to me are the values of watershed protection, wildlife habitat, and low-impact recreation. It is important to note that all of the stated concerns behind the current efforts to amend the Rule (forest health, fire management, access issues,

local input, etc.) have already been painstakingly and adequately addressed and resolved by the Rule itself. This is clear to anyone who has taken the time, as I have, to actually review the final document. The Rule has provisions for fuels-reduction thinning and habitat improvements for endangered species among other concerns. This fact compels me to, once again, suggest that the original Rule be implemented as written and published. (Individual, Sedona, AZ - #A17217.50000)

These factors were considered thoroughly in the Environmental Impact Statement. First and foremost should be consideration of the ecological values that these areas will provide, including value as intact habitat for plants and wildlife, as a corridor between key habitats, and as fully functional, healthy ecosystems. (Individual, Olympia, WA - #A20847.50100)

#### **490. Public Concern: The Forest Service should preserve the environment.**

##### **TO PROTECT GLOBAL ECOSYSTEMS**

Protecting forests implies the protection of biodiversity, the atmosphere, soils, the Earth and its inhabitants. A forest is not something separate from the whole. It should not be viewed that way. Instead it is part of an entire planetary system, which can cause significant alterations to the Earth's atmospheric dynamics. We have reached a fulcrum, it is time we protected all remaining forests. This means no mechanical intrusions and no intentional burning other than those created by lightning strikes. Existing forest covers should be extended through the encouragement of natural extension systems. (Individual, Curtain Act, Australia - #A29708.50100)

##### **TO HELP STOP DEFORESTATION**

There is widespread publicity about worldwide deforestation, and public uproar about it. Can't we protect our own forests? It is so much easier to say that other people cause the problems. In reality, we must all act responsibly. (Individual, Spokane, WA - #A26820.50420)

##### **TO PROTECT ECOLOGICAL SYSTEMS**

In the case of forests, tampering any further with already too-diminished wild forest acreage will endanger the ecological services these forests provide—air and water purification, spawning fish and game, maintaining a reservoir of biological richness and diversity (both as a good in itself and as the seed stock for rehabilitating and restoring forest land degraded by past logging, mining, etc.). (Individual, Pasadena, CA - #A11735.30100)

##### **TO PRESERVE UNIQUE CLIMATES/ECOSYSTEMS**

The United States of America is home to many ecosystems/climates that are present NO OTHER PLACE ON EARTH but in our country. These ecosystems will not be able to sustain themselves without the presence of established trees and the niches they fulfill! For example, Washington and Oregon contain the ONLY mild climate, temperate rainforest on the planet. Without the native Redwood trees, which sustain that ecosystem, those two states wouldn't have the same climate, wildlife or beauty. Removing these Redwoods would also lead to soil erosion and exhaustion. THESE FACTS ARE SCIENTIFICALLY PROVEN!!! So why then would the President, who has been elected to make decisions that better our country, want to deplete the land and ecosystems contained within its borders? (Individual, Harper Woods, MI - #A40537.50510)

##### **BY TAKING A LONG-TERM VIEW**

The principal responsibility of the forest service is to be guardians of the lands they manage. Emphasis must be put on the soils, the waters, the wildlife, and the vegetation in any management plan. The Forest service must always see the big picture as their primary responsibility and think of the consequences of any actions in a 25, 50, or 100 year time frame. National Forest lands belong to all the citizens of the United States, most of whom cherish these lands. Although any individual has the right to express his opinion, this opinion should not be allowed to outweigh the importance of protecting the land. (Individual, Reno, NV - #A23545.50100)

**BY PROTECTING LOW-ELEVATION ECOSYSTEMS**

In the Southern Rockies and throughout the nation, many ecosystems are not adequately represented in our current system of protected areas, such as national parks, wilderness areas, and research natural areas (Scott et al. 2001). For instance, here in the Southern Rockies, SREP discovered that roughly 70% of the region's protected areas lies above 10,000 feet, thus capturing mainly high-elevation ecosystems, such as subalpine forests and alpine tundra, as well as hundreds of thousands of acres of bare rock and snowfields. As a result, numerous natural communities are either poorly represented or missing entirely in the current system of protected areas. This finding is mirrored by the Forest Service's analysis of the plant ecosystems represented within designated wilderness in Region 2: over 90% of these lands are found within three ecosystem types—rock and ice, alpine tundra, and high-elevation Engelmann Spruce-subalpine fir. (See Appendix 3: Plant Series—Rocky Mountain Region: Wilderness and Management Areas). In contrast, 60% of the roadless land area in the Southern Rockies lies below 10,000 feet in elevation and contain significant amounts of low- and mid-elevation ecosystems that are not well represented in the current system of protected areas. (Organization, Denver, CO - #A21367.60400)

**BY MONITORING TRAFFIC**

After the roads are built, will the government have the ability to adequately monitor the "health" of the local environment to ensure that the traffic on the roads is not proving to be too detrimental to the local flora, fauna, watershed, etc.? If the government finds that unexpected damage is occurring, will the government have the ability to close the roads and allow the area to become 'roadless' once again? (Individual, Columbus, OH - #A659.50000)

**BY REWARDING FOREST SERVICE PERSONNEL FOR MAINTAINING AND IMPROVING HEALTHY ECOSYSTEMS**

Reward USFS managers and staffers for maintaining and improving indicators of healthy ecosystems and overall biodiversity levels. (Individual, Dallas, TX - #A18002.30200)

**BY ENCOURAGING THE ESTABLISHMENT OF CONSERVATION ASSOCIATIONS TO HELP PROTECT ECOLOGICAL FOREST VALUES**

I expect that if the Forest Service were to preserve some fraction of their lands in a pristine state, it would find that non-profit organizations similar to the National Parks Conservation Association (NPCA) could be set up to support this effort. Why not a National Forest Roadless-Area Conservation Association to help tap into private resources for protection of the ecological values of the forests? (Individual, State College, PA - #A28680.15121)

**BY ENCOURAGING THE SIGNING OF THE KYOTO TREATY**

Personally I'd like to comment that the world belongs to us ALL. Logging of forests has been done all over the world for many centuries. The devastating effects are also C L E A R. Have a look at Ireland: there used to be lots of forests, but now less than 10% of the country is forest. If you plan to let the world go down, we cannot accept that. Your plans are like plans made in the 60s, where environment didn't matter as much as it does nowadays. Maybe I'm not making it clear, but I'm pretty much angry to see how (at distance, I'm from the Netherlands) things are being . . . up at the other end of the ocean!!!! Instead of reducing energy consumption, you just want to mine for more (fossil) energy! As reason you're telling that it's good for the American economy. Let me tell you this: if you keep on executing actions and plans like this, there will be no future. There will be no American Economy anymore. There will be no more, a world in which people, plants and animals can live because of all the polluting and molestation actions. I highly suggest you take a 2nd look at your conservation rule, and have a 2nd opinion in other (European) countries. And last but not least: SIGN THE KYOTO COMMITMENT!!!!!!!!!! (Individual, No Address - #A3752.50400)

**491. Public Concern: The Forest Service should revise forest plans to address environmental concerns.****THE NORTHWEST FOREST PLAN**

The Northwest Forest Plan must be revised. The old growth cannot be saved. LSR is not favorable to water production. Snag retention must be eliminated. Heavy fuel retention must be eliminated. The

recreation of wetlands must be monitored so that something is not created that will do more harm than good. Fire will not eliminate the medium to heavy ladder fuels. (Individual, Klamath Falls, OR - #A8809.20000)

**492. Public Concern: The Forest Service should avoid relying on planned mitigation to offset environmental effects.**

The project should not be mitigated in order to continue. We should not rely on planned mitigation. This is simply attempting to fix things after a planned resource failure. In so many cases these so-called projects are referred to as timber, road, mining or grazing “opportunities”. The strategy of messing up the ecology for someone’s (usually a local citizen) monetary gain, and then attempting to fix the mess makes no sense at all. (Individual, Grangeville, ID - #A830.50000)

**493. Public Concern: The Forest Service should consider that the Roadless Area Conservation Rule will promote the use of less environmentally friendly products.**

Contrary to the implied conclusions of the analysis, the preferred alternative(s) will . . . promote the use of less environmentally friendly products . . . (Professional Society, Anchorage, AK - #A21707.20201)

**494. Public Concern: The Forest Service should recognize that pre-settlement conditions are not attainable.**

It seems to me that the organizations or special interest groups that are backing the implementation of this rule assume that if there are no roads to provide access into those designated areas, then they will return to their pre-settle conditions. Nothing could be further from the truth! We will never again have pre-settle conditions in this country. #1 because of past land use (over farming, strip mining, high grading, etc.) #2 because of fire suppression, you cannot have pre-settlement conditions by altering natural occurrences. #3 because of the introduction of exotic diseases and pests into both our terrestrial and aquatic ecosystems (pest which our native species cannot handle), and #4 because of overpopulation, which everyone knows causes a whole host of problems in itself. (Individual, Ellenboro, NC - #A10509.15121)

**495. Public Concern: The Forest Service should recognize that the Wyoming Wilderness Act does not adequately protect the environment and wildlife habitat.**

The Wyoming Wilderness Act protected high altitude habitat and did not garner protection for complete ecosystems and watersheds, or the lower mountain regions that would protect large herds of wintering and migrating elk, deer, and moose. The Bridger-Teton and Shoshone National Forests should protect the wild integrity of the remaining roadless areas in the impending Forest Plan Revision process. (Individual, Jelm, WY - #A27247.20000)

*Environmental Values General – Roadless Areas*

**496. Public Concern: The Forest Service should protect roadless areas.**

**TO PRESERVE THEIR ECOLOGICAL VALUES**

These Areas are roadless because they were not appropriate areas for logging, mining, or grazing, the uneconomical places. The extractors have not gotten there yet, and as a result these areas have become the last vestiges of the pre-settlement American forests. These forests now have far more value than their extractive, consumptive values - values such as biodiversity, watershed protection, ecosystem services such as cleaning up water and air, generating oxygen, making soil, and recreation (including hunting and fishing). (Individual, Cedar Mountain, NC - #A45.50000)

Give no value whatsoever to commercial or economic considerations, only ecological and preservation values should matter. (Individual, No Address - #A25.50000)

The values that the Forest Service should consider as it evaluates and plans for roadless areas are the interests and circumstances of the nation as a whole and the potential for these areas to contribute to the national well being. In this regard three facts seem especially relevant: 1.) The United States has the largest and most useful road system on the face of the earth that has ever existed in human history. 2.) The United States has obliterated 97 percent of its primary forest. 3.) Inventoried roadless areas of National Forests have unusually high potential to exhibit natural characteristics. Since our needs for moving stuff around have been extensively met and our needs for ecological well being have been grievously compromised it is obvious that environmental health should be the overwhelming concern with regard to these lands. (Individual, West Lebanon, NH - #A4836.45100)

Present and future ecological value should be considered when examining roadless areas. Is it pristine? Was it once pristine and could be again, if roadbuilding and logging were ceased? Is the forest otherwise heavily fragmented? How is the water quality? Has erosion from other roads affected water quality elsewhere? Could it happen here? What are noise considerations? Is the area near a wilderness? Can it provide an important buffer to the wilderness and visitors to the wilderness? Is the area important wildlife habitat, especially for rare, threatened or endangered species? Is the area valuable for scientific research? Is the area important to Native American history, culture or religion? How is the view? Is it part of a stunning vista that would be destroyed if it were logged? (Individual, Minneapolis, MN - #A30387.45000)

In evaluating inventoried roadless areas, the Forest Service should consider the nature of the ecosystem in each roadless area. This includes the identification of habitat for threatened and endangered species, the existence of invasive exotics, and other characteristics. Recreational values of the roadless areas and the economic value of recreational activities in those areas should also be considered. The economic value of the timber should be a minor consideration, although timber harvesting to remove invasive species, improve habitat for threatened or endangered species, or to reduce fuel loads should continue to be available as a management tool in the inventoried roadless areas. (Individual, Marietta, GA - #A4827.45000)

#### **TO INCREASE REPRESENTATIVE ECOSYSTEM TYPES**

Roadless areas will increase representation of ecosystem types in protected areas. In the Southern Rockies and throughout the nation, many ecosystems are not adequately represented in our current system of protected areas, which includes public lands such as National Parks, Wilderness Areas, and Research Natural Areas (Scott et al. 2001). For instance, here in the Southern Rockies SREP discovered that roughly 70% of the region's protected area lies above 10,000 feet in elevation, thus capturing mainly high-elevation ecosystems, such as subalpine forests and alpine tundra, as well as hundreds of thousands of acres of bare rock and snowfields. As a result, numerous natural communities are either poorly represented or missing entirely in the current system of protected areas. In contrast, more than 60% of the roadless lands that are in the Southern Rockies lie below 10,000 feet and contains significant amounts of low- and mid- elevation ecosystems that are now well represented in the current system of protected areas. If these roadless areas were protected in the Southern Rockies, 10 of 12 major terrestrial ecosystems (e.g., ponderosa pine forest, mountain shrublands) would have at least 10% of their total area within protected areas. De Velice and Martin (2001) determined that, of the land-cover classes they examined for the U.S. as a whole (a coarser classification than what Shinneman et al. used), all of the western U.S. land cover types would achieve at least 12% representation if roadless areas were protected.

Better representation of all ecosystem types in protected areas means better protection for the myriad species they support. Higher numbers of species are associated with the low- and mid- elevation ecosystems found in roadless areas when compared to high-elevation ecosystem types. For instance, in the Southern Rockies, alpine tundra has roughly 50 associated vertebrate species while lower elevation sagebrush and semi-desert shrublands have around 160 associated vertebrate species. Thus, protecting

roadless areas will also protect more species-rich ecosystems. This could potentially prevent many plant and animal species from becoming imperiled and eventually listed as Threatened and Endangered under the U.S. Endangered Species Act. (Organization, Boulder, CO - #A22130.50510)

### TO PRESERVE BIODIVERSITY

I love our National Forests. I hike in the nearest ones regularly, and look forward to visiting others whenever I can. My favorite activities are hiking, birding, and photography. The roadless areas are very important to me, whether I am able to access them or not. Even if they are too remote for access by day hikes, they play a very important role in conservation of species. As you know, the smaller a piece of land is that is undisturbed, the poorer it gets in species diversity. So for that reason alone, we should keep as much of the forests roadless as we possibly can. (Individual, Reno, NV - #A82.50000)

The most important value to consider in evaluating roadless areas is the fact that these few remnants of our nation's great forests are invaluable as islands of biodiversity from which species might hope to re-colonize the surrounding areas that have been logged or otherwise degraded. Additionally, these areas are of inestimable value as legacy for future generations. These two things alone would justify the need to protect them from further development and environmental degradation and far outweigh any short-term economic benefits that might be derived from their development. These remaining roadless areas represent such a minute fragment of what were once our great National Forests that this must be the overriding consideration in managing these areas. (Individual, Tenakee Springs, AK - #A5083.50000)

Conserving wild forests affords the protection of those areas needed to preserve species and ecosystems that is America's heritage. Extensive scientific literature (Noss and Soule, 1998) has recognized the need to protect large areas of "core reserves"—absolutely protected areas to facilitate the survival and recovery of wide ranging species. By protecting forests, society maintains the biological legacy that supports a diversity of life, including humans, and provides goods and services necessary to sustain a viable economic future. (Organization, Minneapolis, MN - #A28927.50520)

The principal value offered by National Forest roadless areas is as a reservoir of undeveloped land and biodiversity. This is the key value to which others—whether timber extraction or recreation (for example)—are second. With respect to timber extraction, this is simply because roaded public and private lands can grow trees just as well or better than most roadless areas, while providing cheaper access due to existing roads. With respect to recreation, this is likewise because such roaded lands already offer many developed-recreation opportunities. The ecological and hence societal benefits of large tracts of undeveloped land have been amply and scientifically documented; only roadless areas by definition (whether designated Wilderness Areas, Wilderness Study Areas, inventoried roadless areas, etc.) can then provide these benefits to our nation. (Individual, Granite Bay, CA - #A5166.50100)

I would like to make some outlines of recommendations for a heightened awareness, as you proceed with the rule making process decision and choosing the most appropriate alternative with accompanying consequent intentional actions:

Process of examining for roadless areas -->assist in Plan Revision--> RARE III.

Assume that areas now not inventoried roadless areas are not properly classified i.e. reexamine the totality of the system for roadless potential with the new criteria hereupon derived.

An increased weight for a *top priority* for the Value of Biodiversity (VOB) in and of itself.

Priority of *Ecological values* (i.e., including potential for old growth characteristics).

As Humans, the only *really* provable produced biodiversity in terms of *perpetuity* is seen from the perspective of geological-evolutionary spatial-temporal lenses.

Economic value as a consideration only as viewed through a *curtain* of the Value of Biodiversity, i.e., the increase of species as created by clear cutting most probably does not contribute, or is comparable to *evolutionary produced biodiversity and therefore has not provable economic value, for the long term.* (Individual, Ewen, MI - #A17662.45100)

The value of the area in question should be considered in terms of its ability to contribute to or to sustain the biodiversity of the larger area within which the roadless area exists. For example, if the roadless area has been or can be shown to provide the range, protection and habitat needed for sustaining a healthy population of grizzly bears or for that matter, any essential or endangered or even at risk, flora or fauna, large or small, that is either listed as threatened or endangered or even at risk, then by all means, protect that value. Once these types of inherent forest values have been identified and noted, the remaining values are the protection of our own cultural and spiritual values. A place for a native American to obtain the natural objects that are part of their ceremonies and heritage; a place for us to show and teach people about the natural resource values within a roaded area and their importance in maintaining a healthy ecosystem, untrammled, except by foot or hoof or paddle. (Individual, Olympia, WA - #A28646.45100)

#### **TO PRESERVE THE FOOD CHAIN**

I am scared to death of losing any more forests, because our trees are living organisms placed on this earth for many purposes. Their natural beauty, which brings peace to those of us who walk among them, is the least of the reasons for their existence. As you know, forests are a major part of the ecosystem which provide food and shelter for other plants and the animals in our food chain. When we disrupt the food chain, WE suffer the consequences along with the living organisms we've allowed to die. (Individual, Gainesville, FL - #A222.50000)

#### **TO USE AS MODELS OF ECOSYSTEM MANAGEMENT**

I fully sympathize with the difficulty of the mandate of multiple use. However, I urge that decisions regarding the future management of roadless areas consider primarily **the long-term ramifications to habitat and wildlife**. The 58 million acres in question are a small portion of federally managed lands. I urge the Forest Service to use them as models of ecosystem-friendly management. These are not vague or unrealistic goals. If systematic and scientific investigation demonstrates a road or cut is eroding into a stream, close or improve the road and stop the cut. If a road or cut is fragmenting habitat, take measures to resolve the problem or cease the activity. (Individual, Baton Rouge, LA - #A21876.50100)

#### **TO RESTORE SURROUNDING AREAS**

The Roadless Area Conservation Rule emphasizes ecological sustainability as the first priority for management plans. These ecologically intact areas can serve as nuclei for restoration of ecological functions in the surrounding forest areas. (Organization, Mariposa, CA - #A28552.50100)

#### **TO SET AN EXAMPLE FOR OTHER COUNTRIES**

As a citizen of the U.S.A. trying to stem the tide of tropical forest destruction, I cannot often say that developing countries should follow our example, given that we deforested most of eastern North America and have done a pretty bad job in the west as well. But at least I could use the designation of roadless areas as evidence of our commitment to protecting the environment. If these areas are once again opened up, we will all lose substantial credibility in the battle against deforestation worldwide. As the richest nation in the world, can't we curb some of our greed and leave what is left in wilderness? (Professional Society, Gainesville, FL - #A26736.50400)

### **497. Public Concern: The Forest Service should ensure that protection of roadless areas does not result in increased damage to roaded areas.**

#### **PROTECT ROADED AREAS THROUGH THE NATIONAL FOREST MANAGEMENT ACT**

Protecting these areas should not allow free-license to decimate the remaining roaded areas. The NFMA must protect the remaining resources in a suitable, ecosystem-oriented manner. (Individual, Kemmerer, WY - #A8383.50100)

### **498. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule.**

The best way for roadless areas to be managed for healthy forests is to allow the Roadless Conservation Policy to stand as implemented on January 12, 2001. The Roadless Area Conservation FEIS states on p.

3-5, “Unroaded areas are more likely than roaded areas to support greater ecosystem health, including the diversity of native and desired nonnative plant and animal communities, due to the absence of disturbances caused by roads and accompanying activities. Inventoried roadless areas also conserve native biodiversity, by providing areas where nonnative invasive species are rare, uncommon, or absent.” Also on p. 3-5, “Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land—inventoried roadless areas function as biological strongholds and refuges for many species.” This is particularly true in the Yaak Valley where roadless areas such as Roderick IRA provide some of the highest concentrations of grizzly bears in the Yaak ecosystem. (Individual, Post Falls, ID - #A29936.50500)

#### **BECAUSE WATERSHEDS AND WILD HABITAT EXTEND BEYOND LOCAL ADMINISTRATIVE BOUNDARIES**

Watersheds and wild habitat extend beyond local administrative boundaries. So their maintenance should be guided by larger policy. The National Forest Management Act undervalues wild habitat and watersheds (because they have been steadily cut and consumed over the last 40 years under its process). Local planners should focus the Conservation Rule, not override it. (Individual, Langley, WA - #A17924.13110)

### *Adequacy of Analysis*

#### **499. Public Concern: The Forest Service should make decisions based on science.**

When law-makers and law-shapers begin to use our best available science and technology as their guide, environmental policy and law will inevitably begin to parallel natural law. Again, natural law truly governs the long-term physical well-being of the human race. (Individual, Metropolis, IL - #A3877.50300)

Use science, not politics to make sound decisions. (Individual, Lexington, KY - #A6036.50000)

#### **IN ORDER TO ALLOW ECOSYSTEM MANAGEMENT TO BE THE PRIME OBJECTIVE**

Best available science and wide-ranging public input should be the basis for decisionmaking. Special interest, single-issue groups certainly have a right to be heard but in the end sustainability and ecosystem health should be the prime management objectives. (Individual, Las Vegas, NV - #A28178.14000)

Protecting the forest: The idea of protecting the forest by cutting it down is a way for the timber industry to sound reasonable while getting more land to clearcut. Sound scientific data and methods should be used when protecting against wildfire and disease. Decisions should be made by scientists with the forests’ ecosystems’ best interests in mind. Not by the resource extraction industries or politicians. (Individual, Snohomish, WA - #A30084.15100)

#### **TO ENSURE SUSTAINABILITY**

There is much more to be discovered in the future. The role of local forest management is important, as it always has been, insofar as it is consistent with the recent rulings, emphasizing sustainability, collaboration, and science. These are national lands that we all have an interest in, now and into the future. In order to guarantee sustainability, good science must be used. We know much more now than we did even twenty years ago about forest ecology and how ecological systems work. (Individual, Salt Lake City, UT - #A19069.14500)

#### **500. Public Concern: The Forest Service should adequately evaluate environmental impacts.**

#### **TO AVOID ARBITRARY AND CAPRICIOUS DECISIONMAKING**

The cumulative effect of not considering all relevant factors such as the studies and finding discussed above will lead to a clear error in judgment. According to case law, an agency’s decision would be

arbitrary and capricious “if the agency relied on factors which congress had not intended it to consider, entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency or is so implausible that it could not be ascribed to a difference in view of the product of agency expertise.” (Motor Vehicle Mfrs. v. State Farm Mutual Auto. Ins. Co., 463 U.S. 29, 43 (1983)).

Therefore, an agency’s decision can be found arbitrary and capricious if one or more of the following characterizations are met: (1) the decision ignores material factors, (2) the decision places great weight on irrelevant factors, (3) the decision is contrary to the agency’s explanation for the choice, and (4) the decision is so outrageous that it was a “product of agency expertise.” We encourage the Forest Service to avoid this characterization and adopt a Rulemaking alternative built around a fair evaluation of environmental impacts including mitigation measures and all reasonable and existing motorized roads and trails. (Organization, Helena, MT - #A13226.10141)

### **501. Public Concern: The Forest Service should address the environmental impacts of modern problems on forests.**

#### **ACID RAIN AND GLOBAL WARMING**

Your questions fail to address critical modern day problems, such as the environmental impact of acid rain on our forests. In Understanding Forests, John A. Berger maintains: “Forest damage from acid rain costs the world tens of billions of dollars a year. . .” (16-17). Similarly, you refuse to pose any questions about the environmental impact on our forests and oceans brought about by global warming, a phenomenon recently affirmed by scientists around the globe. (Individual, Melvindale, MI - #A30286.50400)

### **502. Public Concern: The Forest Service should recognize the global ramifications of environmental destruction.**

Can’t the people in charge of our country see the damage already done and still worse, being done more quickly than before? Have you seen any scientific predictions of what the pollution and destruction we are doing to this earth is going to produce? It is happening already: The weather—the disasters and droughts; hurricanes, global warming, more tornados, more severe heat waves in record breaking lengths of YEARS and the unusual natural disasters like never EVER before. And all this is killing people and making record numbers of entire nations of people suffer so horribly. All of these things, even just in the last decade, have increased in intensity at an alarming rate. We are destroying our own planet! What about our grandchildren’s futures, or their children’s futures, if any at all? Who should try to stop this insane course we have been on (and continue to increase) in our blindness and denial. We must ALL take responsibility now, today, THIS MINUTE, to stop what more destruction of this earth will do to it, do it forever. We must each and every one of us, stop the money-importance only attitudes and look around. How blind and how stupid we as humans and inhabitants of this planet have been. When will we finally STOP all this? After its completely too late, and we all are dying off due to destruction of our own world? If there are other planets with intelligent life, how must they think of us, as destructive, so ignorantly intent on killing ourselves? (Individual, Ogden, UT - #A27782.50400)

### **503. Public Concern: The Forest Service should protect roadless areas.**

#### **TO ENABLE THE STUDY OF THE LONG-TERM EFFECTS OF TIMBER REMOVAL**

Since more than 90% of the original, virgin forests that once covered the continental US have been cut at least once, I think it unwise to allow additional virgin, roadless forest to be prepared for cutting by allowing roads to be constructed. If anything we need the few remaining large tracts of virgin, roadless forest to be left alone to serve as benchmarks for further scientific study to determine just what long-term effects modern, mechanized timber harvest has had on our forests that have already been cut. (Professional Society, Hixson, TN - #A26223.52200)

**504. Public Concern: The Forest Service should compare the negative impacts of decreased access against the environmental benefits.**

The environmental document must objectively compare the significant negative impacts of closing roads and motorized trails to motorized visitors versus the positive benefits to wildlife habitat, sediment production, water quality, noxious weeds, and fisheries. The real measurable benefits to wildlife habitat, sediment production, water quality, noxious weeds and fisheries from the closing of these travel ways to motorized visitors are all too often relatively small in magnitude and do not justify the significant cumulative impact of the motorized closure on thousands of visitors seeking motorized access and recreation. The document must evaluate how the goal of environmental perfectionism is affecting the human environment. The document must also evaluate the cumulative impact that using environmental perfectionism as a goal for decision-making is having on the human environment. (Organization, Great Falls, MT - #A15315.50000)

**505. Public Concern: The Forest Service should identify underrepresented biological communities.**

The FS needs to identify native biological communities that are poorly represented in current roadless areas and restore roadless areas that could support these rare communities. (Professional Society, Missoula, MT - #A17054.45000)

**506. Public Concern: The Forest Service should evaluate the status of non-National Forest System lands in the coastal rainforests of southeast Alaska and British Columbia.**

**TO DETERMINE WHETHER ADDITIONAL CONSERVATION EFFORTS ON THE TONGASS ARE NEEDED TO PROVIDE A BUFFER FOR REGION-WIDE CUMULATIVE EFFECTS**

The Forest Service should evaluate the status of non-Forest lands in the coastal rainforests of Southeast Alaska and British Columbia, to determine whether additional conservation efforts on the Tongass are warranted, to provide a buffer for region-wide cumulative effects. Private, state, and borough-held lands in Alaska are all subjects to intense logging, with few exceptions. A similar situation appears to exist in British Columbia, where comparatively few lands have been reserved for conservation purposes. It seems unlikely that non-Forest System lands in the region will adequately protect the ecological values of the temperate rainforest. (Permit Holder, Juneau, AK - #A23220.45613)

**507. Public Concern: The Forest Service should provide an analysis of geologic hazard mitigation opportunities that will be lost as a result of roadless area designations.**

**IN WYOMING**

We believe it is important that the following issues must be addressed in the underlying EIS, on a Wyoming-specific scale.

A detailed analysis of geologic hazard mitigation opportunities that will be lost as a result of this proposed action. (State Agency, Cheyenne, WY - #A22609.10135)

**508. Public Concern: The Forest Service should recognize that the concept of biodiversity is a fraud.**

The concept of Biodiversity is a fraud! It ignores Evolution and replaces it with a "static" unchanging environment. As every scientific person worth his "salt" knows, the Earth is dynamic and ever changing. Over 99% of all species that have existed on the face of the Earth are now extinct, and they became extinct before man ever existed! Recent university studies have shown that a healthy environment is reflected in fewer species. (Individual, Sedona, AZ - #A1566.20222)

## Funding

### **509. Public Concern: The Forest Service should use money allocated for roads to fund ecosystem management and protection of wildlife**

Forest Service studies and congressional hearings have established that the Forest Service loses hundreds of millions of dollars every year on its road system. Opening up the roadless areas for additional road building and logging will increase the deficit in the Forest Service budget. From a strictly economic standpoint, the government would be better served to leave these roadless areas intact and use the road money on other Forest Service programs, such as ecosystem management and protection of wildlife. (Individual, Seattle, WA - #A4885.17100)

### **510. Public Concern: The Forest Service should fund the study of landscape ecology, conservation biology, and fire ecology.**

#### **IN AND NEXT TO ROADLESS AREAS**

I want full funding of the evolving study of landscape ecology and conservation biology and fire ecology in and next to the roadless wilderness areas. (Individual, Talent, OR - #A23553.30000)

### **511. Public Concern: The Forest Service should identify the funding required to comply with environmental requirements.**

Identify the funding required to relocate, reconstruct or maintain the existing routes to ensure compliance with existing environmental requirements.

The work required to bring all areas into compliance with environmental regulations will require additional funding. While this proposal does not contain any request for additional funding, it is essential that the funding needs to be identified so that Congress can make better-informed budget decisions and so that the agencies can make better allocations of appropriated funding. This information will also provide a basis on which the agencies can form public-private partnerships to help resolve the issues. (Organization, Salt Lake City, UT - #A12009.17100)

### **512. Public Concern: The Forest Service should require that proponents of road construction bear the costs of damage to affected ecosystems.**

I propose that the proponents of any roads, and cost necessarily associated therewith (including, but not limited to, construction, re-construction, maintenance, signs, etc. and **decommissioning** cost if the road proves ecologically harmful or at such time as the road's proponents no longer desire or have approval for it, as well as also including all the indirect costs of negative environmental impacts produced by or resulting from such roads) bear all such costs in full, with none of those costs ending up being reimbursed and/or born by the peoples of the United States as a whole. These "costs", as the term is used here, must include all direct costs (as well as all indirect costs), such as damage to affected ecosystems resulting from the construction, maintenance, and use by proponents of such roads, e.g. sedimentation into watersheds, air pollution, loss of fragmentation of wildlife habitat, corridors, or habitat connectivity, entry of invasive non-native species, increased fire risks, etc. (Individual, Bishop, CA - #A20954.90130)

### **513. Public Concern: The Forest Service should allow expansion of current access only if a bond is posted sufficient to repair any accompanying damage.**

Existing access should be continued as long as it is in continuous use, retired if it is not, and subject to stringent review of any expansion that could damage the surrounding resources. Expansion of current access should require posting of a reasonable bond sufficient to repair any damage. Any development should be held financially responsible for damage and privately owned land condemned if damage is not remedied. (Individual, Santa Fe, NM - #A25545.40000)

**514. Public Concern: The Forest Service should provide funding to research the effects of habitat degradation.**

More funding is needed to provide for a better understanding of the effects of habitat degradation and to minimize the damages to forest/watershed ecosystems. This research would be linked with the authority to approve timber harvest and road construction and reconstruction in inventoried roadless areas as long as the least adverse impact is selected for a forest harvest plan. Build flexibility into the timber sale plans so managers can be responsive to disease and insect outbreaks. (Individual, Pelican, AK - #A26552.75600)

**515. Public Concern: The Forest Service should provide funding for reclamation projects.**

It has been my experience that there seems to be ample budget and agency motivation to cut more mature and old growth forest. Yet there seems to never be enough money available for some of the pending reclamation projects that are waiting in the wings. Some of these projects are relics of damage done by previous logging and road building. An example in my area is the effects of high altitude logging of Engelmann spruce and sub alpine fir forests. There are a number of areas that were logged at relatively high elevations and have never fully recovered and will not unless large-scale tree planting projects occur in the area. This type of reclamation would add to long-term benefits both locally and globally, yet are not an agency priority. Funding for projects such as this many times has to be acquired through grants from other entities. Meanwhile the Forest Service still spends many thousands of dollars in the NEPA process trying to justify logging and road construction in new areas. Environmental reclamation projects that help restore ecosystem functionality are the wave of the future. I hope the Forest Service eventually realizes this and begins to make this type of project activity the priority over outdated consumptive use projects. (Individual, Penrose, CO - #A21448.17100)

**516. Public Concern: The Forest Service should provide more environmental research funding.**

**AS LONG AS THE RESEARCH IS LINKED TO AUTHORITY TO APPROVE TIMBER HARVEST AND ROAD CONSTRUCTION IN ROADLESS AREAS.**

More funding is needed to provide for a better understanding of the effects of habitat degradation and to minimize the damages to forest/watershed ecosystem. This research would be linked with the authority to approve timber harvest and road construction and reconstruction in inventoried roadless areas as long as the least adverse impact is selected for a forest harvest plan. (Individual, Pelican, AK - #A26552.75600)

**Education**

**517. Public Concern: The Forest Service should educate the public.**

**ABOUT THE ENVIRONMENT AND ECOLOGY**

The best way for the Forest Service to work with a variety of interests such as; state, tribes and local interests is the help to educate them, the public about forest health and wild land. With a strong emphasis on environmental education and ecology. (Individual, No Address - #A17268.15163)

**ABOUT THE COSTS OF ENVIRONMENTAL DEGRADATION**

**We can't have unlimited use of fossil fuels and dependence on potentially enemy, oil producing nations without some losses.** We need to turn up the education of the general public about what those costs may be, which may include a permanent loss of long ago designated forest refuges. "Progress", including increases of fuel use, will eventually cause great harm to almost everything that this world has to offer, both under the soil and over it. Without informing the general global public (including the largest users, The American Public) I believe it may be a losing battle. (Individual, Knoxville, TN - #A19730.15163)

**ABOUT CONSERVATION GOALS**

Achieving the goals of conservation, wildlife protection, and sustainability of natural resources should be the highest priorities. Education of the public regarding these goals is needed. (Individual, Gallatin Gateway, MT - #A19100.50100)

**ABOUT THE NEED TO MAKE PRODUCTIVE USE OF FORESTS**

We appreciate this administration's work toward correcting the problems relating to imported Canadian lumber. But I am sure that most urban Americans do not even realize what has been happening to our timber industry. They do know that new housing costs have sky-rocketed. What they do hear is that loggers, miners, recreationists and cattle are destroying the forests. And they hear FS accused of "killing" endangered species every time they offer a timber sale or grazing lease. The urban public must be told the truth and educated on the real problems facing us and the necessity of using our public lands. We have worked in this type of education on a grassroots level but we do not have the financial resources or government accreditation to be accepted in schools or other public venues. It seems counter-productive that the federal government offers a multitude of funding grants to "conservation" groups, many times as partners with agencies, to provide "educational" materials promoting non-use of national forests, but there are no opportunities for wise-use and "multiple use" groups to present the production/use side of the debate. The FS has the resources and should use them as outreach programs to educate urban America. (Organization, Three Rivers, CA - #A28739.15163)

The FS should continue to manage national forests pursuant to Acts of Congress, which all mandate multiple use. The public must be educated on how our nation's economic independence is directly linked to natural resource production, which is largely derived from public lands. Natural resource production can be, and is being, done in an environmentally sensitive manner. Without natural resource production our nation's economy will suffer which is already evident in the current economic downturn and rising unemployment rate. (Organization, Three Rivers, CA - #A28739.15166)

## Evaluation of Roadless Areas

### Summary

Some people state that when evaluating roadless areas and making decisions, the Forest Service should only consider environmental factors. These respondents assert that national forests cannot accommodate every use and that claims that roadless areas need to be opened for economic reasons are false. Many other suggestions are offered regarding what the Forest Service should consider when evaluating roadless areas. Suggestions include the evaluation of ecosystems, watersheds, native biodiversity, sustainability, habitat requirements, and current conditions. One individual advises the Forest Service to determine how much land is required to assure the preservation, health, and limited growth of species whose population are declining.

### **518. Public Concern: The Forest Service should only consider environmental factors when making decisions.**

#### **BECAUSE NATIONAL FORESTS CANNOT ACCOMMODATE EVERY USE**

The Forest Service needs to adopt a philosophy that protection of the forest comes first, above all other interests. They need to be able to tell some people “NO that is not an appropriate use for the forest”. The National Forest can not accommodate every use, and it shouldn’t. For example—Just because someone comes up with a new type of off-road vehicle the FS has no responsibility to provide a place to use it. (Individual, Merion Station, PA - #A17478.50200)

#### **BECAUSE CLAIMS THAT THESE AREAS NEED TO BE OPENED FOR ECONOMIC REASONS ARE FALSE**

The only “characteristics, environmental values, social and economic considerations, and other factors” that should be considered in this decision are environmental ones. I do not believe there are any economic factors. The claims being made that these areas need to be opened up for economic exploitation are simply false. It is nothing more than the greed of powerful interests trying to disguise itself in the sentimentality of a rural life that does not and never did exist. (Individual, No Address - #A49.50000)

### **519. Public Concern: The Forest Service should evaluate roadless areas with respect to general environmental considerations.**

#### **EVALUATE ECOSYSTEMS**

In evaluating roadless areas eco-systems should be considered. Do the areas fit into protection of an eco-system or are they fragmented? Is the timber of great-value or marginal? What is the highest and best use of the land? Consider the wildlife. (Individual, Missoula, MT - #A113.50100)

At this time deforestation and the slow erosion of natural capital such as the declining species diversity and the loss of intact ecosystems compels us to protect what we have for future generations and especially to prevent predatory financial interests from taking that which belongs to all U.S. citizens and their progeny. The true value of the U.S. forest system is not being measured properly due to a limited economic view that sees our forests in board-feet measurements for timber sales, rather than as a priceless natural resource that provides invaluable services as an intact ecosystem. Those include but are not limited to: filtering pollutants out of the air and water, sequestering carbon to fight climate change, maintaining rainfall and local climate conditions, protecting the habitat of endangered species as mandated by law, providing recreation areas necessary for maintaining a superior quality of life, and finally are an essential part of the scenic beauty that forms the character and backbone of the United States. (Individual, New York, NY - #A395.50100)

The primary concern of the forest service in managing Roadless Areas ought to be protecting ecosystem integrity and creating wildlife corridors. The patchwork logging of the last 90 years has seriously impaired forest ecosystem integrity. A GIS analysis of logging in the Gifford Pinchot National Forest confirms this assertion. It is high time that the Forest Service start taking into account ecosystem function, rather than logging as fast as possible, in its planning. (Individual, Olympia, WA - #A614.50100)

#### **EVALUATE WATERSHEDS**

The local and national values of unburned watersheds and wildlife habitat must be incorporated into the equation. Though the tragedy of losing homes to wildfires is common in the media, the agency must publicly promote the social and economic value of a watershed that is not yet destroyed by a catastrophic forest fire. Until this evaluation is made public, the other concerns are secondary. (Professional Society, Chico, CA - #A29719.51310)

#### **EVALUATE NATIVE BIODIVERSITY**

The USFS must look at a wide array of values when evaluating roadless areas. Native biological diversity values must be taken into consideration. Many of our remaining roadless areas are home to some of the most endangered or rare species in North America. These areas are often headwater and are sensitive to the impacts of roads, such as sedimentation and simplification of channel structure. (Individual, Sandpoint, ID - #A28585.50100)

#### **EVALUATE SUSTAINABILITY**

Sustainability is the primary value to be considered when evaluating inventoried roadless areas. This means that decisions must be based on environmental, economic and social considerations for the local communities. The society of American Forests recently took a position on sustainability. I suggest you use this statement as guidance as you deliberate any action on a roadless directive. If the Forest Service maintains sustainability of the local community, it will also preserve sustainability for the region and the nation. (Business, Colbert, WA - #A17500.50000)

#### **EVALUATE HABITAT REQUIREMENTS**

The Forest Service should consider the wildlife and plant species, their habitat requirements, water quality, air quality, diversity of all species (mammal, plant, bird, fish, reptile, amphibian, etc.), and the interconnected parts of a functioning natural ecosystem in evaluating roadless areas. (Organization, Salt Lake City, UT - #A17170.50000)

#### **EVALUATE ROADLESS AREAS UNDER THE CURRENT CLIMATIC PERIOD AND RANGE OF VARIABILITY**

*Current climatic period – the period of time since establishment of the modern major vegetation types, which typically encompass the late Holocene Epoch including the present, including likely climatic conditions within the planning period. The climatic period is typically centuries to millennia in length, a period of time that is long enough to encompass the variability that species and ecosystems have experienced. Range of variability – the expected range of variation in ecosystem composition, and structure that would be expected under natural disturbance regimes in the current climatic period. These regimes include the type, frequency, severity, and magnitude of disturbance in the absence of fire suppression and extensive commodity extraction.* The above definitions do not meld with what you are presently trying to do in light of future evaluations of “roadless” areas during forest revision plans; in particular, areas that are prone to catastrophic fire. The present \$1.9 billion fire budget the forest service has for 2001 should be testament to failed policy over the last decade. The largest asset that forests provide communities (animals and human), is fresh water—the context of the above two definitions as used in the 2000 forest management plan in relation to roadless are not always conducive to this, either on private or federal administered lands. As used throughout the forest management plan, 219.36 is unworkable with environmental health at the urban/rural interface as demonstrated in the Bitterroot National Forests over the last two fire years. (Individual, Rock Springs, WY - #A15658.50000)

**520. Public Concern: The Forest Service should determine how much land is needed for ecosystem integrity.**

The emphasis needs to be put on exactly how much land is required to assure the preservation, health, and even limited growth of species that are experiencing dwindling numbers or are endangered. Once the proper amount of lands can be set aside to assure the preservation of these species, of which no person or government has the right to destroy, then we can use what other lands we have available more responsibly and effectively to appease purely human concerns. We need to have these plans made by intelligence and the input of the expert opinion of university scientists who have studied and know the best course of action as it relates to what is best for the survival of the forest ecosystem, not its destruction. It is essential that the Forest Service recognizes that its prime concern is the health of the forests, of which each one might be designated differently for use, but all of which should be properly and carefully maintained as complete forest ecosystems. Views that are harmful to the long-term survival of the entire forest should not be seen as real participants in the forest management. (Individual, Lexington, KY - #A1077.15167)

**521. Public Concern: The Forest Service should conduct an inventory of soil, water, and geologic resources.**

This list might include: An inventory of soil, water and geologic resources; an evaluation of their stability and suitability for various activities. (Business, Lewiston, ID - #A7991.50000)

## Management

### Summary

**General Comments** – General comments regarding management vis-à-vis the environment are highly varied. Some comment that the Forest Service should protect roadless areas to encourage energy conservation. Others suggest that certain land types be protected, ranging from the most ecologically important roadless areas to areas not designated as roadless. Writers also suggest management strategies—including connecting protected areas, managing forests through their entire life cycle, and combining the technical advances and experience of forest managers with the best available science to determine appropriate management.

**Ecosystem/Restoration Management** – A number of respondents suggest that the Forest Service should manage lands under an ecosystem management philosophy, but ideas vary on how to carry this out. Suggestions include managing roadless areas in an ecosystem based framework, managing with the principles of conservation biology, allowing natural processes to manage fish and wildlife species, and restoring natural disturbance regimes. Another respondent suggests that roadless areas be retained as scientific control areas. Some add that the Forest Service should engage the public in protecting the environment. One organization advises the Forest Service to focus on restoring degraded areas, while others state that the Agency should ensure the reclamation of developed lands.

**Multiple Use Management** – Some respondents assert that the Roadless Area Conservation Rule does not threaten the tradition of multiple use, while others believe the Rule implies preservation, not conservation, of which this person does not think follows the intent of multiple use management. Another respondent is of the opinion that the multiple use mandate is fulfilled by active management in roaded areas.

A number of respondents state that the Forest Service should allow multiple use and sustained yield management. These writers suggest attaining this objective by allowing the exercise of existing rights, by including recreational and economic uses, and by rotating roadless area

inventories. Some people claim there are already enough protected areas and by allowing any single use preference, such as ‘nonuse,’ to dominate unfair and in violation of the multiple-use mandate.

Other respondents assert that the Forest Service should not manage National Forest System lands under the multiple use philosophy because some uses should be strictly limited, because it is not realistic, and because there are limited areas that should not be jeopardized.

**Other Management Philosophies** – Several respondents provide other suggestions regarding management philosophies. One individual asserts that the Agency should look to our past and recognize that wilderness once lost, cannot be retrieved. Others maintain that Roosevelt’s conservation ethic stressed active management of forest lands, and thus the Roadless Rule stands in fundamental opposition to Roosevelt’s philosophy of conservation. Some also suggest developing policies for protecting and using forest lands which do not entail excluding people, and eliminating biodiversity and ecosystem management as management principles.

**Effects of Activities/Disturbance on the Environment** – A number of respondents comment that the Forest Service should consider the effects of certain activities and disturbances on the environment. Some suggest that fire results in greater environmental impact than other uses such as timber removal and road construction, while others advise the Forest Service to consider forms of damage to forests other than that of fire. Several respondents request that the Forest Service allow certain activities including environmental clean up, the use of all-terrain vehicles for managing habitat, and the commercial use of surplus plant and animal species.

Some respondents advise the Forest Service to consider the positive environmental effects of roads, fire, insects and disease, and downed timber. Some suggest that ecosystems need disturbance to exist and that the absence of timber management and fire control would cause a detrimental volume of additional stream sedimentation. Others suggest that, while these activities may not be beneficial, road construction and off-road vehicles do not endanger the environment.

Other respondents advise the Forest Service to address the negative environmental impacts of resource removal, mechanical forest health treatments, off-road vehicles, roads, mines, drilling, fire, and prescribed fire. According to one individual, erosion from large, stand replacing fires, that often seem to start from prescribed fires are relatively large, compared to similar sized tree removal areas.

## *Management General*

### **522. Public Concern: The Forest Service should protect roadless areas.**

#### **TO ENCOURAGE ENERGY CONSERVATION**

Keeping them roadless keeps heavy equipment from using fossil fuels to build roads, and keeps road users from using fossil fuels on the roads. Retaining roadless areas reduces greenhouse gas emissions . . . from destroying ecosystems through roading and associated uses, and from pulling up coal and oil from the ground and burning them, too. (Individual, Zephyr Cove, NV - #A27169.45100)

Another consideration is energy consumption. The more roads you provide for back road access, the more energy use that will encourage. Our future generations already face enough energy problems without creating more for them. (Individual, Lindsong, KS - #A13426.50000)

**523. Public Concern: The Forest Service should concentrate protection efforts on the most ecologically important roadless areas.**

The FS needs to take seriously the recommendations of environmental experts as far as what roadless areas are most important to protect from species and ecosystem standpoints. Need to make sure that the most important areas are protected, then let some of the other interests have their access if it conflicts with protection of biodiversity. Most other interests are not limited to roadless, wilderness areas like preservation of biodiversity is. Logging, mining, snowmobiles and dirt bikes can all use areas with existing roads. Grizzlies, wolves and cougars need large roadless protected areas to survive. (Individual, Seattle, WA - #A27495.50100)

**524. Public Concern: The Forest Service should protect areas not designated as roadless.**

If roadless areas do become protected, the Forest Service should not then ignore proper management of roaded, multiple-use areas. In other words, do not turn roaded portions of Forest Service lands into tree farms or ATV playgrounds because the "environmentalists" got the unroaded portion. (Individual, No Address - #A29377.50200)

**525. Public Concern: The Forest Service should protect areas adjacent to roadless areas.**

**TO PRESERVE THE ECOLOGICAL VALUE OF THE AREA**

Access to private inholdings and other properties is still guaranteed under the Conservation Rule. In fact, the forest service is required to provide access where demanded by such inholdings. In areas with heavily fragmented ownerships, such as in Chippewa and Superior National Forests, this is actually a flaw, because managers of our STATE forests can demand access to go in and cut wood adjacent to a roadless area. In an ideal world, those state entities would examine such areas and strive to make them contiguous roadless tracts, instead of insisting on harvesting timber there. My guess is if it is adjacent to national roadless areas, it would be of the same ecological value and ought to be preserved. (Individual, Minneapolis, MN - #A30387.40100)

**526. Public Concern: The Forest Service should combine the technical advances and experience of forest managers with the best available science to determine appropriate management.**

**TO MAINTAIN A HEALTHY ECOLOGY IN ROADLESS AREAS**

The technical advances and experiences of those engaged in tree management should be combined with the findings and conclusions of other scientists to determine the most appropriate actions, if any, that are needed to maintain a healthy ecology in the roadless areas. Again, nothing can replace reproducible experimental data and analysis as a guide in making management decisions. An important fact [often ignored by users of ecosystems] is that there is a minimal size and makeup of such a system if it is to be sustainable in the face of unusual climatic events. The degree of human pressure that can cause the ecosystem to live on the edge of survival may lead to sustainability only until a natural disaster occurs. (Individual, Cottonwood, AZ - #A26396.30100)

**527. Public Concern: The Forest Service should manage forests primarily for natural habitats.**

The PRIMARY use of national forests should be preservation of wildlife and natural habitats, as REPUBLICAN President and national forest founder Theodore Roosevelt intended. I would not expect wealthy oil men and oil-rich politicians to understand that, but that's how we who live and work near and in the national forests every day feel. (Individual, Black Hawk, CO - #A25654.50100)

**528. Public Concern: The Forest Service should connect protected areas.**

It is also important to note that to teach effectively and minimize costs, these backcountry areas need to be contiguous or connected in such a way as to provide seamless transitions. Islands of wilderness are not the answer. This has been illustrated in the ongoing White River National Forest planning process where one proposed alternative would designate more acres of Wilderness but provide for developed recreation across the remainder of the forests. Islands of Wilderness do not meet the needs of wilderness, wilderness managers, wilderness users or the flora and fauna inhabiting these areas. (Permit Holder, Golden, CO - #A29630.50520)

**529. Public Concern: The Forest Service should manage forests through their entire life cycle.**

Forests need to be managed through their entire life cycle. Some defined roadless areas have been harvested once or twice, regrow naturally or by replanting, provide habitat for wildlife, and at some point are ready to reharvest. As the forest matures, it happens to be generally roadless for awhile. That does not mean, at all, that it has to become a quasi-wilderness forever, which is the biggest problem with the RAC Rule. (Individual, Minneapolis, MN - #A18054.45100)

**530. Public Concern: The Forest Service should document the risks and impacts of management and non-management.**

It is imperative that the Forest Service requires that the risks and impacts of “doing nothing” be documented as well as an analysis of the risks or impacts of roading or other management activities. In the final decision, the standards for no management on federal forest lands should be as stringent as any standard for management activities. (Association, Augusta, ME - #A13312.30110)

**531. Public Concern: The Forest Service should return environmental policies to their status before the Clinton Administration.**

I am writing to encourage you to rescind the Forest Service’s Roadless Area Conservation Rule as it now stands. This policy is the product of the most extensive federal encroachment in history. It flies in the face of responsible conservation practices. The rule represents an over-balanced approach to environmental extremism, and makes the American people servants to the land instead of stewards over it. As written, it is patently unfair. This kind of bureaucratic regulation is not even constitutional law.

The best way to protect what you term roadless values is to return environmental policies to their status before the Clinton administration hijacked the land from the American people. (Individual, Carthage, MO - #A1102.10130)

***Ecosystem/Restoration Management*****532. Public Concern: The Forest Service should emphasize long-term protection over short-term profits.**

The roots of our government go back to daring foresight, deep intelligence and wisdom. I urge you, at this critical moment, to draw from these roots and raise the standard of our government’s values of our pristine forests to a more long-term, relevant and wise view than that of reaping short-term profits with devastating, lasting effects. We need the Wild Forest Protection Plan as finalized at the beginning of this year, not a policy that facilitates the bull-doing and consumption of these forests—at huge taxpayer expense—for short-term gain and resulting in, at best, after replanting, a Douglas Fir farm destined for future clearcutting and seriously lacking in flora and fauna, instead of the real thing. That is not the way to treat what remains of a national treasure teeming with life and that is not what we should leave behind for future generations. (Individual, Alexandria, VA - #A13348.30520)

**533. Public Concern: The Forest Service should recognize that short-term solutions will not fix long-term problems.**

I have faxed, emailed, and written many letters about the Roadless Area Conservation Rule, ANPR. I am very concerned about short term solutions to long term problems. These short term solutions will have long term effects on our planet, not just for us, but for generations to come. Please, please in your heart do what is right, as a Christian I don't see how God could understand how we are destroying His world . . . for money. (Individual, Brazoria, TX - #A4158.50300)

I feel like our national policies are too short term and should have a longer vision. (Individual, No Address - #A4753.50300)

**534. Public Concern: The Forest Service should manage roadless areas in an ecosystem based framework.**

Local forest planning is essential to management of roadless areas and was given that responsibility by the NRAC Final EIS Rulemaking process. The EIS/policy/rulemaking provided important management exception after exception to guide management of roadless areas (range management, forest health, fire management, public safety, endangered species and wildlife management, travel planning and management, etc.) An expansive national roadless policy detailing management principles—no road building or activities which inherently produce roads for commercial purposes (timber harvesting, some kinds of mineral development)—was developed because roadless areas have great national value and have literally driven broad, national forest policy for decade after decade of conflict and contention. It must be clear now, even to the “new” Forest Service, at this point in time, that protecting these roadless areas is crucial to initiating an ecosystem based framework for managing forest lands. Inherently, forest-by-forest planning fails at this landscape or ecosystem level, thus the need for a wide-ranging roadless area policy. (Organization, Hyrum, UT - #A13496.50100)

The notice proposed five principles on which “protection and management” of roadless values should be based. Yet curiously, not one of the principles mentions protection of the ecological values of roadless areas. The guiding principle of protecting roadless areas must actually be protecting roadless areas. The goal of these principles appears to be to provide a balance between roadless protection and other interests. However, the lack of principles relating to actual protection of roadless areas makes this much less than a balanced approach. Further, these principles are redundant. While protecting certain overriding public interests that may conflict with roadless protection is appropriate in some instances, the roadless rule as promulgated already provides for that balance. (Organization, Boise, ID - #A8240.50000)

**BY MANAGING WITHIN HISTORIC RANGES OF ECOLOGICAL VARIABILITY**

**DESCRIBING VALUES.** AOC supports national forest management policies that permit and encourage: **management** of resources within historical ranges of ecological variability. (Elected Official, Union County, OR - #A8707.50100)

**535. Public Concern: The Forest Service should manage roadless areas using the principles of conservation biology.**

The value of a forest lies in life itself for its own sake. The roadless areas should be managed to conserve plant and animal life in as nearly natural a state as possible. This should be accomplished by prohibiting most human disturbance, and by strictly regulating permitted activities (See Question 7). Some of the dimensions to be considered include: a) species diversity, b) relative species abundance, c) intact functional relationships within and between species, d) genetic variability. In other words, the roadless areas should be managed using the principles of conservation biology. (Individual, Dallas, OR - #A3697.50000)

**536. Public Concern: The Forest Service should allow natural processes to manage fish and wildlife species.**

Focus should be on preserving the existing national forests, not trying to create more. Our government needs to stop trying to play God, by reintroducing wolves, ferrets, or poisoning lakes to rid it of one species of fish just to plant a 'native' species. Let nature take its course, it really doesn't need our help. (Individual, Whitefish, MT - #A8765.30100)

**537. Public Concern: The Forest Service should restore natural disturbance regimes.****TO ALLOW THE BUILDUP OF COARSE WOODY DEBRIS AND LARGE WOODY DEBRIS**

Roadless area protection is needed to protect and restore the integrity of natural disturbance regimes (a hallmark of healthy forests)—small site canopy gaps as well as rare catastrophic disturbance (the spectrum of spatial and temporal scales). A variety of natural processes promote forest regeneration and create canopy openings and early successional habitat; logging is not necessary for these to occur. Coarse woody debris (CWD), large woody debris (LWD), and snags from dead and dying trees are a vital component of healthy forests, essential for sustaining the health of a multitude of terrestrial and aquatic populations and food webs. These materials gradually accumulate as a forest ages and becomes old growth. At present there is a paucity of CWD, LWD, and snags at most sites due to past logging that greatly reduced these inputs by removing the trees. (Individual, Staunton, VA - #A30027.30110)

**TO ALLOW REGENERATION OF THE FOREST FLOOR**

The forests should be protected and managed the same as they have been for centuries. Hasn't less intrusive management worked for wildlife and habitat? Wildfire burns (with contributing fuels) in remote areas do contribute to healthy forests, right? The regeneration of the forest floor after a burn from potash and nitrogen is incredible. (Individual, Hayfield, CO - #A13395.30100)

**538. Public Concern: The Forest Service should focus on restoring degraded areas.**

[Question 9] Focus on questions that can be resolved. Too much time is wasted on conundrums. There is a huge amount of work to be done in roaded areas, restoring and repairing past damage. Instead of an endless debate on whether to build a mile of road in a sensitive area, change the question. Focus on stewardship projects, restoration of damaged habitats, thinning and preventing further extirpation of threatened and endangered species. (Organization, Helena, MT - #A20598.50100)

**539. Public Concern: The Forest Service should ensure the reclamation of developed lands.****THROUGH TECHNOLOGY**

What are the characteristics, environmental values, social and economic considerations and other factors the Forest Service should consider as it evaluates IRAs?. The existence of technology to effectively reclaim the land, should development be determined appropriate. (Organization, Fairfax, VA - #A8036.50000)

**540. Public Concern: The Forest Service should engage the public in protecting the environment.****ENCOURAGE NON-PROFIT ORGANIZATIONS TO SUPPORT THE PRESERVATION OF PRISTINE AREAS**

I expect that if the Forest Service were to preserve some fraction of their lands in a pristine state, it would find that non-profit organizations similar to the National Parks Conservation Association (NPCA) could be set up to support this effort. Why not a National Forest Roadless Area Conservation

Association to help tap into private resources for protection of the ecological values of the forests? (Individual, State College, PA - #A15450.17130)

**ALLOW THE PUBLIC TO SPONSOR/ADOPT AN AREA OF THE FOREST**

How about getting a family, organization, business, etc, person, to sponsor a piece of forest like they do for medians and various areas in and around cities or along stretches of road? I could try to help sponsor the beauty of 20 acres somewhere. What a great idea. (Individual, No Address - #A5360.30200)

**541. Public Concern: The Forest Service should organize public/private partnerships to maintain and protect areas most in need of repair.**

Good stewardship of the forests requires a hands-on approach by the stakeholders of the forests. Much more can be done in organizing public/private partnerships to accomplish the goals of maintaining and protecting those national forest lands that are most in need of repair. These partnerships would also provide a way of educating the public about forest care and respect. Of course those who don't believe that people should be allowed in the forests will try to disrupt these kinds of efforts, but their ideology doesn't allow for good management and protection of the forests. (Individual, Denver, CO - #A26037.30100)

**542. Public Concern: The Forest Service should retain roadless areas as scientific control areas.**

Roadless areas provide a baseline for judging the impacts of more intense land-use activities on multiple-use lands. Because roadless areas in the Southern Rockies and elsewhere provide examples of ecologically healthy landscapes, they provide important opportunities to gauge the health of lands being managed primarily for resource extraction and more intense levels of use. Without roadless areas, there is no reliable ecological baseline to compare the relative health of our more intensely used lands. Thus, roadless areas are an invaluable tool for land and resource managers, helping to ensure the health of all our public lands. This requires substantial amounts of roadless lands in all ecosystem types found on the National Forest, as multiple-use lands occur on all ecosystem types. (Organization, Boulder, CO - #A22130.45100)

If naturally caused forest fires, insect outbreaks, etc. occur, they occur. We are in desperate need of some very large areas that are allowed to live truly naturally, dealing with whatever happens naturally. To assume that present management practices, however carefully devised, are perfect is a serious mistake. In fact, in my opinion, it is a frightening form of intellectual arrogance. I hope we can agree there is much we do not know about forest ecosystems. That is why it is so critically important to leave some very large ones—across the nation—*alone*. Present management practices may be causing harmful effects of which we are utterly unaware at this time. How can we possibly know what the effects of present or future management practices are if we have nothing against which to compare? (Individual, West Swanzey, NH - #A15665.30100)

**GRAVINA, SOUTHEAST ALASKA**

I've suggested Gravina should be retained as a scientific control area from which to compare the already extensively roaded and clear cut regions of SE Alaska. The cumulative impacts of non-USFS lands must be considered as well. There are numerous options for both consumptive and non-consumptive uses of these areas that do not require roads. (Individual, Ketchikan, AK - #A13522.50000)

**543. Public Concern: The Forest Service should recognize that timber interests have marginalized ecological forestry.**

We have been, ostensibly, discussing ecology and conservation for at least thirty years in relationship to management of our National Forests, and of course these concerns were supposedly originally present when Mr. Roosevelt created the USFS a hundred years ago. The problem—especially since the end of WWII—is that the raw financial and political power of the timber industry has marginalized these discussions and any sweeping, meaningful, practically effective implementation of ecological science in

the management of these forests. “Forestry” has been defined by the industry, not ecologists, and only in the past ten years has there even been flirtation with ecological concepts and actualizing them at a management level. (Individual, Williams, OR - #A17130.15122)

## *Multiple Use Management*

### **544. Public Concern: The Forest Service should clarify the meaning of multiple use.**

What is the meaning of Multiple Use? I could ask 10 Agency employees and would get 10 different answers. A myriad of activities occur on National Park managed lands. Yet, National Parks (even with commercial activities) are not considered multiple use lands. Why? Why is the USFS considered multiple use and the NPS is not? Does multiple use mean that logging and mining may occur? If so, lets say so. We continually get requests to implement various projects on NFS managed lands by proponents. Most are money-making opportunities on Federal lands. There is nothing inherently evil about that. However, many of these projects are inconsistent with the long-term goals of the streams and the land. In these instances, time after time, the proponents vehemently argue that their project must be moved forward regardless of impacts because the USFS is a ‘multiple use’ agency. What is the difference between the NPS and the USFS as it relates to ‘multiple use.’ (Individual, Grangeville, ID - #A1578.15161)

### **545. Public Concern: The Forest Service should base multiple use management on local citizen needs.**

To illustrate the importance of decision making at the local level, all stakeholders present for a planning meeting for the Burro Mountains in the Gila National Forest in southern New Mexico stated, “the Burro Mountains need to be managed for multiple use.” In other words, access needs to be provided for all activities in the National Forest System. As such, NMDA [New Mexico Department of Agriculture] requests the FS base national forest management decisions on a rigorous analysis of multiple use needs of the local citizenry. (State Agency, Las Cruces, NM - #A18061.50200)

### **546. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule does not threaten the tradition of multiple use.**

As an Eastern Washington resident, I understand the value of having our National Forests managed for multiple use.

Already the vast majority of National Forests support diverse activities such as grazing, logging, mining, and recreation. The roadless rule does not impact these activities at all and as such does not threaten the tradition of multiple use. (Individual, Ellensburg, WA - #A1895.10110)

### **547. Public Concern: The Forest Service should recognize that maintaining forested areas without roads is an appropriate measure in the context of multiple use management.**

The Roadless Rule is a good example of progressive land management based on science and a recognition of all forest values. The February 2000 issue of Conservation Biology included a special section (9 papers) on “Ecological Effects of Roads.” An article by Trombulak and Frissell concluded: “We reviewed the scientific literature . . . and found support for the general conclusion that they [roads] are associated with negative effects on biotic integrity in both terrestrial and aquatic ecosystems . . . Our review underscores the importance to conservation of avoiding the construction of new roads in roadless or sparsely roaded areas . . . [and] it is critical to retain remaining roadless or near roadless portions of the landscape in their natural state . . .”

Maintaining forested areas without roads is an appropriate measure in the context of multiple-use management. Multiple use of national forests has never implied building roads and authorizing extractive use and high-tech recreation on all areas outside of Wilderness. We, and future generations,

will benefit from national forest landscapes that have not been roaded. (Individual, West Glacier, MT - #A5946.45100)

For the Forest Service to attribute to roadless areas values beyond traditional multiple use values leads to a legal trap that the Forest Service should avoid. In theory, the “release” language in the 1980s Wilderness acts was intended to help solve this problem, it didn’t. Multiple use management certainly includes values that require that some areas not be roaded. The NFMA forest planning process is the mandated, appropriate and adequate way to handle this. (Individual, Spokane, WA - #A17819.50200)

**548. Public Concern: The Forest Service should recognize that preservation is in opposition to multiple use.**

When the term Roadless Area Conservation is claimed by the Forest Service, in my mind it is not conservation; rather they are saying PRESERVATION and I object to that. The whole premise of “protecting” our forests is a false one and is in direct opposition to the Forest Service foundation of multiple use. (Individual, Bellvue, CO - #A13383.50200)

**549. Public Concern: The Forest Service should recognize that roadless area values are attainable through multiple use management of roaded areas.**

I recommend that you carefully and clearly identify those products, services, and conditions of national forest lands that can be provided under responsible multiple-use management and do not require the restrictions inherent in roadless/Wilderness area designation. Many of the benefits claimed for roadless areas in former President Clinton’s speech announcing this initiative, in Forest Service press releases, and in the Forest Service’s background statement in the NOI were fully attainable though the multiple-use management of roaded areas. (Professional Society, Orono, ME - #A17644.50200)

*Allow Multiple Use Management*

**550. Public Concern: The Forest Service should allow multiple use and sustained yield management.**

Multiple-use of our national forests makes healthier forests, healthier local economies, better wildlife habitat, helps our schools and county roads, and makes more recreational opportunities such as huckleberry-picking, photography, and good-panning. The availability of small fast-and-pole and firewood permits are also beneficial to local citizens. (Individual, Stevensville, MT - #A2357.50200)

**BY ALLOWING THE EXERCISE OF EXISTING RIGHTS**

North Dakota Farm Bureau believes the most effective utilization of public lands is the multiple-use concept, including agriculture, mineral development and recreation. Any land management decisions should be site specific at the local level. Existing rights should be allowed, such as water rights, grazing permits, right of access, etc. (Association, Bismarck, ND - #A30187.50200)

**BY INCLUDING RECREATIONAL AND ECONOMIC USES**

We continue to be a strong supporter of the concept of multiple use for public lands within the State of Nevada. These uses include recreational (hiking, camping, bicycling, horse backing, hunting, fishing, cross-country skiing, snow-shoeing and off-road vehicle use), and economic uses such as mining, livestock grazing, timber harvest and guided tours (i.e. snowmobile and off-road vehicle use). (Elected Official, Douglas County, NV - #A22071.50200)

**BY ROTATING ROADLESS AREA INVENTORIES**

The forest is a renewable economic resource. Dynamic natural forces as well as man’s activities have an impact on current forest conditions and are important factors in making management decisions. Harvesting forest products such as timber, forage and wildlife should be managed in a way to provide ongoing multiple use and sustained yield. To accomplish this, it may be necessary to rotate roadless inventories from one section of the forest to another. We believe that the roadless inventory should be

periodically updated in order to keep the database current. Expansion of roadless acreage is not necessary. (Association, Sandy, UT - #A15818.30200)

#### **BECAUSE IT BEST MEETS THE NEEDS OF THE PEOPLE**

Multiple use management will best meet the needs of the public and provide an equal and equitable management plan. We encourage reinstatement of these goals. (Organization, Great Falls, MT - #A17098.50200)

I think this question can largely be answered by recommending that the forest service follow the tenets of multiple use management. These areas are the public's domain, and all the interests of the public should be able to be potentially accommodated. This cannot happen if large chunks of forest are declared "off-limits". (Individual, No Address - #A27249.50200)

#### **BECAUSE THERE ARE ALREADY ENOUGH PROTECTED AREAS**

There are many inventories roadless areas, wilderness study areas, and designated Wilderness areas within our backyard. We value all these areas for their beauty, the wildlife, the solitude, and the peace of mind they bring to us. But enough is enough. There are designated areas where each of us can enjoy our very own "special" values. Montana does not need more designated wilderness. We have participated in volunteer work with the local Forest Service for many years. We have created a feeling of ownership by protecting the environment with erosion control, weed abatement and improved public safety. Multiple use values should be returned to the process. (Organization, Great Falls, MT - #A17098.50200)

The National Forest system contains 192 million acres. Of this, 42 million acres, or 22%, are currently preserved in special designated areas (wilderness or other naturally managed areas) where road building, timber management, and other types of permitted uses are not permitted. The IRAs consist of another 54.3 million acres, or 28% of the lands managed by the Forest Service, of which some acreage (the reader of the decision is hard pressed to determine how many) is going to be recommended for additional wilderness designation. In addition, there is a large inventory of parcels "less than 5,000 acres in size"; depending on the outcome of the Roadless Initiative, these parcels could be withdrawn from multiple use. Thus, at a minimum, 50% of the National Forest lands will be withdrawn from the majority of the users. At the same time, user numbers for National Forest lands increase yearly. Where are all of the users going to go? The decision alludes to the fact that other federal and private lands have future opportunities for the additional users, but then falls short of any sort of evaluation of how this is going to be accomplished or how the public is going to be informed of this new "Don't Use the National Forest" strategy. Such a significant change in policy, more than doubling the amount of land area that will no longer be available for multiple use, deserves more careful consideration than the process employed at this point. (Permit Holder, Mammoth Lakes, CA - #A21901.50200)

#### **BECAUSE ALLOWING ANY SINGLE USE TO DOMINATE THE PUBLIC LANDSCAPE WOULD BE UNFAIR**

The Forest Service should be protecting this land FOR the public, not FROM the public. In its efforts to meet its multiple-use mandate the Forest Service will undoubtedly have to balance the use preferences of a variety of users. Allowing any single use preference, such as "nonuse", to dominate the public landscape would be unfair and in violation of the multiple-use mandate. (Individual, Canyon Lake, TX - #A3666.50200)

#### **AS REQUIRED BY LAW**

We cannot make decisions about resources we have failed to identify. Any modifications to the Roadless Area Conservation Policy must take into consideration the need to access the national forests to provide for Congressionally-mandated multiple uses. (Individual, Laramie, WY - #A949.50200)

The plans must provide for multiple use as provided in The Multiple Use Sustained Yield Act of 1960, taking into account the "coordination of outdoor recreation, range, timber watershed, wildlife and fish, and wilderness". (Individual, Anaheim, CA - #A953.50200)

The management for multiple use works when it's allowed to, when forest professionals are allowed to make their best professional decisions and then implement them. If fuel levels are high, allow for fire wood removal or select timbering, allow for primitive recreation, both motorized and non-motorized, encourage the public to enjoy the solitude that their public lands can afford them. The prescription works when it's allowed to, otherwise the anti-recreation lobby couldn't continue to find millions and millions of acres managed under the multiple use mandate every year that now qualifies for Wilderness designation. (Individual, Los Alamos, NM - #A3720.50200)

**551. Public Concern: The Forest Service should reexamine forest plans to ensure that multiple use requirements are being met.**

It is notable that during the LRMP process the Forest Service noted that a 10% reduction in timber sale outputs would be a significant change that would trigger a revision or amendment. The significant nature of the reduction warrants a reexamination of the forest plans to determine whether the multiple use requirements are still being met, and if not steps should be taken to revise land use allocations to restore multiple use management. (County Attorney, Grant County, OR - #A17667.50200)

**552. Public Concern: The Forest Service should manage national forests for sustainable use.**

I strongly oppose any weakening of the Roadless Area Conservation Rule. I am a passionate supporter of preserving the remaining tracts of unroaded areas. They represent a small portion of the productive forest acreage available to us. We have put vast tracts of the forest into wood products production. If we are any kind of stewards of the land, and if we have any skill and knowledge about achieving sustained yield, we can maintain an adequate flow of material (and jobs) from the huge areas of forest already in commercial use. (Individual, Eugene, OR - #A276.75400)

**BY IMPLEMENTING RESTRICTIONS ON TIMBER REMOVAL METHODS AND PRACTICES**

Unlike most other "tree huggers", I would like to see some of the trees in our forest lands harvested. HOWEVER, I don't want to see roads nor clear-cutting as being a part of that harvest. I feel that:

1. The Forest Service should select the trees that may be harvested;
2. Commercial loggers must pay a fair price on all trees harvested;
3. No roads can be constructed into any part of our National Forests for logging purposes;
4. Loggers will have to do all of the cutting and trimming;
5. Helicopters will have to pick up the logs and remove them from the forest.

Will it be expensive? Yes, it will be for the loggers, but not for the taxpayers. Will it cost the taxpayers anything? No, it should put money into our treasury if loggers pay a good price for our logs. Will it cost consumers more for lumber? Certainly, it may even cause industry to conserve wood products more effectively (wood pallets, for example, are often used once, then tossed). (Individual, Random Lake, WI - #A4620.75400)

*Do Not Allow/Reconsider Multiple Use Management*

**553. Public Concern: The Forest Service should not manage National Forest System lands under the multiple use philosophy.**

Perhaps it is time to reconsider our 19th century economic model based on extraction. Why doesn't the Forest Service lead the way by changing the management approach and the ill-advised Multiple Use concept to one that protects, restores, and celebrates our heritage of wildness? (Individual, Florence, MT - #A7.50000)

**BECAUSE SOME USES SHOULD BE STRICTLY LIMITED**

The idea of multiple use is not really workable when the numbers and demands become mutually exclusive. Perhaps it is time to scrap MUSY in favor of more realistic management policy—one that gives precedence to maintaining the forests' ecological integrity rather than its utility for extraction

industries. Short of scrapping MUSY, the Forest Service should recognize that some uses are much harder on the forest and even other types of uses, and should therefore be more strictly limited. Logging, mining, and drilling obviously destroy forest resources and preclude other uses. Motorized users are not mutually compatible with simultaneous quiet uses; they also harm the forest. These types of uses should be strictly regulated and possibly curtailed. (Individual, Crested Butte, CO - #A21816.50100)

#### **BECAUSE IT IS NOT REALISTIC**

The idea of multiple use management on all public lands is an admirable goal but not a realistic one. (Permit Holder, Rifle, CO - #A29619.50200)

#### **BECAUSE THERE ARE TOO FEW FORESTS LEFT TO JEOPARDIZE THEM ANY FURTHER**

At one time, the mandate of the Forest Service called for “multiple use”: preservation, recreation, logging and mining. At one time, this policy may have made sense. Certainly today, it no longer does. For a variety of interlocking reasons, both economic and environmental, multiple use is no longer the correct way to manage our national forests. Our country has too few forests left to jeopardize them any further. (Individual, Candler, NC - #A160.50200)

We have despoiled way too much of our public lands through the concept of multiple use. This is a polite term for theft cloaked as necessity. (Individual, Harmony, MN - #A43.50200)

### *Other Management Philosophies*

#### **554. Public Concern: The Forest Service should manage roadless areas according to the philosophy of Theodore Roosevelt.**

We need to look at these issues as one of our greatest presidents, Theodore Roosevelt, would have us do. Wilderness lost is wilderness never to be regained. Logical, intelligent land use is an imperative. (Individual, Centre Hall, PA - #A3965.50000)

#### **555. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule opposes the Roosevelt philosophy of conservation.**

Even more ironic was the feeble attempt by President Clinton to claim the conservation mantle of Roosevelt and Gifford Pinchot. Clinton invoked Teddy Roosevelt nine times in his speech announcing this initiative. But this initiative stands in fundamental opposition to Roosevelt’s philosophy of conservation and to his record of accomplishment.

Roosevelt’s conservation ethic was summed up in a speech at Osawatomie, Kansas on August 21, 1910, when he said, “**Conservation means development as much as it does protection**”. And what did he mean by development? His autobiography boasts of the “roads, trail, and telephone lines” that began “to be provided on a large scale” on National Forest lands under his Administration. Roosevelt emphasizes that, once he had Pinchot and professional foresters in charge of the National Forests, they proceeded without delay to “open all the resources of the National Forests to regulated use”. He further points with pride to increasing timber sale income from National Forest lands by more than fourteen-fold in three years.

The Clinton Administration, by way of contrast, boasted of eliminating 2/3 of the timber sale program since taking office, and hoped to make this non-use-non-management philosophy permanent. In point of fact, based on the words and actions of both men, Clinton had an approach to National Forest management that was roughly opposite to that of Roosevelt. Those of us who believe in the philosophy of multiple use are the true philosophical heirs of Teddy Roosevelt. (Organization, Missoula, MT - #A28141.50200)

**556. Public Concern: The Forest Service should develop policies for protecting and using forest lands without excluding people.**

Western governors, congressional leaders, recreation groups, resource businesses, property owners and citizens are working together to support our rural communities, and to advance new ways to protect the environment while simultaneously providing the public with the important natural renewable resources these lands provide. It's time, through your leadership, to advance policies for protecting and using forest environments without excluding people. (Individual, Scotts Valley, CA - #A2876.50200)

**557. Public Concern: The Forest Service should eliminate biodiversity and ecosystem management as management principles.**

Eliminate "biodiversity" as a management concept, goal, or operational principle.

Eliminate "eco-system management" as a management concept, goal, or operational principle.

No more interpreting multiple-use to put people's activities last. (Individual, Greeley, CO - #A28995.50200)

*Effects of Activities/Disturbance on the Environment*

**558. Public Concern: The Forest Service should consider forms of large-scale damage to forests other than that of fire.**

**INCLUDING HUMAN CAUSED DAMAGE**

*Protecting forests from the negative effects of severe wildfires and insect and disease outbreaks.*

How does the Secretary propose to expose the forest to the positive effects of severe wildfires while protecting them from the negative effects of the same? One process usually results in a host of effects and these effects usually show some distribution over whatever range of parameters you choose.

Protecting forests from catastrophic [fire] is fine, but there are other forms of large-scale damage to forests that are not mentioned in this statement, especially those caused by mankind: changes in atmospheric composition (for example introduction of copious quantities of sulfur which leads to acid), demands for access (leading to fragmentation of forest tracts, reduction of water quality, and loss of habitat by the building of roads), and demands that value be measured in dollars only (there are many ways to make money, many ways to obtain energy, many way to build structure, but there is no way to make a forest—to date, people have demonstrated only that they can destroy forests en mass via clearcutting or destroy forests slowly, piece by piece, as we are dong right now with this letter, this discussion, and this entire issue. (Individual, Nederland, CO - #A19016.11130)

**559. Public Concern: The Forest Service should recognize that fire results in greater environmental impact than other uses.**

**TIMBER REMOVAL**

One last thought, doesn't it seem rather hypocritical that the same environmental groups who protest a 40 acre logging job stand silently by, as millions of acres burn, causing air pollution, destroying wildlife, wildlife habitat and with no vegetation soil erodes into steams and rivers. The 40 acres will normally be replanted within a year. In 4 to 5 years there is a new healthy stand. A forest fire, if not enough will sterilize the soil and any regeneration will be a long time coming. (Individual, Olympia, WA - #A11810.50000)

**ROAD AND FIRE LINE CONSTRUCTION**

The huge Yellowstone National Park fire demonstrated that active road building and fire line construction results in much greater stream sedimentation and adverse impacts to aquatic resources than the fire itself. (Individual, Juneau, AK - #A23242.30100)

**560. Public Concern: The Forest Service should recognize that some activities do not endanger the environment.****ROAD CONSTRUCTION**

The mountains are still there, the creeks are still there, wildlife is still there, sagebrush is still there, etc., etc. The premise that roads destroy an area is pure nonsense. They allow all of us to enjoy and access our back yards. (Individual, Ketchum, ID - #A388.50000)

**OFF-ROAD VEHICLES**

All too often it seems we in the ORV community are automatically considered scofflaws and anti-environmental neanderthals simply because we enjoy the natural wonders of our great nation from the seat of a motorized vehicle. From my perspective, this could not be further from the truth. From my childhood days growing up in the backwoods of Maine to my current middle aged radial on the great circle of life, I have always enjoyed the natural wonders of our United States and have tried hard to make sure the impact of my adventures have been minimal. I was taught the basic tenets of the Tread Lightly philosophy by my parents long before the Tread Lightly, Inc. program was organized into the form as it exists today. I and all of the other ORV users I know adhere to these same tenets as we partake in the enjoyment of our public lands. To automatically label us as anti-environmental and/or dangerous to the environment simply because we drive an ORV is to ignore the simple truth. (Individual, Saint Louis, MO - #A629.50000)

**561. Public Concern: The Forest Service should use all-terrain vehicles for managing the habitat of all the forests and grasslands in the United States.**

I suggest that the use of other ALL Terrain Vehicles are cheaper and better to use for managing the habitat of all the forests and grasslands of the U.S.A. All the forests are being deteriorated by wildfires because of negligence of people getting too close that are not responsible for their actions and it will only get worse when there are more roads going to and through them. (Individual, Jamestown, IN - #A10964.30200)

**562. Public Concern: The Forest Service should permit environmental clean-up activities.**

Allow for an environmental cleanup, when there are existing statutory or treaty rights, or when there will be irreparable resources damage, or there are hazardous road conditions, development of Federal Aid Highway projects, or the continuation or renewal of mineral leases on current leased lands. (Tribal Government, Lapwai, ID - #A11821.90110)

**563. Public Concern: The Forest Service should prohibit the collection of animal and plant specimens.**

In order for the process to reach its full environmental and scientific potential human activities within those designated areas should be kept to an absolute minimum.

The following activity shall be expressly prohibited: Collecting animal and/or plant specimens. Permits could be issued for bona fide scientific purposes. (Individual, No Address - #A26840.90000)

**564. Public Concern: The Forest Service should require a permit for destructive sampling of the forest biosystem.**

Non-destructive data-collection should also be allowed, to assess the biodiversity and "health" of the roadless area. Destructive sampling of the forest biosystem should require a permit from the forest service. (Individual, Olympia, WA - #A25533.90110)

**565. Public Concern: The Forest Service should allow the commercial use of surplus plant and animal species.**

**AS DETERMINED BY MONITORING TEAMS**

Allow exploitation of all surplus plant and animal species, as determined by interdisciplinary roadless areas monitoring teams. (Individual, Cleveland, OH - #A26411.90000)

*Positive Effects*

**566. Public Concern: The Forest Service should consider the positive environmental effects of activities/disturbance.**

**ROADS**

I wonder, after a road is built does it not become a natural fire break? The natural grasses and foliage that fill the sides of the road creates feed for wildlife, and mankind has a chance to use the road for pleasure and economic benefit. I'm sure there was some erosion when the road was built but it diminishes with time. By rebuilding and removing the road twice, how much silt and erosion does this cause? Now there will be the concern of erosion after the fire is out. I bet you a Montana T-Bone steak it is a heck of a lot more. (Individual, Kalispell, MT - #A13362.52210)

In my experience as a fire watch for a logging company, all species of wild life travel the logging roads rather than through the brush or rugged terrain. (Individual, Cottage Grove, OR - #A11071.53000)

**FIRE**

Forest fires should not be thought of in a negative way. Forest fires can be compared to sharks in that they both get a bad reputation because the public is not informed on the issue. Fires are a very good thing for the environment and can actually improve conditions in the forests. We as a nation have almost been too good at preventing forest fires because according to the U.S. forest service about 110 million acres of woods are in poor health ("Playing"). Poor health of trees can be contributed to dead trees and the fact that forest floors are cluttered with dead wood and debris that prevent new, healthy trees from sprouting. Trees need sunlight to grow and if the ground is covered with underbrush it is very difficult for new seedlings to develop. Controlled burnings would remove the clutter and the ash would provide nutrients for the next generation of trees. As well, trees that die as a result of a fire will eventually topple over and disintegrate, nourishing the soil and insects. As well, the fire will melt pinecones and release their seeds, which could become the next generation of trees (Hyman). When snow melts in the spring, the water will carry nutrients from dead trees and plants into the surrounding waters, which will be a boost to insects and fish that prey on insects. As a result of the fire cleaning out the forest floor, this will open up space that will allow plants to grow back quickly. (Individual, No Address - #A30364.30310)

Most natural events that might be considered catastrophes actually have beneficial consequences for the long-term health of ecosystems. Fires for instance are necessary to burn-off dead vegetation and germinate the seeds of some species. (Individual, Albuquerque, NM - #A23820.30100)

Federal restrictions on road development on the surface also seem environmentally friendly from a standpoint of specie preservation. But in fact, it could be the opposite. Wildfire threatens the safety of many rare and endangered plant species throughout the national forest system. Without small-scale road development in fire prone areas of the forests, fires could spread quickly with no hope of containing the flames. Intervention is necessary on the part of local forest rangers, and without it many species could perish. Local fire prone areas are well known by the forest rangers, and a federal restriction that prohibits access to these specific areas could endanger many species. (Individual, No Address - #A29623.30200)

### INSECTS AND DISEASE

Much of the managed forests of the sierra cascade region are lacking in wildlife habitat trees (snags) because of the removal of “decadent” trees and management decisions that target dwarf mistletoe and insect infestation. These two processes are integral to the dynamic functioning of natural forests. Dwarf mistletoe “infestation” of stands and individual trees creates irreplaceable habitat for a wide variety of birds according to a study published by Robert Bennetts (The Influence of Dwarf Mistletoe Infestation on Bird Communities in Colorado Ponderosa Pine Forest, Colorado State University, 1991). Dwarf mistletoe traditionally has been viewed as a forest pest because of reductions in timber volume. Bennetts’ data suggest that dwarf mistletoe has a positive influence on abundance and richness of bird communities. An alternative view of dwarf mistletoe is warranted in the context of an ecological disturbance process and its influence on wildlife and forest structure. The ecological role of dwarf mistletoe is certainly not limited to snag recruitment in that it provides nesting and forage habitat for sensitive species as well as their prey base (Pgs. 22-23 Bennetts). The silvicultural goal of thinning trees to improve vigor and reduce mortality needs to be assessed in terms of eliminating opportunity for snag recruitment and other habitat requirements. This is particularly true in designating High Value Habitat Areas such as roadless areas. (Organization, Chico, CA - #A25114.31210)

The agency asserts or implies that natural diseases and insects that may kill trees are automatically harmful to forest health (DEIS 3-109). This not only unreasonably presumes that cutting and removing trees cures or prevents diseases or insects, but also concludes that not logging roadless areas is undesirable. The positive aspects of insect and disease outbreaks are omitted from the discussion. Ignored are such beneficial affects as resultant increases in CWD and habitat/niche complexity, thinning of overstocked stands, desirable alterations in stand species diversity and composition, creation or facilitation of early successional habitat, and greater age class diversity. (Individual, Staunton, VA - #A29325.30100)

A common example from Virginia of the agency’s improper presumptions as regards “forest health” underscores the need for tightened proscriptions and improved analysis. It is often simply assumed that widespread gypsy moth mortality will be severe in the long-term (GWNF Panhandle timber sale EA-3). However, this is not consistent with information in the tiered-to GWNF FEIS. The agency found that they cannot predict which stands will be damaged severely by gypsy moths (GWNF FEIS at 3-49). And the agency found that silvicultural practices will not control gypsy moth populations. See FEIS, Response at I-404. The agency also found that most of the oaks are not being destroyed in gypsy moth impacted areas. See FEIS, Response at I-396-397. Also ignored is the recent substantiated collapse of gypsy moth populations (see, e.g., GW-JNFs 1997 and 1998 Monitoring Report at page 84). Importantly, it has been established that a reduction in the proportion of oaks resulting from insects or other natural factors is beneficial as it reduces the subsequent susceptibility of the sites to gypsy moths. As regards gypsy moth or other insect and disease impacts, the affects and substantial benefits to forest health from not logging have not been fully and fairly considered. Scientific information on this relevant factor comes from the agency’s own research scientists. (Individual, Staunton, VA - #A29325.31200)

### DOWNED TIMBER

Bark beetle infestations are as natural to the forests as the trees themselves. Given that old growth is most susceptible to attack, it is important to remember large down wood benefits wildlife and helps prevent catastrophic wildfires by holding large quantities of water on the forest floor (See enclosure referenced above). (Individual, Penn Valley, CA - #A12007.31200)

Healthy coniferous forests are a mix of early, mid and late seral live trees up to 500-600 years of age. Included are shrubs and grasses along with many dead and dying trees. The most important factor for wildlife is a reliable, year-around, food source. Shelter and unfragmented habitats are next. Actual forest health hinges on the number of large softwoods present, such as snags and large down logs. Large down logs are essential to forest health, sometimes called the “foundation of the ecosystem.” They hold massive amounts of water on the forest floor, enrich soils and support myriad wildlife species. Remembering that the cellular structure of large dead woody material can hold up to three times its dry

weight in water is important because it is this kind of wood that helps maintain dampish and cool forest floors. These wet, fire resistant microclimates are further enhanced by the cooling effects of natural forest shading as measured through canopy closure. The key points are that as summer begins, a completely saturated tree branch 2 inch in diameter has only a four-day timelag between wet and air-dry while a 30-inch log has a 180-day timelag. The major problem here, is logging removes the larger wood that would ordinarily grow old and die. Thus, logging interrupts the forests' natural resistance to catastrophic wildfires in several ways: 1) the cooling effects of uncut forest canopies (shading) are lost; 2) moisture 'reservoirs' or the 'holding-tank' qualities inherent to large down wood is lost over the short and long term; and 3) the logged over areas are typically knee deep with small limbs and other discarded logging slash. This highly flammable material dries quickly in the increased sunlight caused by the logging. Worse, more small diameter fine fuels sprout rapidly and grow up among the dry slash. (Individual, Penn Valley, CA - #A12007.60000)

**567. Public Concern: The Forest Service should assess the volume of additional stream sedimentation that will occur because of the absence of timber management and fire control.**

**ASSESS THE DAMAGE THIS WILL CAUSE TO THREATENED AND ENDANGERED SPECIES**

Since logging will be banned or nearly banned from this 50 million acres, built up fuels will make the forest susceptible to devastating wildfires. So the first question for the EIS should be, how much particulate will be released into the atmosphere from these fires? How much CO<sub>2</sub>? When land is logged, the riparian zones can be segregated out and left alone. Wildfires have no such discrimination. How much damage will this initiative cause to riparian zones from the inevitable, uncontrolled wildfires? Many of us have seen the spectacular stream sedimentation that can occur after wildfire, such as the mud flows currently occurring in the Bitterroot. So we would like an assessment of the volume of additional stream sedimentation that will occur because of the absence of timber management and fire control. We want to see an assessment of the damage this will cause to threatened and endangered species, particularly salmon and bull trout. We want to see an accounting for effects such as the Tanner Gulch fire in Oregon, the consequences of which wiped out salmon in that drainage. (Organization, Missoula, MT - #A28141.50000)

**568. Public Concern: The Forest Service should allow stewardship timber removal.**

**TO INCREASE THE ABUNDANCE OF DEAD WOOD ON FOREST FLOORS**

Road construction or reconstruction is unnecessary for the management of healthy forests in roadless areas. Where healthy, native forests persist, natural fire outbreaks and windstorms are natural disturbances to which the forest is well adapted. In fact, these processes are important for the maintenance of biocomplexity in forested landscapes. Where logging has already occurred in roadless areas, or inventoried roadless area where road construction is permitted by management prescriptions, some stewardship logging will be required to alleviate the overcrowding and homogenous characteristics of biological simple, even-aged managed forests. Logging for stewardship logging. Since dead woody debris is a vital component of forest ecosystems, is often lacking in managed forests (due to 'salvage' operations), a further benefit of stewardship logging would be to increase the abundance of dead wood on forest floors. (Individual, Seattle, WA - #A29812.30100)

**569. Public Concern: The Forest Service should consider that some ecosystems and threatened species need disturbance and roadways to exist.**

I think that by trying to protect everything with blanket laws, more damage will be done to ecosystems in the long run. There are certain ecosystems and threatened species that need disturbance and roadways to exist. I would hate to see policies swing to such an extreme that we endanger more ecosystems. (Individual, Gulliver, MI - #A8362.30000)

## Negative Effects

### 570. Public Concern: The Forest Service should address the negative environmental impacts of activities/disturbance.

#### RESOURCE USE

Resource extraction proposals threaten to undermine ecosystem health. Presently the Chugach Alaska Corporation is pursuing two major projects that stand to compromise the health of the Delta—the road to their timber inholdings in the Bering Coal Fields and plans to explore oil and gas with Cassandra Energy Corporation in the Katalla region. Both projects will have substantial long-term impacts, especially a road system that would incur more access to fish, wildlife and habitat in the wild eastern part of the Delta wetlands. (Organization, Anchorage, AK - #A23038.50100)

Local citizens who reside close to National forest lands have long been influential in supporting extractive uses of Federal lands because of the local economic benefits (in the form of jobs) resulting from such uses. Historically the environmental consequences of such uses were often inadequately considered or ignored outright. (Individual, Columbus, OH - #A41.15111)

#### MECHANICAL FOREST HEALTH TREATMENTS

DellaSala and Frost document the best available science that determines that even when they are carefully conducted, mechanical thinning treatments can result in numerous adverse environmental impacts, including:

Soil damage through increased erosion, compaction, and loss of duff/litter layer (Harvey et al. 1994, Meurisse and Geist 1994).

Increased tree mortality of residual/retained trees due to pathogens and mechanical damage to boles and roots (Hagle and Schmitz 1993, Filip 1994).

Increased sediment and siltation that is harmful to fish habitat and other aquatic species (Beschta 1978, Grant and Wolff 1991).

Increased levels of fine fuels and short-term fire hazard (Fahnestock 1968, Weatherspoon 1996, Wilson and Dell 1971, Huff et al. 1995).

Dependence on roads, which result in numerous long-term adverse effects (Henjum et al. 1994, Megahan et al. 1994).

Reduced habitat quality for sensitive, rare, threatened and endangered species associated with cool, moist microsites or closed canopy forests (FEMAT 1993, Thomas et al. 1993).

Given the potential for serious adverse impacts from mechanical thinning treatments in addition to the adverse effects of roads, such treatments should be restricted to previously roaded areas that are also the sites most degraded and in need of restoration. It just makes no sense to build roads to facilitate road-dependent fuels treatments in the name of “conservation,” “restoration,” or “protection.” (Organization, Eugene, OR - #A21798.50000)

#### OFF-ROAD VEHICLES AND LOGGING EQUIPMENT

Areas adjacent to roads also tend to receive more off-road use (camping, firewood gathering) which in heavily used areas can compact soil or damage root systems causing physiological stress. Chemical and road salt can also damage trees. In dry forests with lots of traffic and dirt roads, excessive dust can also stress trees and other vegetation. Soil compaction decreases water absorption and can damage roots of grasses, forbs, shrubs and trees. Off-road vehicles, or heavy logging equipment use, during wet conditions is especially damaging and compaction and loss of soil structure can occur with a single vehicle. (Individual, Las Vegas, NV - #A5694.30100)

#### ROADS AND MINES

I have seen the beauty, the diversity of plant life and the wonder of the animal life in these areas. I have also seen the damage and destruction caused by roads (intended or not) and by mines (often created by a few individuals). The destruction is not just to the immediate area, but surrounding areas as it affects

water in the area—both its purity and the way it flows. It affects the plants destroying many and often allowing non-native plants to get a foot hold. It affects the animals by creating artificial separations of the lands and always the danger of maiming and death by being hit by vehicles and also by poisoning the soil and water that provides food and water for the animals. (Individual, Fillmore, UT - #A7847.30100)

#### DRILLING

Considering the continued leaching of oil from the Katalla fields into Delta waters, no doubt leaving toxic impacts that will only be exacerbated by proposals of renewed drilling and heavy logging in the Delta's uplands, this plan should be declined on the basis of impacts to the adjacent public lands. It is ACE's understanding that the Forest Service has never taken an inventory of "orphan" wells at Katalla, much less tested for the presence of toxins in anadromous streams in the area (conversations with Forest Service staff). (Organization, Anchorage, AK - #A23038.51300)

#### EFFECTS OF ROAD BUILDING ON AREAS ADJACENT TO ROADLESS AREAS

The Forest Service should consider the natural resources adjacent to their roadless areas and how road building might adversely impact them—i.e. protecting salmon spawning reaches from road accidents (tanker spills) and weather phenomena such as floods and fires. It should also consider the steepness of terrain—and in the case of a roaded system already underway to facilitate logging, which despite their best science in the planning process, begins to fail (landslide). (Individual, Craig, AK - #A778.50000)

#### FIRE

In **THE BIG BURN, The Northwest's Great Forest Fire of 1910** an account based on letters, newspaper accounts of the day and actual photographs, by Don Miller and Stan Cohen (Library of Congress catalog card no. 78-51507, ISBN 0-933126-04-2) there is this first hand account in a letter:

*"Men who quenched their thirst from small streams immediately became deathly sick. The clear, pure water running through miles of ashes had become a strong, alkaline solution, polluted by dead fish, killed by the lye".* (pg. 18)

History has probably repeated that many times. In the 1992 the Tanner Gulch Fire in northeastern Oregon, a sluice-out in the upper tributary of the Grande Ronde River resulted in total fish kill for 36 miles downstream in this prime salmon spawning river.

Fire does not protect watersheds, and much of the road destruction (called obliteration) puts tons of silt into streams, both destructive to fisheries and water quality. Modern silviculture can protect watersheds by reducing fire intensity, provide money, machines and expertise to maintain roads and thus reduce the potential for culvert failures, timber for jobs and the local and national economy. (Business, Kalispell, MT - #A29034.30300)

Some of these environmentalists are concerned about the "protection" from erosion from these areas, as well as from road in the forest. From 39 years of flying the Helena National Forest and its surroundings, I can tell you that erosion from our large stand replacing fires, including the let-burn fires advocated by environmental groups, is comparatively like a dump truck load compared to a shovelful of erosion from a similar sized harvest areas. (Individual, East Helena, MT - #A20422.15121)

Years of federal mismanagement to appease environmental interests (mainly, refusing to cut or clear any trees at all) has left the national forests in a state where overcrowded and dead and dying trees have created a disastrous and precarious situation. Trees and debris have created fuel ladders that threaten even healthy trees (that is, an older, healthy forest can withstand and survive a fire if the fire merely clears low-lying brush and grasses but leaves the crowns of larger trees intact.) But the same is not true when dead and dying trees are not cleared. Fire that would normally stay close to the ground can "climb" up these trees and reach the crowns of healthy trees, consuming them. Second, fires that burn too hot can leave land barren by destroying the organic materials necessary for forest regeneration. Finally, when the fuel loads are too high, fires are hard or impossible to control. These fires don't just burn out they rage so hot and so large that they can leap across vast expanses of land and burn whole landscapes. For all the direct costs of such fires, (lost forests, evacuated communities, lost houses,) there is a tremendous cost on our environment. Burning trees release tremendous amounts of toxins and

particulate matter into the air, and the smoke and quality of communities hundreds of miles away. The fires destroy habitat of wildlife, including the habitats of threatened and endangered species. Forest fires can create unstable soil conditions, leading to mudslides and other sediment runoff that affect our streams and rivers, and, ultimately the coast. (Individual, West Point, UT - #A5415.30430)

### PRESCRIBED FIRE

Prescribed Natural Fires—Good or Bad?

Environmentalists within and outside of the Forest Service are intensifying their efforts to increase the amounts of prescribed natural fire on public lands.

Environmental groups believe that fires started by lightning should be allowed to burn. Present policy permits this wilderness areas, national parks, and other areas including a large portion of the Elkhorn Mountains included in such categories as Wildlife Management Areas.

Experience over the past twelve years has shown that this “let burn policy” is a disaster for the environment, for receptionists, and for the general public.

The Canyon Creek Fire northwest of Lincoln in 1988, burned 246,000 acres, including 40,574 acres of private land, and 9,166 acres of state land. Pasture land, power and telephone lines, fence lines and some outbuildings were destroyed. The Forest Service disclaimed any responsibility, and it was left to Congress to reimburse the private owners for their losses. This same scenario occurred in Yellowstone Park in 1988, and has been replayed in many other areas since. As more time passes, the public memory of these destructive fires fades, and re-introduction of these policies becomes more easily accepted.

The environmentalists want to commit even more of our dwindling outdoors to additional acreage to these let-burn areas. Unfortunately, wildfires have a nasty habit of straying outside the boundaries prescribed for them by the Forest Service. If you have a home in the woods, how would you feel if one of these fires refused to stay inside the Forest Service boundary and burned your buildings and property? You could also expect the federal agency to disclaim any liability for your losses.

Contrary to what the Forest Service would like you to believe, the effects of uncontrolled wildfires on the natural environment are not entirely beneficial. Erosion associated with these super hot fires is unparalleled with other means of eliminating these excess fuels. Organic material which would aid in regrowth of new forests is mostly destroyed, and the ashes blown away by the wind. The carnage of small animals burned in these fires is beyond belief. And of course, huge wildfires certainly contribute their fair share of carbon dioxide and other pollutants to the greenhouse effect and global warming. (Individual, East Helena, MT - #A20422.30400)

## Water Quality

### Summary

**General Comments** – A number of respondents comment on water quality. People ask the Forest Service to protect roadless areas in order to protect water quality, to protect against flooding and landslides, and to act as biological defenses against pollution. Some comment particularly that roaded access be maintained to water resources. Some respondents assert that access to water sources is necessary for food resources or to protect the sources from sedimentation. Others state that road access should not be closed because roads and trails can be hydrologically disconnected from streams. Others comment on the effects of wilderness designations and timber removal practices on water quality. One individual suggests that good logging practices can ensure good water quality. On the other hand, some suggest that further land protections, such as roadless or wilderness designations or buffer zones, should be considered by the Forest Service to protect water quality.

**Watershed Health** – A number of respondents comment on watershed health. Some suggest that the Forest Service should adequately address watershed protection and ask that the effects of certain activities, such as road construction and timber removal, also be addressed. Others

request that the Forest Service protect roadless areas to preserve watershed health and to provide for irrigation. One individual asks that the Forest Service assess watershed health from a ridgetop-to-ridgetop perspective in order for “aquatic and vegetative values [to] be applied in a balanced manner.” Others comment that land designations may have a negative impact on watershed management access. Some state, further, that seems to be no inherent watershed benefit associated with roadless conservation.

**Water Quantity** – Respondents offer a variety of different comments on water quantity. Some comment that the Forest Service should increase logging to increase water quantity and state that roadless designations would “limit treatment to increase water production in the future.” Others assert that increased logging will not increase water quantity. These respondents believe that undue timber removal is detrimental to the environment, with no redeeming benefits.

### *Water Quality General*

#### **571. Public Concern: The Forest Service should protect roadless areas.**

##### **TO PROTECT WATER QUALITY**

If we do not pass this Rule, we will be destroying Water quality—for drinking and for swimming and for wildlife . . . etc. If we log the forests, we have less clean water, and we destroy living area and water for (rarer everyday) wildlife. There are a million other reasons for not destroying the forests. I think this (water and wildlife) is the most crucial. (Individual, Austin, TX - #A21704.51340)

##### **TO PROTECT AGAINST FLOODING AND LANDSLIDES**

These unlogged and unroaded areas protect private property from landslides and flood damage. (Individual, Santa Monica, CA - #A1715.45000)

Millions of dollars in damages can be caused by severe flooding. Roadless and unlogged watersheds could help to mitigate the severity of the floods and thus save millions of dollars and a lot of human suffering. This may be especially important if we experience climate change. (Individual, Las Vegas, NV - #A5694.51330)

##### **TO PROVIDE BASELINE AQUATIC DATA**

I am a professional aquatic ecologist, involved in a quantitative assessment of all the rivers and streams in the 12 conterminous western states. Preliminary results indicate that most western waters are impaired and that few catchments or reaches remain that can serve for determining reference conditions against which to compare the others. We often must use historical data. Similar conclusions have been reached in qualitative assessments by federal ecologists and independent scientists. Therefore, based on the best available science, it seems foolish to continue to destroy forests for short term, small scale economic gains to a few in the face of long term and broad scale ecological deterioration with impacts on many current and future citizens. (Individual, Corvallis, OR - #A7998.50300)

##### **TO ACT AS BIOLOGICAL DEFENSES AGAINST POLLUTION**

I believe that full and immediate protection for all roadless areas is important because it reduces human impacts on vital ecological areas and protects our drinking water sources from the risks associated with human contact. There are risks now that we did not know about fifteen years ago, like cryptosporidium, and although treatment plants are highly efficient, we know they cannot remove everything. With the continuing growth in Colorado, the risks to our drinking water are only going to increase unless we have the vision now to protect our water sources. (Individual, Longmont, CO - #A7167.51342)

**572. Public Concern: The Forest Service should adequately assess the true value of water on National Forest System lands.**

An assessment of the marginal value of water on National Forest lands is more than \$3.7 billion per year. This does not include the value of maintaining fish species, many other recreation values, nor the savings to municipalities that have reduced filtration costs because water from National Forests is so clean. It also does not account for the aesthetic rewards to visitors of a day spent by a cold, clear stream. (Organization, Missoula, MT - #A21359.51000)

**573. Public Concern: The Forest Service should recognize that water is necessary for food resources.**

What do these “enviros” eat? Grass? Worms? I guess they don’t eat regular meat because they don’t want the farmers to have water for crops that feed the beef, hogs, and chickens; also, there goes the fruit trees and the bread for the table . . . and what about the displaced MINORITY workers from Mexico? (Individual, Mazama, WA - #A757.51310)

Our Wenatchee Valley is the apple Capitol of the World. All of the irrigation water for this multi-billion dollar industry comes out of Wilderness and roadless Areas. Our local economy depends on these naturally functioning wild forest watersheds. The Wenatchee River Watershed watered by the above named Roadless Areas is one of the few remaining unharmed septums where wild salmon spawn. The White River, whose sole watershed is Wilderness and roadless area, produces half the wild Sockeye Salmon in the Pacific Northwest. (Individual, Peshastin, WA - #A22973.51300)

**574. Public Concern: The Forest Service should address the effects of wilderness designation on water quality.**

The enclosed letter that accompanied the 3 page EPA letter included starts with general comments, under which is 1. Water quality. The following paragraph is taken from page 1 of the enclosure. “The 1700 watersheds of the National Forests provide the preponderance of high quality water supplies for the western states, and many eastern areas as well. Undisturbed forest areas are vitally important in maintaining adequate oxygen and nutrient balances in aquatic systems, and also provide pristine streams of low natural turbidity for the enhancement of aquatic life. EPA is concerned that supplies of high quality water be available throughout the Nation. Our responsibilities under the Federal Water Pollution Control Act Amendments of 1972 further stress the goal that the Nation’s waters be available for the full range of **beneficial uses**, including recreation and the maintenance and enhancement of all forms of aquatic life.” (Emphasis added) On page 2 of the enclosure letter EPA also had the following concerns. “All evaluations of areas that are qualified under the Wilderness Act of 1964 should be conducted with full regard to the potential impacts on water quality. The draft environmental statement for the Roadless and Undeveloped areas contain severe shortcomings, in these areas, and we feel there exists the potential for extensive water quality degradation if Roadless Areas are not allowed the benefit of more detailed study prior to selection as candidates for the Wilderness System. (Organization, Coeur d’Alene, ID - #A13314.51340)

**575. Public Concern: The Forest Service should allow roaded access to water resources.****TO PROTECT WATER RESOURCES FROM NATURALLY OCCURRING SEDIMENTATION**

While roads may and do contribute to sedimentation of aquatic resources, design can minimize and even eliminate this concern. Roads can also allow access to water resources that require protection from naturally-occurring forms of sedimentation, and from catastrophic sedimentation sources such as fire and landslides. (Individual, Tendoy, ID - #A27508.30200)

**576. Public Concern: The Forest Service should not use the risk of sedimentation as justification for motorized recreation and access closures.**

**BECAUSE ROADS AND TRAILS CAN EASILY BE HYDROLOGICALLY DISCONNECTED FROM STREAMS**

The Forest Service Stream Systems Technology Center has found, in a paper published in the July 2000 issue of Stream Notes, that roads and trails can easily be hydrologically disconnected from streams. Therefore, the sedimentation concerns can be easily mitigated and must not be used as a reason to justify motorized recreation and access closures except in significant cases that cannot be adequately mitigated. (Organization, Helena, MT - #A13226.51340)

**577. Public Concern: The Forest Service should recognize that good timber removal practices can ensure good water quality.**

Water quality: good logging practices can ensure good water quality. Large wildfires tend to follow drainages and can lead to catastrophic destruction of water quality. (Individual, McCall, ID - #A29305.51000)

**578. Public Concern: The Forest Service should use buffer zones to protect water quality.**

The use of forests as watersheds should be elevated in importance. Logging, when done, should be accompanied by a large deposit to compensate and clean-up streams that silt-up after logging. Buffers should be sufficiently wide to guarantee no increase in water temperature from the loss of shade, as well as to guarantee no silting after the first heavy rain. (Individual, Olympia, WA - #A441.51300)

**579. Public Concern: The Forest Service should explain the reason grazing and timber removal are believed to pollute water more than wild fire.**

I read in the local newspaper that the runoff from the burned areas were polluting the streams and required the removal of endangered Gila trout. This occurred while logging and grazing are being restricted because they pollute. Why is pollution from forest fires good while any other use of the forest that may result in pollution bad? (Individual, Silver City, NM - #A1139.30100)

### *Watershed Health*

**580. Public Concern: The Forest Service should adequately address watershed protection.**

I find it strange that you ask no questions on the issue of watershed protection, which the earlier Congressional records clearly addressed. As late as 1990, scientists were still discussing the numerous benefits from our old growth ecosystems on America's soils and waterways. For example, Time Magazine observed, "The ancient growth acts as a giant filtration system, preventing run off of water and soil that would swell streams and rivers and threaten fish spawning areas and water quality with excessive sedimentation" (n. p., June, 25, 1990). (Individual, Melvindale, MI - #A30286.51300)

**AS MANDATED BY THE ORGANIC ACT**

As provided by the Roadless Rule, the appropriate role for local forest planning on National Forests is to provide Watershed Protection (Organic Act of 1897) [It is] THE SINGLE MOST IMPORTANT CALLING OF THE US FOREST SERVICE. (Individual, No Address - #A3079.20204)

**581. Public Concern: The Forest Service should assess watershed health from a ridgetop-to-ridgetop perspective.**

Aquatic and vegetative values must be applied in a balanced manner. The health of forest watersheds and ecosystems must be assessed and treated from a "ridgetop to ridgetop" perspective. The "ridgetop to ridgetop" perspective should apply to a forest's overall health status and any necessary restoration.

Inventoried roadless area creation should not interfere with the restoration of watershed or ecosystem health. (Organization, Moscow, ID - #A15318.50000)

**582. Public Concern: The Forest Service should address the effects of certain activities on watersheds.**

**ROADS**

Environmental characteristics that should have the highest level of attention when evaluating roadless areas should be related to watershed areas and possible erosion that could occur if a road is developed or not maintained. If roads do exist in sensitive areas, careful consideration should be given to either improving those roads or alleviate the negative environmental impacts and or to remove the road and relocate it elsewhere if necessary. (Business, Haslett, MI - #A4861.50000)

Roads interfere with the movement of organisms and energy across the landscape. One of the most severe impacts is to riparian areas: Culverts and roadfills bisect stream corridors, isolating communities of fish, amphibians and mammals, they block storm flows, create dam-break floods, and prevent the movement of wood debris. These impacts are huge and we have way too many roads already. Let us keep some areas intact. The Forest Service cannot keep up with the maintenance and abandonment of the roads it already has, why build more? (Individual, Olympia, WA - #A510.51000)

Roads often have devastating impacts on water quality and fish habitat by increasing landslides, erosion, and siltation of streams. Roads also fragment forests and degrade or eliminate habitat for species that depend on remote landscapes, such as grizzly bears, wolves, and other large, wide-ranging predators (Trombulak and Frissel 2000). The habitat fragmentation, erosion, and sediment transport associated with roads is a major threat to the integrity of our forest ecosystems. The impacts on watersheds of "pulse" events created by wildfire and naturally occurring erosion are very limited in duration and are the very conditions with which aquatic organisms evolved. Forest road networks, in contrast, are a chronic source of sediment pollution to the watersheds. They also cause, along with all the forest canopy openings created by logging, high peak flow events from spring runoff and rain-on-snow events that destabilize the streambeds and streambanks, fill pool habitat with bedload sediments, and increase fine sediment input - all further damaging the aquatic environment. (Organization, Missoula, MT - #A613.54000)

**SELECTIVE TIMBER REMOVAL**

This rapacious, greedy appetite must be stopped. We know that it is in loggers interest to cut the best trees in a given watershed and move on. They take the largest trees that are easiest to reach to maximize profits. Unfortunately, the harmful effects to the watersheds are spread throughout a much broader area than raw numbers would indicate. The best trees are located in lower areas that are next to streams that define major watersheds. Streams, therefore, take the brunt of this industry and although areas are only partially logged the harmful effects are felt on a disproportionate amount of the watersheds. Why will you not acknowledge this? (Director, Tribal Resources, Hoonah, AK - #A3024.51340)

**583. Public Concern: The Forest Service should manage vegetation for watershed health.**

All forestland should be managed as a watershed. The spacing of all vegetation must favor water production. This vegetation must be healthy, vigorous and all age classes must be in balance. The over-mature must be removed so that the balance is maintained. This spacing must be maintained from the top of the mountain to the valley and from the ridge top to the swale. (Individual, Klamath Falls, OR - #A8809.51000)

**584. Public Concern: The Forest Service should protect roadless areas.****TO PRESERVE WATERSHED HEALTH**

Undeveloped areas have been spared the increased erosion associated with roadbuilding, logging, and other forms of development, which causes damaging sedimentation of streams and rivers. Roadless areas harbor some of the country's most intact aquatic ecosystems and contribute to the recovery of degraded aquatic populations. The clean flows they provide are important not only to aquatic organisms, but also as sources of drinking water (42 million acres of national forest land are classified as municipal watersheds). Roadless areas help regulate stream flows and reduce flood threats, absorbing excess waters during storm events and releasing them slowly over time. (Organization, Missoula, MT - #A613.51000)

Roadless areas help recharge aquifers and are often in the headwaters of municipal watersheds, providing the cleanest water and resulting in lower water treatment costs for local residents. In fact, 80% of our nation's water supply comes from national forests, with roadless areas producing the purest of that water. (Individual, Santa Monica, CA - #A1715.51000)

We need protected, untouched forest areas to help retain and purify our water supply. Undisturbed forest acts like a sponge, releasing water slowly into rivers. Logging roads cause horrible erosion which ruins fisheries, and clogs waterways with silt. (Individual, Roswell, GA - #A1467.51200)

The Forest Service did a thorough job of identifying the characteristics, environmental values, social and economic concerns when it evaluated IRA's in 1972 (RARE I), 1979 (RARE II), and additional reviews conducted since then. Watershed protection is arguably the most important value in social and economic terms, but is inextricably woven with overall ecosystem health. Although IRAs comprise less than 2% of land in the continental US, they provide about 14% of the nation's total water flow, and 33% of water in the West. (Individual, Vista, CA - #A4838.45100)

**TO PROTECT WATERSHEDS IN CALIFORNIA**

The last 30% of our wild national forests - with almost 4.5 million acres in California - provides a quality water source. This is especially critical in a state that has undergone water rationing several times in the last thirty years. (Individual, San Pablo, CA - #A5005.51320)

Here in California, WATERSHED PROTECTION is a very important issue and we must protect our water supply. It does not rain here in the summer, as I am sure you know, and we must not log in the roadless areas. (Individual, Santa Cruz, CA - #A908.51310)

**TO PROVIDE FOR IRRIGATION**

The Forest Service role in working with the states, tribes and communities should be in protecting the watershed for clean drinking water, wildlife, recreation, and irrigation. (Individual, Boise, ID - #A5731.50000)

Where I live we need the watershed to feed the streams, brooks, springs, and rivers which is for the various sports, hydro electric, and irrigation as well as drinking water and other commercial endeavors. (Individual, Great Falls, MT - #A5914.50000)

**TO PROTECT COMMUNITY WATER SOURCES**

Every community of any size that is adjacent to National Forest lands depends on surface water from those lands for its drinking water. Any ground disturbance, and particularly roadbuilding, loads sediment into the water, making it vulnerable to contamination from pathogens and more difficult to purify for potable use. As a 20-year water treatment engineer I can testify to the very substantial public health benefit of clean water from roadless lands. (Individual, Bozeman, MT - #A6189.51342)

**585. Public Concern: The Wilderness Act should be revised to protect drinking water.**

The Wilderness Act must be revised if we are going to have enough drinking water—2030 and beyond. (Individual, Klamath Falls, OR - #A8809.20206)

**586. Public Concern: The Forest Service should ensure that land designations do not interfere with management access to watersheds.**

Roadless areas by and large are key watersheds, which provide snowpack retention and habitat and protect water quality. Nevertheless, to designate these areas as wilderness would foreclose critical management activities that may be needed to protect the most important roles key watersheds serve. If specific designation of a roadless area is appropriate, it should be made under the local forest plan. (Association, No Address - #A21242.51300)

In the west, much of our local watershed is in our National Forests. It is imperative that roads be maintained, and access be allowed to these vital areas. Our very lives could depend on it. (Individual, Manti, UT - #A27830.51300)

**587. Public Concern: The Forest Service should recognize that there is no inherent watershed benefit associated with roadless area conservation.**

Watershed protection values have been misstated. The Weeks Law established eastern National Forests to produce wood and water. These are compatible uses. While all human uses have a risk of pollution, research has repeatedly shown normal harvesting does not impair water uses. Forestry is consistently ranked as one of the lowest sources of pollution by the US EPA.

There were many inaccurate statements in the May Draft EIS. Roadless conservation does not guarantee high quality water. Many natural conditions such as wetlands and acid geologic formations lower water quality. Nationally, grazing probably causes more pollution than roads. Based on my monitoring, recreation causes the most pollution in the White Mountain national Forest. The pathogens associated with backcountry waste disposal are a greater risk than timber harvesting. Roadless conservation does not prevent landslides. A study inventoried over 500 landslides in the White Mountain National Forest and concluded they were all due to natural events. Normal harvesting does not cause floods. On the other hand, studies show long term forest preservation reduces stream flow and increases nutrient release. It should be made clear there is no inherent watershed benefit associated with roadless conservation. (Individual, No Address - #A17292.45000)

**588. Public Concern: The Forest Service should identify critical areas of key watersheds.**

Critical areas of key watersheds also need to be identified and restored through road removal and other restoration efforts. (Professional Society, Missoula, MT - #A17054.45000)

## *Water Quantity*

**589. Public Concern: The Forest Service should increase logging to increase water quantity.**

Not enough emphasis has been placed on the importance of water in discussions of roadless areas. Whether or not to build roads or log has been front and center, but the importance of water, especially here in the West, has been ignored. The quantity of water delivered at the Forest boundary can be increased by certain silvicultural practices, including building roads and removing trees. (As in the Dead Horse Experiment on the Caribou National Forest, which demonstrates water yield could be increased tremendously.) National Forest lands that should be treated to increase water production are the areas that receive the most snow. These generally are the same areas currently designated as roadless. Setting

these aside would limit treatment to increase water production in the future. (Individual, Mapleton, UT - #A6978.51000)

In our region, it is evident by the overgrown condition of the forests that a controlled and environmentally sound timber harvest program is needed to accomplish the two main purposes of the USFS. In recent years, timber production in the region has virtually ceased resulting in deteriorating watersheds due to transpiration of water from too many trees. In some places, there are in excess of 1000 stems per acre. The Gila Wilderness provides a good example of the degradation of watersheds due to a policy of no timber harvest. Excessive tree density in this area has resulted in the diminution of grasses resulting in the accelerated runoff of rain and snowmelt with accompanying erosion. Creek beds that were small and had water in them much of the year are now fifty feet wide due to excessive runoff and only contain water during a storm. Does the Roadless Initiative seek to extend this kind of non-management that has resulted in an ecological disaster? (Individual, Ruidoso, NM - #A17775.51300)

### **590. Public Concern: The Forest Service should recognize that increasing logging will not increase water quantity.**

It is obvious that undue timbering, particularly on steep slopes that occur in the national forests, is very destructive of natural resources. It causes a loss of topsoil that took years to create and is difficult to replace. It silts up our streams with adverse effects on fish and other aquatic organisms, both by clogging their respiratory tracts and covering up the fertilized eggs needed for reproduction. It further silts up water used by around one-third of our citizens for their drinking water supplies, thus making water purification more expensive to a host of municipalities that do not have extra funds to spend. This is also disadvantageous to industries that use water from our watercourses. [Footnote 1: Strangely enough, it was recently contended, in litigation involving the Medicine Bow National Forest in Wyoming, that increased logging would “improve” a watershed by increasing water runoff. That claim was, however, rejected by the Tenth Circuit Court of Appeals, which sustained protection of the national forest against that attack.] (Organization, Birmingham, AL - #A21582.51300)

## **Air Quality**

### **Summary**

**General Comments** – Some respondents state there is a need to preserve and improve air quality. Common comments are that the Forest Service should protect air quality by strengthening the Clean Air Act (see also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Clean Air Act*), prohibiting road construction, and protecting roadless areas.

Some assert that the preservation of forests is important in creating sinks for the absorption of greenhouse gas emissions, particularly carbon dioxide. One individual points out, though, that protecting roadless areas will not increase carbon sink or reduce fires.

Others suggest that protecting roadless areas will counteract global warming and reduce the threat of asthma. One respondent states healthy forests maintain current radiation balance, which if thrown off balance would effect the earth both meteorologically and biologically.

**Adequacy of Analysis** – A few individuals ask the Forest Service to provide data regarding airborne contaminants from wildfire. One comments that the Forest Service does not seem to provide data on human health hazards emanating from the airborne contaminants from these wildfires, “the degradation of air in Class 1 air zones from these and other fires that are left to burn “naturally,” the transformation of growing forests which are carbon sinks into eventual over mature forests which are carbon emitters.”

**Effects of Activities/Disturbance on Air Quality** – Some respondents suggest that the Forest Service should plant trees to counter the effects of greenhouse gases and to absorb industrial air pollution; and should consider the contribution of old, rotten trees to greenhouse gases. Several believe building and maintain dirt roads causes air pollution through the dust that occurs. Another respondent suggests that mature trees and trees at risk of falling should be removed in order to improve air quality because of the excess carbon put back into the atmosphere. Others ask the Forest Service to address the impacts of motorized activity on air quality, and to carry out controlled burns in order to reduce air pollution.

### *Air Quality General*

#### **591. Public Concern: The Forest Service should define air quality as a key objective.**

Everyone will rally around the improved air quality theme, but it is your obligation to collect and disseminate the process to achieve this. Unless your request for input defines air quality as a key objective, the answers to your survey will be less than true. (Business, Vancouver, WA - #A670.52100)

#### **592. Public Concern: The Forest Service should protect air quality.**

##### **BY STRENGTHENING THE CLEAN AIR ACT**

One of the most important forest health problems is air pollution, which is greatly affecting the health and vigor of our eastern forests. I would encourage the FS to support strengthening the Clean Air Act and Clean Air Act regulations. A pro-active management approach to air pollution issues in roadless areas is needed. (Individual, Roanoke, VA - #A23081.30100)

##### **BY PROHIBITING ROAD CONSTRUCTION**

More roads add to more dust to create more air pollution. (Individual, Kalispell, MT - #A16734.52120)

#### **593. Public Concern: The Forest Service should protect roadless areas.**

##### **TO PRESERVE AIR QUALITY**

How are we going to breathe without the oxygen that the trees and other plants give off? If the world keeps on destroying our environment, pretty soon our planet will be an empty mass like Mars, with nothing but dust. (Individual, Allentown, PA - #A1468.50000)

Our heritage as Americans is more than our political system, more than our social environment, our civil liberties. The greatest heritage is the land itself, the beauty of Mother Nature all around us. What would life be like without forests and untainted streams and rivers? We are yet still animals, we are Mammals. Does the Bush administration feel that we can survive without our partners in respiration? Our very breath gives life to the trees in this world and they then in exchange give us ours. (Individual, Dewittville, NY - #A1500.50000)

##### **TO CREATE SINKS FOR THE ABSORPTION OF GREENHOUSE GAS EMISSIONS**

Forests contribute to the prevention of carbon dioxide build-up, a factor of major importance in our future. (Individual, Metuchan, NJ - #A507.52130)

The preservation of forests is especially important in creating sinks for the absorption of greenhouse gas emissions, particularly carbon dioxide. (Individual, Evanston, IL - #A991.52130)

##### **TO COUNTERACT GLOBAL WARMING**

Global Warming is in full-swing. I believe protecting these roadless areas is best for future generations of Americans and the world, and all of humanity. (Individual, Lafayette, CO - #A807.50400)

Integrity of our forests is vital to the well being of all the creatures on the globe. Roads will facilitate the increase of forest loss by epidemics caused by introduction of organisms lethal to the trees growing there brought by equipment, personnel, visitors from other places. There are hundreds of examples of loss of forests throughout the world due to introduction of exotic pests. Each time these forest deaths increase the atmospheric CO<sub>2</sub>, and decrease atmospheric O<sub>2</sub>. Biomass accumulation through forests killed by diseases where no resistance has been established is a significant cause of global warming. Opening roads in forests is the highway for introduction of exotic pests. Surely this must be also considered in the details of the Kyoto Accords. (Individual, Sausalito, CA - #A1344.50400)

Alaska is facing, perhaps more than any other state, the threats of global climate change. The residents of Shishmarof can testify to that truth, as well as scientists at the University of Fairbanks and around the world. Forests are valuable carbon dioxide recyclers and contribute to reductions of CO<sub>2</sub> in the atmosphere. (Individual, Chugiak, AK - #A261.50410)

#### **TO REDUCE THE THREAT OF ASTHMA**

Forests provide oxygen for the air we breathe. We are such hypocrites to bemoan the fact that the rain forests are being destroyed along with their capacity for producing breathable air, when we have little respect for the clean air our own trees provide. The percentage of increase for asthma in the United States in the last ten years is incredibly high. Could there be a correlation between our declining breathable air from fewer trees cleaning up the air pollution and the rampant rise in asthma? Asthma is a killer and is nothing to ignore! (Individual, Gainesville, FL - #A222.52130)

Trees provide oxygen. If we have no trees watch asthma cases rise. Where will nature go? (Individual, Bettendorf, IA - #A4356.52130)

#### **594. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule will not increase carbon sequestration.**

Please revise the Rule!!! It will not protect the forest, increase carbon sink, reduce fires, or generally help forest health. (Individual, Piney View, WV - #A12597.10131)

#### **595. Public Concern: The Forest Service should protect forests to maintain the current radiation.**

Our forests are important [for] maintaining the current radiation balance and without them could upset the proper balance of incoming to outgoing radiation, which in turn will affect our Earth meteorologically and biologically. (Individual, Somerville, MA - #A42100.50400)

### *Adequacy of Analysis*

#### **596. Public Concern: The Forest Service should provide data regarding airborne contaminants from wildfire.**

The Forest Service has never provided definitive data on the real human health hazards emanating from the airborne contaminants from these wildfires, the degradation of air in Class 1 air zones from these and other fires that are left to burn "naturally", the transformation of growing forests which are carbon sinks into eventual over mature forests which are carbon emitters. (Individual, Seeley Lake, MT - #A8075.14100)

As a member of the Governor's Clean Air Committee here in Vermont, I am very concerned with the serious threat to our air quality posed by the millions of acres burned last summer and again this summer. The majority of our air pollution comes from outside Vermont. The jet stream and prevailing winds bring significant ash and other pollutants from the west, southwest and south to Vermont. This is contributory to our higher than normal incidence of respiratory disease. Some scientists have calculated that the pollution from the fires last summer exceeded the pollution of fossil fuel power plants by a

factor of greater than ten for the entire year. This is not acceptable when poor air quality is a serious health issue. Moreover, it seems likely that western fires are contributing to the reported pollution-related forest degradation in Vermont. (Individual, South Royalton, VT - #A13393.52110)

## *Effects of Activities/Disturbance on Air Quality*

### **597. Public Concern: The Forest Service should plant trees.**

#### **TO COUNTER THE EFFECTS OF GREENHOUSE GASES**

It is not only the tropical rain forests that need to be protected for the ecological health of this planet, but the last wild, roadless areas of our now National Forests. Carl Sagan in his last book . . . states that we need to plant additional trees to counter the greenhouse gasses we currently produce, equal to the area of the United States, today! (Individual, Santa Barbara, CA - #A4860.50410)

#### **TO ABSORB INDUSTRIAL AIR POLLUTION**

This should now be part of any forest or energy plan. The Nation needs to engage in greater reforestation and planting of trees which, in turn, will support our industrial base by absorbing the CO<sub>2</sub> it generates. Without the added trees, we shall clearly have greater problems ahead. The government could invest more funds into programs for planting trees, but how much more cost-effective is it to preserve those that we already have in the national forests? That will not cause any cash outlays! (Organization, Birmingham, AL - #A21582.50410)

### **598. Public Concern: The Forest Service should consider the contribution of old, rotten trees to greenhouse gases.**

When old trees fall over and start to rot, much of the absorbed carbon gets released back into the atmosphere. A well-managed growing forest is our best protection against greenhouse gases. (Association, South Hill, VA - #A17035.50410)

### **599. Public Concern: The Forest Service should remove mature trees and trees at risk of falling.**

#### **TO IMPROVE AIR QUALITY**

We can unite all opinions if we concentrate on air quality - a universal need. Fifteen years ago, a group of us including Audubon and Sierra members, plus foresters and conservationist decided to make personal tests on improving air quality as well as improving fish and wild life habitat - yet maintaining the desirable forest environment for our square mile forest and lake home site area. We have been removing mature and risk trees that would fall down, opening the canopy so sunlight could increase growth. After fifteen years we enjoyed an increase in wood fiber from 6,000,000 board feet to 9,000,000 board feet - a 50% increase in sequestration - converting carbon dioxide into wood fiber and releasing two molecules of oxygen for each molecule of carbon removed from the atmosphere. An adjacent area with restrictions and no personal access, was cruised with very little additional increment of growth. Converted to pounds of carbon dioxide - our area took 30,000 tons of CO<sub>2</sub> out of the air. This is two or three times as much as a nearby restricted area. We have asked the Department of Natural Resources of the State of Washington as well as Bureau of Land Management to see how we have maintained the forest environment as well as provided for fire control. There are more than 3,000 similar private forest ownership's, each of whom could improve air quality and fire control with no government or state subsidy. We can factor this with the air pollution from last season's forest fires. If only a percentage of these private ownership followed a similar plan the entire added CO<sub>2</sub> from the fires would be consumed and converted to usable fiber. Forests are the most important element to improving air quality and planting trees is only a first step. We need to improve the efficiency of our forests to make up for the continuing use of fossil fuels. We proved it can be done, and your foresters know it can be done if all people know the facts of air quality improvement. (Association, Vancouver, WA - #A279.52130)

## 600. Public Concern: The Forest Service should address impacts of motorized activity on air quality.

### VEHICLE EMISSIONS

I have seen it happen, moving to a pristine area full of wildlife and fruits. My Mom and I used to come out of the woods with gallons of wild berries, each day. Two years later, a highway is put through allowing access to diesel vehicles to another area. In one season, I have seen hundreds of thousands of frogs, toads, snakes, fox, wild berries, and fruit disappear, never to return. We are lucky to be able to pick a half cup of berries from the same bushes we had picked gallons from before. Diesel, snowmobile and auto fumes are bad to fragile systems. I have seen it myself. I don't need a study to tell me. (Individual, Antonito, CO - #A21454.60300)

### CONSTRUCTION EQUIPMENT

I have not even mentioned the vast amount of noise and air pollution from the construction equipment used to build these roads. (Individual, Radford, VA - #A9397.52100)

## 601. Public Concern: The Forest Service should carry out controlled burns.

### TO REDUCE AIR POLLUTION

This year as I was hiking with my wife, we saw an area that had burned just North of Troy, MT. The fires burned along the perimeter of an old blocked off logging road. I point that out to show that roads give us natural fire breaks that help prevent small fires from becoming big fires. We also saw evidence where fire fighters used the road to get to the fire quickly. Again, these roads are valuable in the effort to control wildfires. From a pollution standpoint, it is important to use every means necessary to keep wildfires small. The fires in Montana this year and last produced as much pollution for the environment as industry ever would in an entire year. I could only hope that all people would have to sit around breathing in the smoke from wildfires for a month or so every summer. Perhaps that would help change their minds. (Individual, Kalispell, MT - #A27110.30200)

## Soils

### Summary

**Soils General** – One individual urges the Forest Service to recognize the environmental importance of soil—”Man’s most important ‘natural resource’ is the soil!! The soil supports all lakes, rivers, vegetation (due to rainfall and weather), wildlife and man!”

**Adequacy of Analysis** – Another association suggests that the Forest Service develop a national interagency soil survey and inventory program with standardized monitoring methods in order to assess current and future health need, as well as impacts from various uses, including grazing. One respondent requests that the Forest Service address soil composition in individual forests rather than create blanket legislation for all areas.

**Effects of Activities/Disturbance on Soils** – Several respondents comment on the effects of activities on soil. They suggest that the Forest Service address the effects of timber removal on surface soils, the effects of logging and road building on erosion and landslides, and the effects of soil compaction. Others advise that biomass from habitat restoration work should be retained to provide nourishment for the soil.

## *Soils General*

### **602. Public Concern: The Forest Service should recognize the environmental importance of soil.**

Man's most important "natural resource" is the soil!! The soil supports all lakes, rivers, vegetation (due to rainfall and weather), wildlife and man! Let nature support itself, as it did before man tried to be the politically determining factor! (Individual, Coeur d'Alene, ID - #A16085.52200)

## *Adequacy of Analysis*

### **603. Public Concern: The Forest Service should develop a national interagency soil survey and inventory program with standardized monitoring methods.**

#### **TO BETTER ASSESS THE CURRENT AND FUTURE HEALTH OF THESE LANDS, AS WELL AS IMPACTS FROM VARIOUS USES**

With regard to roadless areas currently used for grazing, CCA supports a national interagency soil survey and inventory program and standardized monitoring methods to better assess the current and future health of these lands, as well as impacts from various uses, including grazing. (Association, Sacramento, CA - #A3681.30100)

### **604. Public Concern: The Forest Service should address soil composition in individual forests.**

Forest health must be addressed by treating each forest area as unique. Soil composition is quite varied; why introduce a blanket legislation to cover soils and vegetations existing in a large variety of substrates, climates, and latitudes? This is not based on good science. (Individual, Jackson, WY - #A29552.52200)

## *Effects of Activities/Disturbance on Soils*

### **605. Public Concern: The Forest Service should address the effects of activities on soil.**

#### **EFFECTS OF TIMBER REMOVAL ON SURFACE SOILS**

My studies of the effect disturbance (e.g., clear-cutting and other forms of timber harvest) has on forest surface soils suggest, at least for the North American forest types studied, a high potential for lasting damage that could have ecosystem-level impacts as a result of the disturbance. My studies have indicated highly significant losses of organic maternal and nutrient cations (e.g., K and Mg) from surface soils within three years post clear-cut. Similar findings have also been described for other forests (North American, European, and others). Immediate detrimental effects (within three years post clear-cut) have been observed for soil microbial communities, which could have lasting effects on the abilities of these soils to recycle nutrients for these ecosystems. Similar findings, although not quite as dramatic, have been found in areas where selective harvest techniques have been used (using heavy equipment). Of course one of the critical factors required for either clear-cutting or selective harvest using heavy equipment is the necessity of building roads into the site. Therein lies my concern with the Bush Administration's request to revisit the Roadless Area Conservation Rule approved by the Clinton Administration. (Professional Society, Hixson, TN - #A26223.52200)

#### **EFFECTS OF TIMBER LOGGING AND ROAD BUILDING ON EROSION AND LANDSLIDES**

. . . Oregon, most of the mudslides in the last five years are a direct result of clear-cuts and placement of logging roads on slopes too steep to support such roads. Obstruction of vital watersheds as a result of erosion from clear-cutting and logging roads has already caused irreparable damage. (Individual, No Address - #A3863.51341)

I am also very aware of the effect of road-building and tree-harvesting on areas down-hill when heavy rains occur. Citizens of our state have suffered loss of all they have in part because of destruction of natural areas for commercial gain. (Individual, Morgantown, WV - #A4000.51341)

These unlogged and unroaded areas also protect private property from landslides and flood damage. (Individual, Santa Monica, CA - #A1715.45000)

#### **EFFECTS OF SOIL COMPACTION**

Logging and roadbuilding compact soils, disturb or destroy organic layers, and cause high rates of soil erosion. Trees' access to nutrients and water is reduced because of restricted root growth in compacted soils, reduced water infiltration rates, and decreased oxygen and water available to root systems. Soil compaction also adversely impacts microorganism communities such as mycorrhizal fungi, which are important to many tree species in accessing nutrients. (Individual, Anchorage, AK - #A20934.52200)

#### **606. Public Concern: The Forest Service should retain biomass from habitat restoration.**

Appropriate habitat restoration work should, of course, be allowed, but the biomass from that work should not be removed from the forest, to supply wood or pulp or fiber for commercial interests. Instead it should be allowed to decompose or be burned in piles where it will nourish the soil, in places. (Organization, San Francisco, CA - #A11992.52220)

## **Scenery**

### **Summary**

A few people comment that the Forest Service should place greater value on scenic resources. One Organization asserts that the Roadless Rule would be the best way to preserve the scenic beauty in roadless areas. While others comment that the implementation of a national roadless rule would provide relief from what they see as unsightly even age management.

#### **607. Public Concern: The Forest Service should place greater value on scenic resources**

##### **BY COMPLETING VISUAL ASSESSMENTS OF ALL ROADLESS AREAS**

In a recent policy study evaluating the impact of federal laws on scenic conservation, Scenic America pointed out that NFMA and its accompanying regulations undervalues scenic resources. We strongly urge the Forest Service to complete visual resource assessments of all existing roadless areas. Furthermore, we believe that the Roadless Rule would provide the greatest possible protection for the scenic beauty in roadless areas. (Organization, Washington, DC - #A22098.45100)

#### **608. Public Concern: The Forest Service should implement a national roadless rule.**

##### **TO PROVIDE RELIEF FROM UNSIGHTLY CLEAR CUTS**

We need scenic, unroaded forest landscapes for relief from mountains with their tops cut off or their trees stripped. (Individual, Soddy Daisy, TN - #A15286.70310)

## **Wildlife**

### **Summary**

**General Comments** – Wildlife is a major issue to a number of respondents. A number of people believe that the protection of roadless areas will be beneficial to wildlife, amphibians, and

subsistence species by ensuring reproductive capability and providing wildlife corridors. Other respondents provide a number of suggestions on how the Forest Service should protect wildlife. These suggestions include actively managing roadless areas, allowing state fish and wildlife agencies to manage populations, allowing field research in roadless areas, and implementing the Theodore Roosevelt Conservation Alliance Square Deal Initiatives. On the other hand, some respondents comment that some land designations may restrict wildlife management and request that the Forest Service avoid making those designations. Others suggest that managing for individual members of species will have negative impacts over the long term. At the same time, a few respondents suggest that some wildlife management activities and restrictions are carried out to the detriment of humans, and assert that the Forest Service should value human life over wildlife and plant life.

**Species-Specific Considerations** – Some respondents comment about specific species. Several people request the protection of roadless areas for the sake of certain species such as brown bears, yellow-legged frogs, lynx, cutthroat trout, and butterflies. Some comment as well about the reintroduction of predator populations. Specifically, some state that “PREDATOR reintroduction and protection should be a management objective,” while others assert that “the reintroduction of coyotes, wolves, and bears to certain areas is upsetting the balance that was established with the people population increase.”

**Funding** – Respondents offer several comments regarding funding related to wildlife. One individual requests that the Forest Service more effectively utilize funds earmarked for the protection of wild horses. An organization responds that building roads in the Skagit River watershed would route funds away from salmon recovery efforts.

**Effects of Activities/Disturbance on Wildlife** – Some general comments regarding the effects of activities/disturbance on wildlife suggest that wildlife is not adversely impacted by certain activities. For example, some respondents assert that roads do not harm wildlife, including fish and the desert tortoise, nor do roads impede wildlife movement. People also suggest that vehicles do not disturb wildlife.

A number of respondents suggest that positive effects result from certain activities or disturbances. Some activities suggested to be beneficial to wildlife include timber removal such as thinning, dams and fish passage ladders, and ranch management. Some suggest that fire, disease, and insects are beneficial to bird species. One individual suggests that the Forest Service should provide retaining pools when installing culverts for the benefit of wildlife during the dry season.

A greater number of respondents, however, suggest a wide array of negative effects of specific activities and disturbances on wildlife. Writers advise the Forest Service to address the negative effects of roads on wildlife. Some suggest specifically that roads have negative effects on fish, suggesting that roads cause sedimentation, loss of spawning habitat, and facilitate the stocking of non-native species, overfishing, and disease transmission. Respondents also ask the Forest Service to address the negative effects of off-road vehicles, inadequate stream culverts, timber removal, hiking, and fire on wildlife. Some comment that the Forest Service should protect wildlife by closing roads or prohibiting all active management and resource use.

## Wildlife General

### 609. Public Concern: The Forest Service should protect roadless areas.

#### FOR WILDLIFE

I support the Roadless Area Conservation Rule JUST AS IT IS. Here are some reasons why:

Montana roadless lands provide some of the best hunting, camping, wildlife habitat, and trout waters left in our nation. These roadless areas sustain mountain streams that are the lifeblood of legendary trout waters and the source of drinking and irrigation water for many communities. In Montana traditional Western trails traverse areas without roads providing habitat for wolverine, mountain goat, bighorn sheep, elk, pine marten, lynx, and black and grizzly bear. These animals do not survive well when we build roads and interfere with their territory. When there are roads there is so much more human activity in their homes.

Only national protection will guarantee that Montana's wild national forest lands remain intact regardless of changing politics and personnel. The issues of inholdings, fire, floods, and forest health raised in the revision process are rightfully addressed by the existing policy. Montana's rugged roadless lands and traditions are a public land legacy, a priceless gift for our kids and all generations in an increasingly crowded and commercial world.

I live in the Gallatin Valley of Montana and it is becoming more and more crowded every year. The only places available to recreate are public lands unless one is wealthy enough to buy their own. The survival of the above mentioned wild animals is important to me. It gives me a big thrill to see some of this wild life occasionally. (Individual, Manhattan, MT - #A5633.10150)

#### FOR AMPHIBIANS

The Southern Appalachians, in particular, are home to a wide diversity of vascular and vertebrate species, some of which are endemic, some are found nowhere else on earth, and many are found nowhere else in North America in such concentration of species diversity. Many of these, especially amphibians, are dependent upon clean and clear-flowing water supplies which are provided by interior (roadless) area, but threatened by logging and roadbuilding and their associated siltation and stream degradation. (Organization, Bland, VA - #A17007.50500)

#### TO MAINTAIN HEALTHY FISHERIES

Protecting existing roadless areas makes sense both ecologically, economically and morally. As stewards of God's green earth, we have the duty to protect the natural environment for generations who are to come after us. Protecting the pristine, wild nature of these areas is economically beneficial as we allow sporting activities in these areas. Ecologically and biologically, roads should not be constructed in the existing roadless areas of our national forests and grasslands. These roads threaten vital trout and salmon which are a national treasure. (Individual, No Address - #A4575.10150)

Much of the remaining integrity of our fisheries relates directly to the absence of roadbuilding and management activities in our tiny percentage of remaining roadless areas. The Wild and Scenic Elk River, located in the Powers Ranger District of the Siskiyou National Forest, is a watershed of specific interest to me as a fisherman and frequent visitor. To maintain its exceptional water quality and its phenomenal Chinook salmon and steelhead fishery, it is absolutely crucial to fully protect the Copper Mountain Roadless Area, the proposed Copper Salmon Wilderness, and *all* presently unroaded areas of Elk River watershed. (Individual, No Address - #A27799.51000)

The Southern Appalachians, in particular, are home to a wide diversity of vascular and vertebrate species, some of which are endemic, some are found nowhere else on earth, and many are found nowhere else in North America in such concentration of species diversity. Many of these, especially amphibians, are dependant upon clean and clear-flowing water supplies which are provided by interior (roadless) areas, but threatened by logging and roadbuilding and their associated siltation and stream degradation. (Organization, Bland, VA - #A17007.50500)

Watershed purity here in the Tongass communities is essential for healthy salmon runs. The Salmon and other fisheries are essential to the economy of Southeast Alaska. Tree dumps, silt, runoff from logging roads and inadequate buffer zones to protect streams are in direct conflict with healthy ecosystems and healthy salmon runs. (Individual, Juneau, AK - #A30033.51000)

The general national road building prohibitions and limited exceptions contained in the Roadless Rule should be retained. At the local planning level, specific restrictions should apply to road-building, reconstruction, or off-road vehicle use in inventoried roadless areas that have watersheds containing aquatic diversity areas identified through regional, forest, or watershed assessments. (Organization, Eugene, OR - #A29717.51300)

#### **TO ENSURE REPRODUCTIVE CAPABILITY**

All of these creatures live in different ways, but all share at least one thing in common: they all live to produce. This is true for any organism. Every organism has means of reproduction. It was through the process of reproduction that organisms evolved into their present forms. Reproduction is vitally important. If a species as a whole were to lose its ability to reproduce, then that species would disappear from this earth NEVER TO APPEAR AGAIN! That is why reproduction is so important. In order for reproduction to occur, a number of things are necessary. Above all else, most important to reproduction is food and water; an organism can't reproduce if it is not adequately nourished and therefore unhealthy. Secondly and equally important to reproduction is the organism's ability to find a home. I define the word 'home' as the place where an organism finds food and water and also looks for a mate. In order for reproduction to occur, AN ORGANISM NEEDS A HOME . . . Extinction is the result when the members of a species lose their homes and cannot find a new home. The loss of homes is what causes extinction. . . . We (people) call these places where life finds homes in great numbers: forests. Forests are the homes of life. Gone are forests, gone is life. (Individual, Austin, TX - #A22389.53100)

It must be remembered that mere presence of a species is not the issue; it is reproductive success that matters. Throughout America, many species are dependant upon the habitat and security afforded by roadless areas for sustaining viable populations of themselves. National implementation of roadless area protection would give an immediate substantial boost to biodiversity. Even the Forest Service and State agencies, who generally favor intensive management regimes, admit that fragmentation of habitat should be guarded against for species like the Cow Knob Salamander (endemic to Shenandoah Mountain on the GWNF; the highest concentration of roadless areas on the Forest is found here). Ensuring protected status for roadless/unroaded areas, with the associated ecosystem recovery, could extend safeguards to other, perhaps as yet unknown, species that presently suffer from habitat fragmentation, alteration, and loss. For example, many species of neotropical migratory songbirds that depend on unfragmented mature deciduous forest are in decline. Intact habitat areas serve as a population "source" for the "sink" habitats that the developed landscape has become. Roadless areas now serve as biotic reservoirs in this era of advancing human development. (Individual, Staunton, VA - #A30027.53200)

#### **FOR SUBSISTENCE SPECIES**

Protecting roadless areas from roads and logging will also have benefits to subsistence uses of the Tongass. In particular, roadless area protections will help keep habitat intact and ensure forage for Sitka black-tailed deer, an especially important species for subsistence hunters in the region. (Organization, Sitka, AK - #A30486.53300)

#### **TO PROVIDE WILDLIFE CORRIDORS**

Wildlife corridors can be provided using roadless areas. Wildlife needs corridors to travel between safe havens. (Individual, Silverthorne, CO - #A28101.53100)

### **610. Public Concern: The Forest Service should protect wildlife.**

#### **BY ACTIVELY MANAGING ROADLESS AREAS**

Being an avid hunter, I am very much aware the game animals survive better where the forest is managed than where it is not. (Individual, Okanogan, WA - #A791.30000)

Anyone who has taken Ecology 101 knows that the climax plant community in most of the mountainous West is a coniferous forest of some type, dependent largely on altitude and aspect. As a wildlife biologist, I believe timber needs to be managed. Coniferous forests do not typically support the greatest diversity of wildlife resources. I urge that timber management/wildlife management be woven into the final management plan for our national forests. (Individual, Salem, OR - #A4253.30100)

**BY RETURNING TO ITS ORIGINAL ROLE OF PROTECTING THE LAND AND ITS WILDLIFE, AS IN THE DAYS OF GIFFORD PINCHOT**

Question regarding describing values. The Forest Service should consider the fact that most of the land area of the United States is roaded and that the Forest Service's role should be returned to its original function of protecting the land and its wildlife as it was in the days of Gifford Pinchot. (Individual, Helena, MT - #A5394.12120)

**BY MANAGING WILDLIFE AND WILDLIFE HABITAT IN COOPERATION WITH STATE DEPARTMENTS OF NATURAL RESOURCES**

I believe the U.S. Forest Service with state D.N.R. cooperation can manage our wildlife and wildlife habitat. (Individual, Mosinee, WI - #A12172.30100)

**BY ALLOWING STATE FISH AND WILDLIFE AGENCIES TO MANAGE POPULATIONS**

The USFS should continue to allow the state fish and wildlife agencies to manage the fish and wildlife populations through carefully regulated hunting and trapping seasons on the USFS lands, because these are vitally important management tools that help balance wildlife populations with people's needs and desires, and provide many benefits to the public at large with no cost to taxpayers. (Individual, Columbia, MO - #A52517.15123)

**BY ALLOWING FIELD RESEARCH IN ROADLESS AREAS**

**Observance of fish and wildlife populations and their natural processes should be allowed.** Fish and wildlife biologists come to the Copper River Delta for field research because they can do something here that they cannot do in other places, observe these populations and their natural process. In other words, there are precious few other undisturbed areas for conducting such research. Research should be an encouraged activity in IRAs. (Organization, Cordova, AK - #A23229.90100)

**BY ALLOWING WILDLIFE RESEARCH, TROUT STOCKING, AND WILDLIFE LAW ENFORCEMENT ACTIVITIES IN AREAS WHERE EXISTING ROADS ALREADY ALLOW MOTORIZED ACCESS**

Wildlife research, trout stocking, wildlife law enforcement, and prescribed burning should be other expressly allowed activities where use of motorized equipment on existing roads is permitted. These activities are consistent with the existing Jefferson National Forest Land Management Plan. (State Agency, Richmond, VA - #A6048.90100)

**BY SUPPORTING LEGISLATION TO PRECLUDE, PREVENT, OR OVERRULE LAWSUITS DESIGNED TO MITIGATE THE SCIENTIFIC MANAGEMENT OF WILDLIFE**

Please consider legislation to preclude/prevent/overrule precocious lawsuits designed to mitigate the scientific management of all wildlife. (Individual, Petaluma, CA - #A16026.20000)

**BY IMPLEMENTING THE THEODORE ROOSEVELT CONSERVATION ALLIANCE SQUARE DEAL INITIATIVES**

I am an avid outdoor enthusiast who believes that you and your new Administration should embrace the Theodore Roosevelt Conservation Alliance's Square Deal Initiative. These initiatives will create a public lands legacy in the coming century that is synonymous with the vision of Theodore Roosevelt, America's greatest conservation president. Initiative #1 asks you to scientifically manage all fish and wildlife habitat in the National Forest System, whether roaded or unroaded, as valuable and unique lands that will remain open to hunters, anglers and other public users. I, along with the TRCA, urge you to balance accessibility to National Forest Lands, with the year round requirements of fish and wildlife such as habitat, clean water, food, shelter, open space and disturbance management, while maintaining a functioning forest road system. This includes keeping roadless areas roadless with science-based exceptions made for forest health, restoration and other national needs. And we also ask that you embrace Initiative #2 to dramatically increase funding and accountability for active fish and wildlife. Funding priorities should not be tied to any commodity production formulas, but rather to achieving

long-term, sustainable fish and wildlife populations. Funding should also include programs that involve all communities in promoting sound forest stewardship and restoration to enhance water quality and fish and wildlife habitat. Bob Munson, our TRCA Director has stated: "In honor of the 'Square Deal' that was TR's hallmark from 1901-1909, our country can settle for nothing less than the public's continued use and enjoyment of their public lands with a priority placed on maintaining healthy and vibrant fish and wildlife habitats." I agree with Bob. Let's use these initiatives to make fish and wildlife a priority on our National Forests. (Individual, Luverne, MN - #A4538.53100)

#### **BY PROTECTING SOUTHERN APPALACHIAN ROADLESS AREAS**

The Southern Appalachians support a world-class biological diversity of plants and animals, which can only be preserved by setting aside from logging and road building large tracts of unfrequented forests. The roadless areas on our public lands contribute significantly to the fact that the Southern Appalachians host one of the world's greatest diversities of mussels and fish and more than half of all tree, fern, and flowering plant species found on the North American continent. More than 3,000 species of flowering plants, 690 vertebrates, and over 120 species of trees all thrive in the roadless areas of this region. Scientific studies have shown that many of our region's species experience serious population declines when faced with habitat destruction caused by logging and road construction. Black bear populations are threatened by excessive road densities. Trout need streams free of sediment caused by erosion from roads and logging to flourish. Similarly, in the biologically rich Southern Appalachians, threatened and endangered species of other animal and plant life benefit from safe havens where logging and road building is not a threat.

As indicated by Dr. James Petranka in his letter to the Forest Service of July 12, 2000, salamanders provide "a compelling example of the need to prohibit logging in the roadless areas." See Attached statement. The Southern Appalachians have perhaps the greatest taxonomic diversity, density and biomass of salamanders in the world according to Petranka. And in order to preserve this biodiversity, roadless areas must be left relatively undisturbed. A recent study showed that clearcuts had a significantly lower abundance and fewer species of salamander compared to mature forest stands in the Southern Appalachians. *J. W. Petranka, M. E. Eldridge and K. E. Haley, Effects of timber harvesting on southern Appalachian salamanders, 7 Conservation Biology 363-370, (1993)*. Plethodon salamanders, common to our region, have especially high mortality after development activities, because they have small home ranges and are unlikely to relocate to intact forests from logged areas. *Id.* at 363. The relatively common land salamander *Plethodon jordani*, an important part of the food chain of our southern forests, completely disappears from clearcut sites in the Southern Appalachians. *A. N. Ash, Disappearance of salamanders from clearcut plots, 104 The Journal of the Elisha Mitchell Scientific Society 116-122, (1988)*. (Organization, Charlottesville, VA - #A15659.53100)

#### **611. Public Concern: The Forest Service should avoid making land designations that restrict wildlife management.**

The Department and other agencies and entities must have the ability to take necessary management actions to ensure the continued well-being of populations of wildlife on the National Forests. The Department does not support additional land designations (e.g., Wilderness designation) or regulations that have the potential to limit or restrict our ability to conduct necessary wildlife management activities on Forest Service lands. (State Agency, Phoenix, AZ - #A22073.53000)

#### **612. Public Concern: The Forest Service should recognize the long-term negative impacts of managing for individual members of species.**

You are presently managing for individuals of a species by halting or severely limiting all activities in an area. The long term impacts will be degrading to the site and eventually damage the species you claimed to be protecting. It is my contention we are managing strictly for the present with no thought to the future. (Individual, Carson City, NV - #A21959.53000)

#### **613. Public Concern: The Forest Service should protect grassland species.**

Administered by the Forest Service, the National Grasslands comprise nearly four million acres of sage steppe and prairie throughout the Great Plains and the intermountain West. National Grasslands are

found in every state from North Dakota south to Texas, as well as Idaho and Oregon. Comprising a critical but often neglected component of our National Forest System, National Grasslands are still home to a vast array of plants and animals. The imperiled black-tailed prairie dog, for example, is a keystone species of the grassland that provides food, shelter, and habitat benefits for numerous other declining species such as the burrowing owl, mountain plover, swift fox, ferruginous hawk, and America's most endangered mammal, the black-footed ferret. Some nine different prairie species are dependent on prairie dogs, and additional 20 species opportunistically take advantage of prairie dog colonies, and 117 more have a relationship with prairie dog towns. The grasslands of the United States, in fact, support some 7,500 species of wildlife, including pronghorn antelope, elk, mule deer, bighorn sheep, golden eagles, numerous kinds of hawks, sage grouse, prairie chickens, whooping cranes, badgers, and an abundant variety of grassland birds.

More than 50 prairie grassland species, however, are now either listed as endangered or threatened under the Endangered Species Act, and more than 700 are candidates for listing. Of the 435 bird species that breed in the United States, 330 of them breed in the grasslands of the Great Plains—and grassland bird species have consistently shown steeper population declines than any other North American birds. (Organization, Reston, VA - #A21625.53000)

**614. Public Concern: The Forest Service should treat wildlife and domestic livestock equally.**

Give wildlife equal right with domestic livestock you allow to graze on forest land. (Individual, Roswell, NM - #A11007.53000)

**615. Public Concern: The Forest Service should value human life over wildlife and plantlife.**

It seems to me that the main people who are aware of these comment periods are the tree-huggers who think that even weeds are more important than people. When a fish that is too stupid to survive takes precedence over people's lives and livelihoods, there is something really wrong with this picture. I have nothing against trying to save endangered species, most of them seem to be endangered because of loss of habitat, which is not a reason to close off areas completely. In California, the tree-huggers even managed to get loc-weed on the endangered list. They did this by using the scientific name. This is not an endangered plant! Western ranchers have been trying, without success, to get rid of this noxious weed as long as there have been ranches in the west. Another farce is the highly endangered Joshua Tree. There are many square miles of them in at least three states. (Individual, No Address - #A8252.15121)

Last month 4 brave true Americans lost their lives because of environmental red tape. A helicopter was not able to get water out of a stream because of endangered fish. Sad day for this country when fish in a stream have more rights than human life. (Individual, Jennings, KS - #A8874.53200)

People should come first, not a turtle or an owl or a rat . . . People need to be able to protect themselves from fire and flood. What good does it do to protect an owl's habitat from people if a fire comes along and destroys the forest because loggers can't come in and clean up an excessive fuel load. There needs to be a middle ground. (Individual, Centerfield, UT - #A27645.30400)

**616. Public Concern: The Forest Service should manage wildlife under recommendations of local fish and game agencies.**

The Forest Service should consider the following characteristics of each inventoried roadless area on each Forest separately (specific activities that should be allowed): **Wildlife**—Forest activities (i.e., timing and intensity) should be governed, in part, by recommendations of the local game and fish agencies, e.g., with regard to mating and nesting seasons. Additionally, as silvicultural practices permit, consideration should be given to effect on habitat of local wildlife and fish species. Special attention should be directed toward streamside activities which may impact fisheries ecology. (Individual, Fort Collins, CO - #A17987.53100)

## Wildlife General – Species-Specific Considerations

### 617. Public Concern: The Forest Service should protect roadless areas.

#### FOR BROWN BEARS

In addition to recreation opportunities, roadless areas are essential for important species of wildlife, particularly brown bears (Suring et al 1997). “The Kenai peninsula has received some of the most significant human impacts in Alaska, to the detriment of some wildlife populations and habitat.” “Bear populations and their habitat are declining due to direct human-caused mortality and human encroachment.” (Organization, Anchorage, AK - #A17358.53200)

#### FOR YELLOW-LEGGED FROGS

I am concerned about the welfare of two of my favorite amphibian species that live in the Sierras, the Foothill Yellow-Legged Frog, and the Mountain Yellow-Legged Frog. Both species live in forested areas, and the Mountain Yellow-Legged Frog is the only frog that lives high up in the Sierra Nevada mountains. (Individual, Redding, CA - #A5690.53000)

#### FOR LYNX AND CUTTHROAT TROUT

The Wyoming Range is a spectacular forest with Canadian lynx and Bonneville cutthroat trout living there—two wildlife species that are very sensitive and imperiled. We need to protect the last remnants of unroaded country in Wyoming to maintain habitat for these unique species. (Organization, Sheridan, WY - #A17593.53000)

#### FOR BUTTERFLIES

I have urged for years that the Dark Divide area in the Gifford Pinchot Nat. Forest be included in Wilderness—it is an important butterfly habitat, and motorbikes are and will continue to destroy the vegetation upon which the butterflies depend. (Individual, Tacoma, WA - #A11709.60000)

#### FOR BEARS AND WOLVES IN THE COOPER RIVER DELTA

I encourage protection of Bears and wolves in the Cooper River Delta. (Individual, Anchorage, AK - #A25357.53000)

### 618. Public Concern: The Forest Service should determine the degree to which native trout are linked to undeveloped areas on public lands.

Despite the ecological significance of roadless areas, millions of public land roadless acres have been lost to development (such as logging roads) in the past 25 years. Therefore, it is critical to determine the degrees to which native trout are linked to undeveloped areas on lands managed for the American people by the United States Forest Service, Bureau of Land Management, and National Park Service. (Organization, Laramie, WY - #A30488.54110)

### 619. Public Concern: The Forest Service should reintroduce and protect predators.

PREDATOR reintroduction and protection should be a management objective. (Individual, San Jose, CA - #A6276.53200)

#### GRIZZLY BEARS

Please support the past efforts on saving roadless areas and the introduction of grizzlies into those areas suitable. (Individual, Plains, MT - #A5801.10150)

### 620. Public Concern: The Forest Service should make the black bear the national wild animal.

Proposal: Make our “Black Bear” our national wild animal, similar to our national bird the “Eagle.” This would be a start toward a civilized society in general. (Individual, Tacoma, WA - #A8589.53000)

**621. Public Concern: The Forest Service should prohibit the killing of black bear.**

I ask that our black bear “killing”, not “hunting” the natural animals of our forests, be eliminated!! Why? should we kill our innocent animals, except for meat! Yearly, like yearly having new cars? We are ridiculous inhabitants of this precious God Given Land, and need to change!! European countries have their 1500 years of faith of enlightenment of reason. What ages do we have or will have? (Individual, Tacoma, WA - #A8589.53000)

**622. Public Concern: The Forest Service should prevent wolf populations from expanding.**

With that in mind lets think about not letting the wolves get our of hand either. They do major destruction to wildlife as well as farm animals and endangerment of small kids recreating in outdoors when their numbers get too high and we are nearing that in the area I reside in. (Individual, Medford, WI - #A6035.53200)

Get rid of the wolves. Its a joke that they are listed as endangered. Alaska and Canada are over run with them and they have taken their toll on our big game herds here in Idaho. (Individual, Carmen, ID - #A7972.53000)

**623. Public Concern: The Forest Service should consider that the reintroduction of coyotes, wolves and bears to certain areas is upsetting the balance between people and animals.**

The reintroduction of coyotes, wolves and bears to certain areas is upsetting the balance that was established with the people population increase. (Individual, Klamath Falls, OR - #A8809.20000)

**624. Public Concern: The Forest Service should use elk as a management indicator species.**

The CERT [Clearwater Elk Recovery Team] believes that any resulting USFS roadless policy should be based upon a heavily weighed, local input process that develops recommendations to the cyclic revisions and infrequent amendments to individual National Forest Plans. In the Clearwater Basin, elk must continue to be a major indicator specie both in National Forest Plan and in the reality of accomplished, active forest management. (Organization, Moscow, ID - #A15318.53300)

Place a high priority for creating and rejuvenating elk forage in the Clearwater and Nez Perce National Forests and throughout Idaho. Put action in maintaining elk as a major indicator species in the Idaho National Forest Plan through active forest and rangeland management. Give your service the ability to manage its forests on a site-specific basis that is locally advised. (Organization, Viola, ID - #A23458.53300)

## *Funding*

**625. Public Concern: The Forest Service should more effectively utilize funds earmarked for protection of wild horses.**

We feel the money being used to protect wild horses could be better utilized. (Individual, Troy, OH - #A10718.17100)

**626. Public Concern: The Forest Service should recognize that building roads in the Skagit River watershed would route funds away from salmon recovery efforts.**

In Washington, the Forest Service is working with the Skagit Watershed Council (of which The Nature Conservancy of Washington is a founding member) to procure state Salmon Recovery Funding Board monies to protect endangered salmon runs. The construction of additional roads in the Skagit River watershed would counter the positive work that the Forest Service is doing, and could route salmon recovery funds away from other critical salmon protection and restoration projects in order to mitigate the harmful effects of federal roads. (Organization, Seattle, WA - #A21904.17240)

***Effects of Activities/Disturbance on Wildlife*****627. Public Concern: The Forest Service should recognize that wildlife is resilient to Active Management.**

In seeking to provide more habitat for wildlife, the motivations of the Forest Service are laudable. However, the strategy proposed for doing this is flawed. Wild creatures are more resilient than most people would like to admit. Peregrines inhabit the heights of office buildings in Detroit. Cranes, herons and hundreds of other species live in the Detroit River, surrounded by industry. (Individual, Palisade, CO - #A20897.53100)

**628. Public Concern: The Forest Service should recognize that roads do not harm wildlife.**

A common objection to roads is that they will negatively impact wildlife. Here are several examples to show that wildlife don't seem to care.

Several years ago I visited Glacier National Park and drove through the park on the Going To The Sun Highway like thousands of other tourists do every year. This is a road that could never be built in today's political climate since it goes through a wilderness. Yet near the highway were many mountain goats undisturbed by the tourists stopping to take their pictures.

In Jasper, Alberta, elk regularly wander through the town and eat the people's gardens, as deer do in many western Oregon towns.

I have a picture on my desk of three grizzly bears walking on the Alaska pipeline. Opponents of the construction of this pipeline cited harm to wildlife as a major reason not to build it. Apparently the bears were not solicited for input. (Individual, Springfield, OR - #A21815.53000)

Avoid all road and trail closures based on wildlife concerns except where negative wildlife impact can be specifically identified and documented. Motorized use on existing trails has little or no verified effect on game animal welfare. In fact, some of the areas more intensely visited by motorized visitors have experienced significant increases in wildlife populations; further substantiating the fact that motorized recreation does not in itself create a significant impact on wildlife. (Organization, Helena, MT - #A13226.91211)

**FISH**

The argument that dust from unpaved roads is settling in streams and causing difficulty for spawning fish, including salmon and steelhead is laughable. There was a preceding generation in Idaho's mountains and valleys that only had unpaved roads and trails, and may have been at times more numerous than now, the dust of which, (horses, wagons, larger than herds of cattle/bands of sheep) created clouds of dust, and yet 35 years ago Idahoans could catch plenty of salmon and steelhead and 15 trout per day, plus bag more than one deer in several areas. (Individual, Bellevue, ID - #A30175.54000)

**THE DESERT TORTOISE**

I've spent a good bit of time north of Barstow and, for awhile, this area was closed off because off-road drivers and prospectors posed a danger to the desert tortoise. Off-road drivers would run over them and

prospectors dug holes for them to fall into that they couldn't get out of. In at least six years of hunting for gold in this area, I have only seen one dead tortoise and its remains were under a bush. I've never seen one that was run over or trapped in a hole. In fact, the biggest tortoise that I've ever seen was going from tailing pile to tailing pile, eating new growth and ignoring the old growth between the piles. (Individual, No Address - #A8252.53200)

#### **ROADS DO NOT IMPEDE WILDLIFE MOVEMENT**

Grizzly bears do cross roads—even oiled ones, deer, elk and moose become suburbanites witnessed by the number of road kills. All these animals have four legs and can and do skip into the next draw or over the next ridge when a vehicle of any kind approaches. (Individual, Whitefish, MT - #A5102.53000)

#### **629. Public Concern: The Forest Service should recognize that vehicles do not disturb wildlife.**

As for the claim that vehicles of any type disturb the wildlife just doesn't hold water. I have [lived] in the foothills and mountains of Colorado for the last 35 years. In most areas there is more wildlife living among the people and homes than there ever was, I see foxes and deer on a daily basis, bears on occasion, have heard mountain lions (know many people who have seen them), bobcats, coyotes. When first moved here we almost never saw this wildlife (including the deer that we only saw occasionally), so that the wildlife has a problem with people again doesn't hold water. The only areas that I have seen a drop in the amount of wildlife that can be seen regularly is in some of the western slope areas that have been (in my opinion) over hunted (and yes I am a hunter but have quit hunting deer due to this problem and probably not even hunting elk this year). As for the argument that there are more sightings of wildlife due to more people, maybe but if the animals have a problem with people why haven't they moved to more remote areas (and there are still large areas without homes or people in Colorado, Wyoming, etc.)? (Individual, Boulder, CO - #A4480.53100)

#### **630. Public Concern: The Forest Service should recognize that the impacts of road fragmentation are greater than the impacts of fire.**

The vast majority of birds and small to mid-size animals that went extinct in the last 450 years lived on islands, and paving roads through an ecosystem slices and dices the entire system into islands. Slapping a road through an ecosystem is far more deadly than fire. In a few years, an ecosystem rebounds from fire. Fire is a natural part of the ecology of Earth but not so a concrete road. A paved road will always kill, and kill, and KILL. An ecosystem and biological diversity will rebound from fire, but a paved road will always be an EARTH-KILLER! Forever! **Every yard of ecosystem paved and slathered over is another yard of dead planet.**

EXTINCTION IS FOREVER and paving roads causes extinction! "THE MASS EXTINCTIONS WHICH THE EARTH IS CURRENTLY FACING IS A GREAT THREAT TO CIVILIZATION SECOND ONLY TO THE THREAT OF THERMONUCLEAR WAR." \*NATIONAL ACADEMY OF SCIENCES. (Individual, No Address - #A18867.50100)

#### **631. Public Concern: The Forest Service should not use elk forage enhancement as an excuse for timber removal.**

No amendments to this **Roadless Area plan** should allow for **helicopter-entry logging or experimental thinning studies**, NO PATCH CLEARCUTS IN THE NAME OF ELK FORAGE ENHANCEMENT or salvage logging. We already have plenty of lands in which we can conduct these activities. (Organization, Albany, OR - #A19057.90520)

#### **632. Public Concern: The Forest Service should address the effects of fire on fisheries.**

The fires that burned in Montana in 2000 and now in 2001 have been devastating to fisheries, particularly bull trout and cutthroat trout spawning streams of the Bitterroot National Forest and the Big Creek drainage of the North Fork of the Flathead River. (Business, Kalispell, MT - #A29034.54100)

**633. Public Concern: The Forest Service should allow trapping as a wildlife management tool.**

I also support trapping on national forest lands as a wildlife management tool. (Individual, Fort Morgan, CO - #A19961.91410)

**Positive Effects****634. Public Concern: The Forest Service should allow timber removal.****FOR THE BENEFIT OF WILDLIFE**

My primary reason for opposition is that it creates a problem with the necessary timber management required for good wildlife management. A diversified forest benefits game management while providing economic development opportunities. As an avid outdoorsman I have seen firsthand the benefits to wildlife from timber harvesting. A timber harvest (i.e. clearcut) properly managed by wildlife biologists is probably the most important single factor beneficial to the greatest number of species of wildlife in a timbered region. This provides a year round food source and shelter/cover for nesting, protection from cold winds and severe weather, and escape from predators. The forest of varied age growth among hardwood mast producing trees will increase the likelihood of mast production in any given year as often the younger trees will produce even when the older larger trees do not. The new growth in a young (2 to 10 year old) clear cut area provides browse and diversity of plant life throughout the entire year that is very beneficial to deer, bear, turkey, grouse, squirrel, and many other species including those that prey on the former. In a mature forest mast producing trees generally bear mast only every few years. This is a bonanza for the wildlife that rely on this food source when it occurs, but when it is gone, often in a matter of several weeks, there is very little to eat for the next couple of years.

This is another point where the importance of a properly managed harvesting operation is necessary. A young forest will likely contain numerous species of mast producing trees and plants that produce annually and at different times within the same year providing a reliable food source for an extended period of time. Some of these additional species include grapes, dogwood trees, wild cherry trees, blackberry vines, sassafras, numerous weed species providing seeds and browse, etc. While these species of plant life will likely be eliminated as the young forest matures back to its original make-up, it is of great importance to allow this diversity to flourish for the few years that it can. Then hopefully there will have been other harvest areas close by that are in this age bracket that will then be providing for this necessary source of food and cover. Properly managed, we will have rotated throughout the forest region and will be ready to harvest this same area in another 100 years. (Individual, Roanoke, VA - #A11780.30100)

**TO ENCOURAGE THE GROWTH OF HUCKLEBERRIES FOR GRIZZLY BEARS**

Grizzly bears have become increasing problems in this area of northwest Montana. Their habitat management direction has become hands-off, de facto wilderness with no vegetation management even though the Forest Service acknowledges that logging is a tried and true method to improve grizzly habitat. Our Grizzlies are not and cannot eat security. Instead they have been relegated to putting on calories by eating garbage, dog food and birdseed in housing areas and towns because their normal food sources are being crowded out in dense, unhealthy forests.

Huckleberries, their normal food source, need sunlight and forest openings for regeneration and berry production. This valuable plan was the subject of a five-year study, *The Ecology and Culture of Montana Huckleberries: A Guide for Growers and Researchers* (by Dr. Nellie Stark and Stephen Baker at the Montana Forest and Conservation Experiment Station School of Forestry, University of Montana) funded in part by the U.S. Forest Service. It needs sunlight, does not survive fire well because of its shallow rhizomes that spread in woody debris, and the researcher estimates that conditions for germination from seed may only exist once every seventy years. Unlike most tree seedlings, huckleberries do not do well in a nursery setting either. There is a great tragedy playing out in the survival of bears and huckleberries because our forests are deteriorating with the lack of active management. (Business, Kalispell, MT - #A29034.53100)

**635. Public Concern: The Forest Service should allow thinning.****TO PROMOTE PLANT GROWTH AND FEED FOR WILDLIFE AND BIRDS**

In regard to making more of our national forests roadless, I believe the 24.2 million acres on which new roads are already banned is enough of the 58.5 million roadless acres. With what you consider marketable timber on only 9 million of those 34.3 million acres, that small percentage should not have an adverse effect on the forests. Thinning would undoubtedly help promote plant growth for the animals and birds to feed on. (Individual, Big Timber, MT - #A5630.30530)

**636. Public Concern: The Forest Service should provide retaining pools when installing culverts.****FOR WILDLIFE IN THE DRY SEASON**

When placing culvert pipes, consider building a reasonable size water retaining pool on the upper side, or lower, for pump chance and for the wildlife in the dry season. (Individual, Cottage Grove, OR - #A11071.53000)

**637. Public Concern: The Forest Service should retain dams and fix fish passage ladders.**

Keep all dams on all rivers. Just fix the ladders to help fish upstream. (Individual, Grants Pass, OR - #A11357.54100)

**638. Public Concern: The Forest Service should recognize the beneficial impact of ranch management on wildlife.**

Ranchers develop water ponds—provide salt and supplements that also help wildlife. (Individual, Decatur, IL - #A11051.53000)

**639. Public Concern: The Forest Service should recognize the benefits of fire, disease, and insects to bird species.**

Many bird species that are declining rely on fire, disease and insects. In particular, Lewis's Woodpeckers, Three-toed Woodpeckers, Black-backed Woodpeckers, Olive-sided Flycatchers and Townsend's Solitaires rely on fire to create their habitat. (Organization, Helena, MT - #A20874.53100)

***Negative Effects*****640. Public Concern: The Forest Service should address the negative effects of roads on wildlife.**

Roadbuilding also adversely impacts forest health by:

Harming wildlife through the displacement of species sensitive to disturbance or dependent on forest interior habitat. For example, species such as grizzly bears, wolves, and elk avoid otherwise suitable habitat near roads.

Roads create barriers to the movement of many species. Small animals such as salamanders, frogs, and mice will rarely cross roads or are killed by vehicles when crossing.

Roads are barriers to dispersal, isolating populations on one side of the road from those on the other. This results in the loss of gene flow between populations and the potential vulnerability of some species to inbreeding or environmental catastrophes. (Individual, Anchorage, AK - #A20934.53110)

Keep the wild in the last remaining wildlands of this nation. We need to think of these places as interconnected units they need to remain protected fully so that the animals that call them home can continue to exist. It has been shown that roads no matter how rural have had a significant impact on the migration of wildlife and that conversely has an impact on their populations. The Canadian national

parks have already seen a decline in predator populations in wildlands where roads bisect the tremendous preserved acres. We cannot continue to make the same mistakes and we need to view all these areas and the surrounding areas as important areas for wildlife. (Individual, Wilmington, DE - #A4268.50520)

Roads are a specific type of disturbance that fragment the landscape for a range of sensitive species, and create zones of elevated mortality for others. The critical values protected in roadless areas are landscapes where near-natural disturbance regimes prevail: they provide an ecological benchmark for scientific research, an emergency backstop against catastrophic ecological change, and a critical source area for metapopulations, from which regenerating landscapes can be recolonized. (Individual, No Address - #A4777.50520)

As a biologist working in the Yellowstone-Teton Range area. I fully support protection of roadless areas. These areas are extremely important as a refugia for sensitive wildlife. Roadless lands provide many hazards for wildlife, including poaching, excessive hunting, illegal logging, litter, dumping and too much human use. (Individual, Victor, ID - #A5336.53000)

80% of all the wolves killed in one of our largest national parks are killed because of the railroad running through it. A moose or deer is struck and killed by the train. Subsequently, a wolf comes to eat the moose or deer and the wolf is killed. Roads running through our pristine wilderness areas would cause the same problem. It would be cruel to and unsafe for the wildlife in these now roadless areas. Please do not allow roads. (Individual, Holden, MA - #A6912.90130)

#### **ON NON-NATIVE BIRDS AND PLANTS**

Working in the Colorado and New York State Breeding Bird Atlases, I got to see first hand how destructive roads in our forest are on introducing new species of birds (cowbirds and starlings etc.) and foreign plant species (Russian Knap weed and thistles etc.). Also forest are fragmented, streams and air are polluted. (Individual, Franktown, CO - #A5142.50000)

#### **DECREASED POPULATION VIABILITY**

In the Interior Columbia Basin Ecosystem Management Plan, USFS, USFWS and BLM scientists found that roads directly impacted the current and future population viability of 28 of 78 (36%) high priority terrestrial vertebrate species and 17 of 31 (55%) of the very highest priority species brought forward for the Supplemental Draft EIS. The impacts of roads on these species were analyzed and are part of the ICBEMP record and publications. This undeniable impact of roads on wildlife can only be addressed by protecting roadless areas and removing a large percentage of existing roads. (Individual, Boise, ID - #A23621.53000)

### **641. Public Concern: The Forest Service should address the negative effects of roads on fish.**

Roads can bring changes to water volume, speed, temperature, which can negatively affect a host of animals including trout and salmon. (Professional Society, No Address - #A26799.50000)

#### **SEDIMENTATION**

Yellowstone, Bonneville, Colorado and Snake River Cutthroat trout depend on clean streams that flow through roadless areas for their survival. Roads are the primary source of sedimentation in our national forests, causing the decline of fisheries and harm to other aquatic species. (Individual, Jelm, WY - #A27247.54000)

#### **LOSS OF SPAWNING HABITAT**

Other aspects of the effects of roads on salmon and trout streams remain to be studied—perhaps studies are underway. Important among these is the effect of erosion as the result of the construction and existence of roads. Nearly all of the Tongass consists of steep terrain. In combination with high rainfall, the inevitable effect is erosion, to the detriment of good salmon spawning gravel. Of course the logging

also adds to that erosion: since 1990, 100-ft. buffer strips have been required along major streams, but no such protection is required for upper tributary streams. These streams which send debris and mud onward into the lower fish-bearing streams, are becoming more at risk as the logging is more often forced into the upper elevations now that the lower elevations have been logged. Moreover, the lesson has been learned elsewhere that 100-ft. buffers are not sufficient. (Individual, Gustavus, AK - #A19067.54100)

Roads act as stream runoff collectors that direct high flows, sediment, and other non-point pollutants into streams, covering spawning habitat and reducing rearing capacity for salmonids. Most roads parallel valley floors, often with little or no stream buffer. When a stream naturally meanders towards a roadway, road engineers armor the eroding stream bank with rip-rap, channelizing the stream and further degrading fish habitat. (Individual, Juneau, AK - #A23242.54100)

#### **STOCKING NON-NATIVE SPECIES, ACCESS BY LIVESTOCK, OVERFISHING, AND DISEASE TRANSMISSION**

As part of the efforts to protect native trout and their habitat, the Campaign evaluated the relationship between public land roadless areas and existing native trout populations. Roads are a significant cause of trout habitat damage and water quality degradation. Roads also facilitate stocking of non-native trout and other fish species, access by livestock, overfishing, and disease transmission. Unfortunately, like native trout, roadless areas are a diminishing resource on the public lands. In many instances, roadless areas outside of wilderness and national parks have not been protected from on-going development. (Organization, Laramie, WY - #A30488.54100)

#### **642. Public Concern: The Forest Service should close roads.**

##### **TO MAINTAIN UNFETTERED MIGRATION ROUTES FOR WILDLIFE**

It is incredibly important that what little unfettered migration routes for animals are left be kept intact, or even improved upon by closing down existing roads and letting them go back to nature. (Individual, No Address - #A1692.53000)

##### **TO INCREASE ELK POPULATIONS**

I worked on the Kaibab National Forest which was one of the forerunners in closing roads and not making new ones. The benefits that we saw were innumerable and spanned across several interests, not just for “environmentalists”. The most notable effects known by people in the region was the quality of the wildlife, especially seen in the Trophy Elk taken from this area by hunters, which was due solely in part to the Kaibab’s policy on roads. (Individual, Glendale, AZ - #A1908.53300)

#### **643. Public Concern: The Forest Service should address the negative effects of off-road vehicles on wildlife.**

Motorized off-road vehicle travel should also be expressly prohibited. The negative impact of off-road vehicles (ORVs) on wildlife is becoming ever more apparent, particularly as off-road vehicles become faster, more common, and able to conquer more terrain. ORVs provide access for hunters, poachers, and others who might intentionally or unintentionally disturb wildlife. They can transport disease, fungi, and non-native species. They generate extreme noise and air pollution. Overuse of certain areas creates de facto roads that are often in inappropriate locations and can lead to severe erosion, wildlife impacts, and scars on the landscape. The roads and snowmobile trails used by ORVs can provide access, in the form of a trail or hard-packed snow, into previously inaccessible areas for not only humans but also for some wildlife. For example, coyotes and bobcats can follow hard packed snow into areas where they can compete with the lynx, which is otherwise better adapted to deep snow. (Organization, Washington, DC - #A18031.90110)

#### **644. Public Concern: The Forest Service should address the negative effects of inadequate stream culverts on fish passage.**

Many aspects of roads need to be considered. One of the most important impacts is on streams that are crossed by roads. Past road-building practices have left many culverts over anadromous fish streams

inadequate for fish passage. Attention to this aspect of road building is crucial for Southeast's commercial, sport, and subsistence fisheries. (Individual, Petersburg, AK #A21351.54100)

The roads that have been built at enormous cost have not been environmentally benign by any measure: the Forest Service and Alaska Department of Fish and Game report that as many as 66% of logging culverts over anadromous fish streams, and 85% of resident fish stream crossings are not adequate for fish passage. (Organization, Reston, VA - #A21625.54100)

The Forest Service has failed to adequately maintain the logging roads already constructed in the Tongass, thereby blocking salmon passage, fouling spawning areas and degrading water quality with sedimentation. (Elected Official, Tenakee Springs, AK - #A3358.54100)

#### **STOP CONSTRUCTING NEW ROADS UNTIL EXISTING ROADS AND CULVERTS ARE REPAIRED**

Tongass streams spawn 80% of all salmon in Southeast Alaska yet, you yourselves report that as many as 66% of logging road culverts over anadromous fish streams and 85% of resident fish stream crossings are not adequate for fish passage. The Alaska Dept. of Fish and Game agrees. We suggest that if the Forest Service cannot maintain existing roads and lacks funding to correct blocked culverts, it should stop building new roads. (Director, Tribal Resources, Hoonah, AK - #A3024.54100)

Commercial fishing, the area's largest private employer, requires the pristine Tongass streams for salmon to spawn and for young salmon to grow. But, most of the existing logging road culverts do not allow passage of resident salmon, due to blockages, lack of maintenance, or poor design. The Forest Service should fix these roads, not build more that will just block more fish and lead to the decimation of the Tongass salmon population. We need to learn from the mistakes made in the Pacific Northwest and protect the habitat needed for healthy salmon runs. (Individual, Everett, WA - #A4799.54100)

### **645. Public Concern: The Forest Service should prohibit all Active Management and Resource Use.**

#### **TO PROTECT WILDLIFE**

These areas are our remaining wild unprotected areas of the United States; these areas especially in my region (northeastern Washington and northern Idaho) are home to some of the nations major endangered species, Mountain Caribou, Grizzly Bear, Bull Trout, Gray Wolf and Lynx. The only way I see any protection for these animals and for these remaining wild areas, is a roadless rule that does not allow for resource extraction of any kind. (Individual, Spokane, WA - #A820.53100)

### **646. Public Concern: The Forest Service should address the negative effects of timber removal on wildlife.**

#### **FOREST INTERIOR BIRDS**

In his letter calling for inclusion of a prohibition on logging and road construction in the final rule, Dr. David S. Lee, ornithologist and Curator of Birds at the North Carolina State Museum of Natural Sciences, confirms that forest interior birds are particularly sensitive to disturbances created by logging. . . . In the southern forests, which are critical neotropical migratory songbird breeding habitat and migration flyway, timber activities create edges which, particularly in eastern forests, facilitate cowbird parasitism of the nests of other birds. M. D. Baker and M. J. Lacki, *Short-term changes in bird communities in response to silvicultural prescriptions*, 96 Forest Ecology and Management 27-36 (1997). Research has found that this cowbird behavior has contributed to the population declines of many neotropical migrant bird species. See Id. and *see also* K. V. Rosenberg, J. D. Lowe and A. A. Dhondt, *Effects of forest fragmentation on breeding tanagers: a continental perspective*, 13 Conservation Biology 568-583 (1999). General nest predation rates in Southern Appalachian forest fragments has also been found to increase as forest fragment size decreases. A.J. Keyser, G. E. Hill and E. C. Soehren, *Effects of forest fragment size, nest density, and proximity to edge on the risk of predation*

to ground-nesting passerine birds, 12 Conservation Biology 986-994 (1998). (Organization, Charlottesville, VA - #A25689.53200)

### SALAMANDERS

As indicated by Dr. James Petranka in his letter to the Forest Service of July 12, 2000, salamanders provide “a compelling example of the need to prohibit logging in the roadless areas.” The Southern Appalachians have perhaps the greatest taxonomic diversity, density and biomass of salamanders in the world according to Petranka. And in order to preserve this biodiversity, roadless areas must be left relatively undisturbed. A recent study showed that clearcuts had a significantly lower abundance and fewer species of salamander compared to mature forest stands in the Southern Appalachians. J.W. Petranka, M.E. Eldridge and K.E. Haley, *Effects of timber harvesting on southern Appalachian salamanders*, 7 Conservation Biology 363-370, (1991). *Plethodon* salamanders, common to our region, have especially high mortality after development activities, because they have small home ranges and are unlikely to relocate to intact forests from logged areas. Id. At 363. The relatively common land salamander *Plethodon jordani*, an important part of the food chain of our southern forests, completely disappears from clearcut sites in the Southern Appalachians. A.N. Ash, *Disappearance of salamanders form clearcut plots*, 104 The Journal of the Elisha Mitchell Scientific Society 116-122, (1988). (Organization, Johnson City, TN - #A20341.53110)

#### 647. Public Concern: The Forest Service should restrict hiking in roadless areas.

##### IN AREAS WHERE CALVING OCCURS

When determining what restrictions are necessary, the forest must set new guidelines based on good, undisputed data. Perhaps . . . hiking should be banned in some areas where calving occurs. (Individual, No Address - #A29334.90110)

#### 648. Public Concern: The Forest Service should address the effects of fire on species extinction.

The loss of species to an agonizing death from fire is terrible. We do not know what unique species of life may be extinguished forever because of the fires. I recall that a unique tree in the Northwest is the source of Taxol, an important lifesaving drug. We have no assurance that a similar discovery may have escaped notice in the areas destroyed by fire. (Individual, South Royalton, VT - #A13393.50000)

## Wildlife Habitat

### Summary

**General Comments** – A number of respondents comment on wildlife habitat. Some assert that the Forest Service should protect roadless areas for habitat for various species, and that it should preserve fish and wildlife habitat as a priority. Some suggest types of habitat that would benefit from roadless area protection, such as wetlands, migratory bird habitat, interior species habitat, salmon and trout habitat, and wolf and fox habitat. Respondents also provide a wide variety of strategies for preserving habitat. Some of these strategies include reducing the effects of human encroachment, avoiding development of wetlands, retaining dead and downed trees, providing wildlife corridors between roadless areas, increasing elk forage, and allowing continued maintenance of wildlife habitat improvements.

Respondents also frequently discuss habitat fragmentation. Many request that the Forest Service address the negative effects of habitat fragmentation and also take steps to prevent it.

Respondents suggest prohibiting road building and protecting roadless areas to prevent fragmentation.

**Effects of Activities/Disturbances on Wildlife Habitat** – Some respondents believe that the Forest Service should allow various activities due to their positive effects on wildlife habitat. One organization asserts that some even age management should be occur in order to maintain habitat diversity and support the species of disturbance ecosystems. Some suggest allowing limited timber removal, the use of fire to clear out old growth, dredging, grazing, and road building to benefit wildlife habitat.

In contrast, other comments on this topic conclude that certain activities have negative effects on wildlife habitat. Respondents state that the Forest Service should prohibit mining, thinning, developed activities, and road construction in order to protect wildlife habitat. Some also add that the Forest Service should address the negative effects of roads on specific wildlife habitat such as American marten habitat and beaver habitat.

### *Wildlife Habitat General*

#### **649. Public Concern: The Forest Service should manage forests for habitat rather than for “values.”**

If the water is clear enough for fish survival, the fuels discontinuous enough that fires can be limited within reason, there’s huntable game, and resource producers can still produce, that’s good enough for me.

I really don’t give a rat’s fanny about “values,” especially the sort of unquantifiable “non-use values” so popular with the preservationist crowd. I fail to see the “value” in an unmanaged forest that can go up in flame at any time, wrecking habitat from ridge to ridge at a time when there isn’t a hell of a lot of habitat to spare in some cases. I would rather have partly-functional habitat than no habitat at all. Of course, if the habitat goes up, then the species become MORE endangered and then the eco-lawyers can get LOTS of “value.” (Individual, Whitefish, MT - #A20672.50000)

#### **650. Public Concern: The Forest Service should more adequately describe desired future conditions to reflect wildlife habitat.**

The Forest Service has not adequately described the desired future condition (DFC) of Roadless Areas. We believe the future condition of Roadless Area should be characterized predominantly by remote (backcountry) landscapes where ample habitat exists to support a rich diversity of wildlife and other natural resources, as well as the type and quality of recreation that depends on serene, natural surroundings. The FS, however, must balance the demand for remote landscapes against the need to manage habitats for wildlife, water quality, and fire. Data clearly shows that mule deer and elk need the security provided by wild areas without much roading, but it is the shortage of managed habitats in these remote landscapes that limits population size, distribution, and health of these and many other species. (Organization, Washington, DC - #A21762.50000)

#### **651. Public Concern: The Forest Service should consider the size of inventoried roadless areas.**

##### **TO MAKE SURE THEIR SIZE IS CONSISTENT WITH THE HABITAT REQUIREMENTS OF INTERIOR-DWELLING SPECIES**

The sheer size of an IRA parcel should also be considered to make sure it is of a size consistent with the habitat requirements of interior-dwelling species which are being promoted. This is by no means an all inclusive list. A set of national criteria needs to be created for evaluating IRAs and those criteria should be applied through the local planning process. (State Agency, Madison, WI - #A28775.45330)

## 652. Public Concern: The Forest Service should address the negative effects of habitat fragmentation on wildlife.

In both the Tongass and elsewhere (Pacific Northwest, Amazon), forest fragmentation has been found to have detrimental effects on populations of individual species such as Sitka blacktailed deer and on overall species diversity and abundance. Road construction contributes to these effects by both directly increasing mortality (hunters, trappers, and drivers use roads whether or not you close them) and by facilitating further fragmentation of habitat (timber sales follow roads, roads themselves can pose significant barriers to dispersal in some organisms). Recent research in the Tongass indicates that the fragmented landscapes produced by logging and road-building cause a significant DECREASE in avian community diversity compared to continuous old growth forest. (Professional Society, No Address - #A26225.53100)

**Habitat Fragmentation**—Roads break up local populations of smaller animals and plants, potentially leading to local extinctions and disruption of behavior and movement patterns of large animals, such as elk and pronghorn antelope. (Professional Society, Lincoln, NE - #A19374.53110)

### BEARS

My concern was and still is for wildlife habitat—especially Grizzly Bear Habitat. Rooding makes it difficult for the bears to move to new food sources and increases the likelihood of Bear/Human confrontations. Rooding definitely diminishes the Bear's habitat. (Individual, Riverton, WY - #A20861.53110)

## 653. Public Concern: The Forest Service should protect roadless areas.

### FOR WETLAND SPECIES PROTECTION

Let's not forget that the eastern Delta is one of the world's most important wetlands (according to Ducks Unlimited and others) in terms of migratory and breeding birds; that this is the largest wetland on the Pacific coast of North America; and that still contains healthy populations of salmon. At a conference held in May 1999 in Cordova, USFS administrators and researchers, and researchers from academia, recommended that Cordova become the site of a major wetland research facility to study this intact, functioning wetland so that the research could be used to help restore damaged wetlands and Pacific salmon stocks in the northwest U.S. None of this proposed development and research depends on roads and, in fact, could be harmed by more roads into the region. (Individual, Cordova, AK - #A8044.53100)

### FOR ELK REINTRODUCTION

The state is reintroducing elk into this area and has plans for introducing other species. These animals need huge expanses of roadless areas that are rare in this area. We should not destroy those that we currently have. (Individual, Soddy Daisy, TN - #A13508.53100)

### FOR MIGRATORY BIRD HABITAT

Numerous bird species, particularly migratory birds, depend partly or entirely on roadless forests for breeding, feeding, and resting on their migratory journeys. Cerulean, Cape May and black-throated green warblers, wood thrushes, and ovenbirds are all birds that need interior woodlands to thrive. Edge species that impact interior birds through predation, competition, and parasitism include crows, jays, cowbirds, and raccoons. There is some indication that unroaded tracts of forests 1000 acres or less can provide enough interior habitat to suit at least some interior birds, which is one of the reasons parcels of this size should receive immediate protection under the roadless policy. (Organization, Washington, DC - #A18031.53100)

### FOR INTERIOR SPECIES HABITAT

The characteristics that make roadless areas so important are largely a factor of their size. One of the most important roles roadless forests play is a barrier to predators and competitors better suited to the forest's edge. Roads provide access for these non-interior species to forests that were previously off-limits to them, where they can wreak havoc on susceptible plants and animals of forest interior. A resulting change in plant composition may reduce or eliminate the food or habitat relied on by forest-

interior animals. Diseases, fungi, non-native species, and pests can also be kept at bay by deep, unbroken forests. Roads, clearcuts, and other openings also change the climate of a forest, for as far as 500 feet or more into the adjacent forest. Openings in the trees allow more wind, light, and noise to enter. The result is often a warmer, drier forest that may be uninhabitable for interior species, suitable for edge species, or both. (Organization, Washington, DC - #A22129.50520)

The roadless areas provide abundant and diverse values, but first and foremost emphasis should be placed on preserving areas that provide a template and source of information for research regarding biological resources. Roadless areas are particularly important in this context because they are relatively unfragmented and can provide large amounts of interior habitat relative to edge, and this condition is becoming extremely rare in the landscape. In addition, these areas provide valuable wildlife habitat and water protection benefits that are challenging to restore or replace. (Association, Minneapolis, MN - #A19249.45100)

#### **FOR KENAI PENINSULA HABITAT**

While peninsula brown bear habitat effectiveness has been reduced by 70% on CNF lands, adjacent habitat on the Kenai National Wildlife Refuge (KNWR) been reduced by thirty percent (KNWR). Most management activities have occurred in the lower elevations, fragmenting valleys and wildlife travel routes. However, under the preferred alternative management activities will continue to change the distribution of certain species across the forest by continuing to concentrate activities in these valleys. The Kenai song sparrow and seven subspecies of mammals are restricted to the Kenai Peninsula (3-58). Ironically however, the preferred alternative places the most change, with the least amount of protections here.

Several telemetry studies give compelling evidence to the island-like geography of the Kenai. There is little to no genetic interchange between the Kenai and mainland Alaska for some wildlife populations, such as brown bears, lynx and wolves. All of these species are on Federally listed in the lower '48 due to isolation, habitat fragmentation, development and human disturbance, conditions not unlike those that exist on the Kenai. The geographic land bridge, which enable genetic interchange, was severed this summer with the Whittier access road. It took wolves nearly 50 years to naturally economize the peninsula after being eradicated in the early 1900s. Caribou had to be reintroduced after their decimation, never naturally colonizing (KNWR). Human impacts were much lower at the time of colonization than they are now. Future management of CNF lands will determine the outcome for some of these species. The preferred alternative must permanently protect habitat of critical importance, especially for those species, which may be isolated. WE strongly recommend coordination with federal landholders that share CNF boundaries, such as the Park Service and Fish and Wildlife. (Organization, Anchorage, AK - #A23038.53100)

#### **FOR CLEARWATER BASIN HABITAT**

Studies by Carroll, Noss, and Paquet (2000) show the Clearwater Basin wildlands to be the most important areas for carnivores in the US and Canadian Rockies. The roadless areas provide clean water and spawning grounds for native fish and the unfragmented, large tracts of forests for wildlife such as grizzly bear, wolf, goshawk and pine marten. Forest Service studies have found streams and rivers are healthier in roadless areas than in roaded, logged places. (Organization, Moscow, ID - #A22654.50000)

#### **TO PRESERVE HABITAT FOR INDIGENOUS WILDLIFE**

An emphasis should be made to assure that sizable habitats are provided for the indigenous wildlife of America, quite apart from its function to people. Once sufficient land has been permanently set aside to assure the continuation and development of these species in isolation, then there is more flexibility with remaining public lands. At this moment, more land, not less, needs to be kept and conserved in roadless areas. (Individual, Lexington, KY - #A1077.30200)

#### **TO PRESERVE SALMON HABITAT**

Healthy salmon runs are the backbone of the ecosystem and economy in Southeast Alaska. In contrast to the rest of the Pacific coast, millions of salmon still return to the rainforest streams each fall. Large trees along rainforest streams provide critical fish habitat. They help maintain steady water temperatures by

providing shade and maintain flow rates by controlling runoff. Woody debris from dead trees helps preserve stream structure and nutrient supplies important for juvenile salmon. High-quality, intact forest is essential for continued wild salmon runs. (Organization, Nevada City, CA - #A4941.54100)

The Tongass still has healthy salmon runs. More roads will jeopardize these salmon stocks which will result in ESA listings and ruin a sustainable way of life for many people in the SE Alaska. (Individual, McKinleyville, CA - #A1269.20222)

#### **TO PRESERVE TROUT HABITAT**

Many trout populations, like bull trout and most cutthroat trout populations, are severely fragmented and depressed. Much historic habitat is degraded, rendering all remaining habitat critical to native trout persistence. High quality habitat is rare. Any further degradation increases likelihood of trout extirpation. These conditions make roadless area protection essential to protecting and restoring trout. In a study of the role of Congressionally designated wilderness in conserving aquatic biointegrity, and sensitive species, researchers found that watersheds containing wilderness scored higher for aquatic biointegrity indicators. This study used road density among other factors as a measure of predictors of biointegrity; citing other studies that suggest that scientists can actually use roads as a catchall human disturbance indicator. Bull trout are exceptionally sensitive to direct, indirect, and cumulative road effects. Bull trout strongholds occur in areas with road density of about 0.4 miles per square mile of land area, but when road density increases to 1.7 miles per square mile bull trout are not found. The study found that wilderness areas are important areas of biointegrity in western Montana and given their importance and rarity, unprotected areas with good aquatic biointegrity merit permanent protection.

Further, recent studies have shown that the majority of isolated populations do not have adequate space for their long-term persistence. Scientists have estimated that, to maintain a cutthroat population in the long term, cutthroat might need two to twelve miles of occupied stream habitat. Few populations are left that occupy this much habitat. Existing populations are at short-term extinction risk from fires, floods, toxic spills, and non-native fish stocking.

High quality habitat for most trout populations is rare. High quality habitats in roadless areas are like islands in an ocean of degraded habitat. (Organization, Laramie, WY - #A30488.54110)

#### **TO PRESERVE TROPHIC WEBS**

The more habitats we destroy for all the animals living here the less chance they have to survive. Even small insects who get overlooked, if their habitat goes, then what will the birds, frogs and fish eat? We have the power and the obligation to help protect these ecosystems. (Individual, No Address - #A3887.50510)

Numerous studies in the rainforests of South America have shown the problems that occur when forests are fragmented. Intrusion of non-forest plant species and decreases in viability of animals at the top of the food chain are the two most obvious examples. (Individual, Tulsa, OK - #A1324.50520)

### **654. Public Concern: The Forest Service should preserve fish and wildlife habitat as a priority.**

PRIORITY IS THAT WILDLIFE HABITAT BE PRESERVED! (Individual, No Address - #A584.50000)

#### **BY REDUCING THE EFFECTS OF HUMAN ENCROACHMENT ON WILDLIFE HABITAT**

In these times of massive land development for urban use, it is clearly becoming a problem for a vast amount of wildlife. If this is not controlled in some areas where the wildlife can remain in its own (not intruded upon and changed for human use) natural environment then they simply do not stand a chance. So many people are against hunting and fishing and the numbers grow day by day. There is so much energy spent on saving this or that species but only as long as it does not impede human interests i.e.: money, huge fancy houses that are just show pieces of the rich (who do not appreciate wildlife anyway), resorts or anything that revolves around making a lot of money. (Individual, Billings, MT - #A4210.53000)

Human development of land here is fast deteriorating terrestrial and aquatic wildlife habitat. (Individual, Eagle River, WI - #A844.53000)

#### **BY AVOIDING DEVELOPMENT OF WETLAND SITES**

. . . Stop developing on wetland sites. These have become bird and animal sanctuaries near our cities. (Individual, Fort Wayne, IN - #A479.10111)

#### **BY RETAINING STANDING DEAD AND DOWNED TREES**

Studies recognize the benefits from standing and downed dead trees left by insect infestations. These trees provide food and shelter for wildlife. They form fish-spawning filter water for downstream use, and fertilize soils for future generations of forest life. (Individual, Missoula, MT - #A17952.60200)

Woodpeckers thrive in snag trees, naturally occurring in forests. Salamanders like the cool, rotting logs often found throughout undisturbed forests. (Organization, Washington, DC - #A22129.60200)

#### **BY ADDRESSING LANDSCAPE-SCALE HABITAT NEEDS FOR WILDLIFE**

Maintaining the population viability of far-ranging forest carnivores (including the grizzly bear, gray wolf, wolverine, fisher, pine marten, lynx, goshawk, etc.), reveals the need to consider landscape scale habitat needs. Core areas of relatively undisturbed habitats must be maintained. Linkages with other core areas must be established, providing sufficient habitat components so the linkages, or corridors, are functional for genetic interchange. Both core areas and linkages must be the focus of watershed rehabilitation and recovery . . . (such as road removal). Buffer zones around core areas must also be recognized in their contribution to habitat needs for these wildlife species. (Organization, Missoula, MT - #A613.53100)

#### **BY PROVIDING WILDLIFE CORRIDORS BETWEEN ROADLESS AREAS**

The USFS and other federal departments should work at establishing corridors between roadless areas to allow for wildlife and plant species to migrate between protected areas. (Association, Bonners Ferry, ID - #A20858.50520)

#### **BY PROVIDING WILDLIFE CORRIDORS IN EXURBAN AND SUBURBAN ZONES**

I ask that wildlife corridors in exurban and suburban zones be actively promulgated by the Forest Service. (Individual, Valley Center, CA - #A4316.53100)

#### **BY PROTECTING CRITICAL WINTER AND MIGRATORY RANGE**

Please also work to increase and enhance critical wintering and migratory habitat for our game animals. Urban and suburban sprawl takes an increasing toll of these critical areas each year. (Individual, Monument, CO - #A5764.53100)

#### **BY INCREASING ELK FORAGE**

Elk related business is a major economic contributor to Idaho. Our significant decline in Clearwater Basin elk population levels is tied directly to a lack of active forest management in the Basin. The creation of elk forage must come through proactive forest management utilizing the full range of forest management tools (timber harvest and burning) across the full breadth of the lands. (Organization, Moscow, ID - #A15318.53300)

#### **BY PROTECTING HIGH VOLUME CREEK HABITAT**

It is common knowledge that high volume creek bottoms and valleys also provide the best habitat for deer, salmon and other wildlife. Remaining areas should be kept roadless to protect these wildlife habitats. (Individual, Sitka, AK - #A15246.53100)

#### **BY IDENTIFYING AND MAPPING CRITICAL SALMON HABITAT**

Fast track a watershed analysis system to identify salmon stream habitat, as fisheries in Alaska is a tantamount economic, subsistence, and recreational resource many of us utilize. Identify and map "critical habitat," the land essential for the survival of the species. Use this identification to design a

strategy plan for wildlife protections while using alternative logging practices to minimize impacts. (Individual, Pelican, AK - #A26552.50000)

**BY DIVERTING FUNDING FROM STOCKING EFFORTS TO HABITAT RESTORATION AND ENVIRONMENTAL POLLUTION PREVENTION EFFORTS**

The forest service should continue with the restoration of fish habitat. Healthy stream and lake environments will promote strong and sustainable fisheries. Funding should be diverted from stocking efforts and placed on habitat restoration and environmental pollution prevention efforts. (Individual, Beverly Hills, MI - #A4756.50100)

**BY COMPENSATING CITIZENS WILLING TO SET ASIDE THEIR LAND FOR HABITAT**

. . . we can utilize PERC's recommendations, compensating Americans willing to set aside their land for habitat. "Market-oriented solutions are offered in the areas of endangered species, national monuments, grazing rights, recreation fees, and water management." (Individual, Jefferson, OR - #A777.54100)

**BY ALLOWING CONTINUED MAINTENANCE OF WILDLIFE HABITAT IMPROVEMENTS**

While we are disturbed and disappointed with the final rule adopted on January 11, 2001, we hope that the USFS will manage inventoried roadless areas to allow the continued maintenance of wildlife habitat improvements. Wildlife habitat improvements, especially wildlife openings in areas of extensive forestland, represent considerable investment of public resources by the VDGIF and the USFS. The areas not only provide important foraging habitats for white-tailed deer, black bear, and wild turkey, but also provide opportunities for the public to see the species. (State Agency, Richmond, VA - #A6048.53100)

**655. Public Concern: The Forest Service should provide habitat for umbrella species.**

Forests should be managed to provide habitat for game animals and umbrella species, and to provide a quality outdoor experience for many. Near-roadless areas have their place, but making Forest Service lands inaccessible to a substantial number of people should not be a policy of the Forest Service. (Individual, No Address - #A16447.50000)

**656. Public Concern: The Forest Service should provide natural habitat for wolf and fox.**

Allow wolves and foxes in natural habitat. (Individual, Atlanta, GA - #A873.53100)

**657. Public Concern: The Forest Service should address the loss of habitat through canopy closure.**

We are concerned that the presence or absence of roads in an area will overshadow the appropriate consideration of other values such as healthy forests and wildlife habitat. As an example, if an area is inaccessible for management, there may be a significant loss of important wildlife habitat through canopy closure. (Association, Portland, OR - #A19004.30200)

**THROUGH THE FOREST PLANNING PROCESS**

If an area is inaccessible for management, there may be a significant loss of important wildlife habitat through canopy closure. At the forest plan level, the analysis must consider these changes in wildlife habitat versus the need or desire to keep the area inaccessible. We do not feel that such analysis and consideration of site specific impacts can be done at the national level. (Association, Salem, OR - #A21754.45500)

**658. Public Concern: The Forest Service should prevent habitat fragmentation.**

**BY PROTECTING ROADLESS AREAS**

Looking at the whole picture, the least damaged public lands should be preserved in blocks large enough to preserve the native plants, animals and fish of the United States. A strong roadless areas will do this. I

can move and survive fine in another area. Marbled Murrelet, Northern Spotted Owls and Coastal Coho can't. (Individual, Deadwood, OR - #A881.50500)

#### **BY ESTABLISHING ROADLESS AREAS WHERE THE GREATEST CONNECTIVITY CAN BE ACHIEVED**

The current pattern of roadless areas is of course an artifact of chance, not of conscious design. In consequence, many ecologically important areas and types are under-represented or un-represented in the current universe of roadless lands (both inventoried and uninventoried). Even a policy that thoroughly protects all existing roadless areas will fail to achieve substantial and obvious ecological and biological benefits because no consideration will have been given to where the roadless areas *ought* to be. The ecological limitations of the current pattern of roadless areas can be remedied in part by creating new roadless areas where they are needed most - in the highly functional areas but lightly roaded areas, and in the areas where small amounts of road removal can achieve vast increases in connectivity. There are many such areas. In cooperation with our colleagues, Pacific Rivers Council has mapped areas of high aquatic integrity in much of the national forest system (including the Columbia Basin, the Sierra Nevada, and the Southern Appalachians) this has shown that protection of the existing pattern of roadless areas will only partly protect the remaining high quality diversity areas, since many high quality areas have been lightly compromised by roads. (Business, Coarsegold, CA - #A1589.50520)

#### **BY PROHIBITING ROAD BUILDING**

As is true of all ecosystems, high elevation ecosystems such as those in the Gunnison Basin-forests, shrub steppe, meadows and others-are easily damaged by human activity. In particular, ecosystems are damaged when the habitat they contain is divided into smaller fragments. The building of roads is a major cause of fragmentation. Fragmentation disrupts natural ecological interactions among species, as my research and other research at RMBL and elsewhere shows. The building of roads also damages ecosystems by serving as an entry for alien species to invade. Fragmentation and biological invasion are very serious threats in our area, as BLM and USFS scientists clearly recognize as well. (Individual, Crested Butte, CO - #A3696.50100)

Science uses a word that denotes ecosystem death and destruction: fragmentation. Slicing and dicing an ecosystem into smaller parcels because of building roads causes the instability and death of an ecosystem, or FRAGMENTATION. Our forests are not merely trees and landscapes; they are Earth's ecosystems. "Man cannot live without ecosystems". Our living Earth is alive because of ecosystems. Man breathes, drinks fresh water, has food to eat and crops to grow because of Earth's ecosystems. Every aspect of life on Earth is governed by strict natural laws that are structured by Earth's ecosystems. Ecosystems maintain and govern the atmosphere and the climate. Earth's populations of viruses and bacteria, in the food chain with man, are also checked and balanced by ecosystems, or Earth's natural wild places and things, that is, our roadless forests that denote inherently life and stability. Any form of human intrusion inherently kills an ecosystem. Each native animal, bird, planet, and tree that evolved within an ecosystem holds down a job for that entire system. Birds, salamanders, frogs, and lizards are an ecosystem's natural pest control system. The protectors and champions of the ecosystem. Every tree removed or killed to build a road, destroys a member of the work force of the ecosystem and the home and cover and shelter of its native species. All native trees and plants and all native animals are the strands in the virtual web of all life. (Individual, No Address - #A609.50510)

#### **TO REDUCE AGGRESSIVE ANIMAL ENCOUNTERS**

The continued fragmentation of these areas leaves wildlife isolated and leads to the extinction and/or more frequent altercations with the more aggressive inhabitants, black, brown and grizzly bear. (Individual, Mohawk, NY - #A3753.50510)

I have a hard time dealing with people saying that wildlife is becoming more aggressive. It's no wonder why they might. They are being driven from their homes and forced into our backyards. . .places that are fearful to them as they aren't used to it. . .{and worse, into the roadways only to die} all for the sake of mining and constant building to compensate for a growing number of people. Wouldn't you be a little aggressive if someone came in and took away the only home you have? (Individual, Sarasota, FL - #A1339.53100)

**659. Public Concern: The Forest Service should provide a brochure that identifies prime habitat in all states.**

There should be a brochure to identify to preserve prime habitat in all states. (Individual, Raleigh, NC - #A11420.14100)

*Effects of Activities/Disturbance on Wildlife Habitat*

*Positive Effects*

**660. Public Concern: The Forest Service should allow various activities due to their positive effects on wildlife habitat.**

**LIMITED TIMBER REMOVAL**

I am a professional, wildlife biologist now writing a part of a Status Assessment for an endangered species that occurs in National Forests in eastern U.S. For the sake of this species, I would prefer to see some management option allowing very limited clear-cutting in some of the areas which might become roadless. (Individual, Ithaca, NY - #A416.53200)

Instead of logging roadless areas, open up logging in those forests with environmentally sensitive techniques that leave some timber but clean out the old timber growing too dense to provide suitable big game habitat. (Individual, Idaho Falls, ID - #A4337.53300)

**THE USE OF FIRE OR SOME OTHER MEANS TO CLEAR OUT OLD GROWTH**

If the small companies who lease timber rights are also used to clear dead brush from the areas where they are working, this will reduce the fire hazard. This brush clearing should also be required of neighbors and inholders. An area that I am familiar with is the San Bernardino National Forest. I can remember reading newspaper articles about how there weren't very many deer there anymore and, while the Forest Service was trying to blame this on people, the article stated that the manzanita brush that the deer feed on was so old and woody that the deer couldn't eat it. After about three years of growth, this brush becomes so tough that it might as well be ironwood. If this brush isn't cleared off in one way or another, there aren't going to be any deer because they can't survive without feed. Nature takes care of this problem by fire, but you people try to put out fires as soon as possible and that means that there must be another way to clear out the old growth in order for new growth that deer can feed on can appear. (Individual, No Address - #A8252.30500)

**DREDGING**

They did a study about the damage that dredging does to streams and rivers and found that it was beneficial to the fish. A dredge picks up the overburden first and then puts the gravel on top of it, which makes it much easier for the fish to use the gravel to make their nests. And many fresh water fish do build these gravel nests to put their eggs in. (Individual, No Address - #A8252.54100)

**661. Public Concern: The Forest Service should recognize the beneficial impacts of timber removal, grazing, and road building on wildlife habitat.**

Wildlife habitat: good logging and grazing practices can ensure the varied landscape necessary to support abundant wildlife and many species. Roads can help hunters access areas to help maintain healthy populations. Fires destroy large expanses of habitat. (Individual, McCall, ID - #A29305.53100)

**662. Public Concern: The Forest Service should allow even age management.**

**TO MAINTAIN HABITAT DIVERSITY**

I believe that some clear-cutting should be allowed in order to maintain habitat diversity and to support species of disturbance ecosystems. This exception . . . should amount to a small percent of the roadless areas, perhaps 5% per century. (Individual, Ithaca, NY - #A27558.50100)

## Negative Effects

### 663. Public Concern: The Forest Service should prohibit various activities due to their negative effects on wildlife habitat.

#### ALL ACTIVE MANAGEMENT ACTIVITIES

Stop destroying wildlife habitat for putting houses in them. Everything needs a place to live, not only people. And the addition of urban things into forests will pollute America even more than it already is. (Individual, Flushing, NY - #A11503.50000)

Activities such as logging, road building, suction dredge mining, and motorized recreation need to be prohibited from roadless areas to improve protection of salmon and steelhead populations and reduce the risk of extinction. Existing wilderness and adjacent roadless areas provide de facto salmon refuges for geographically distinct populations of steelhead trout, Chinook salmon and cutthroat trout in the Siskiyou National Forest. Populations of Coho salmon may be found associated with smaller, isolated roadless areas 1,000 acres or less. Spring Chinook and summer steelhead are found associated with roadless areas in the Siskiyou, Klamath and Six Rivers National Forest. The Klamath/Siskiyou region has the largest concentration of undamaged rivers outside of Alaska. These undimmed rivers and creek support native, naturally reproducing salmon and steelhead. Roadless areas are seldom stocked with artificially produced salmonids thus promoting genetic integrity. Activities such as road building, commercial logging, salvage logging, heavy handed fire suppression, suction dredging, home building associated with mining, water withdrawals for mining, fish stocking, ski area expansion, and access with motorized vehicle have negative impacts to salmon and steelhead and should be prohibited. Forest managers often allow these activities to occur by claiming the impact is negligible. Cumulative impacts, which eventually become significant over time, are rarely taken seriously. The result is a degraded ecosystem with reduced production of salmon and steelhead. (Organization, Cave Junction, OR - #A17235.54200)

#### ROAD CONSTRUCTION

I am particularly concerned about the proposed Finger Mountain sale in Tenakee Inlet. The area in Goose River where road building is proposed is a high salmon producing spot and waterfowl feeding area. Bears, deer mink and marten also frequent that area. Prohibiting roads would save this important habitat. (Individual, Tenakee Springs, AK - #A5143.53100)

#### THINNING

I am 60 years old and I can remember when the deer were very plentiful in the area of the Ochoco National Forest. I am planning on hunting this area next week and am wondering if I will find more forest thinned when I arrive. I believe thinning of the forest and making them look like a huge park has destroyed more habitat for deer and elk than anything else. The land looks the same but the forest is left without any cover for these animals to hide and bed. It used to be the policy of the National Forest to leave the north slopes with the original cover so the deer and elk would have a place to hide and bed and signs were posted stating this. Last year I found one of these signs posted on a tree and it made me laugh inside. Somewhere along the way the USFS has decided we need the forest cleared of undergrowth and denuded of natural growth. I don't know why this policy was reversed but I think it should be given consideration again. I know the area that I hunt has been thinned three times in the past 7 yrs. and the deer and elk are not as thick as they were. This is an area that has road closures and is being managed by ODFW, USFS, and Rocky Mountain Elk Foundation for better game habitat. I think these groups should look at this thinning issue a little more closely. (Individual, Forest Grove, OR - #A6045.53300)

#### MINING

I live in Florida, where mining of phosphorous and other minerals is taking away a precious "home" for wildlife in the Everglades. I have a hard time dealing with this thought, especially when I know that it's cheaper for us to buy these minerals from outside countries due to their failing economies, than it is for us to mine them right out of our own state. (Individual, Sarasota, FL - #A1339.53100)

**664. Public Concern: The Forest Service should address the negative effects of log transfer facilities on aquatic habitats.**

Road building and subsequent clear cutting have also resulted in hundreds of log transfer facilities through Southeast and South-central Alaska. Bark from logs deposited into Alaska's inland marine waters covers thousands of acres of near-shore habitat. In many bays, fish and invertebrate habitat and important crab fisheries have been adversely affected because of this activity which is a direct result of road building and high volume timber sales. Many log transfer facilities are on the Clean Water Act [section] 303(d) list of impaired water bodies and probably will remain on the list until an active program is implemented to clean up these sites. Bark in large quantities does not seem to decompose or wash away passively. (Individual, Juneau, AK - #A23242.54100)

**665. Public Concern: The Forest Service should address the negative effects of roads on wildlife habitat.**

**ON AMERICAN MARTEN**

Marten (*Martes americana*) are widespread in the Tongass National Forest, and are an important furbearer. Density of roads has been found to affect the quality of habitat for marten where there is potential for overtrapping. A habitat capability model developed for evaluation of marten habitat on the Tongass National Forest predicts declines in marten densities at road densities as low as 0.2 miles per square mile, and population declines of 90 percent where road densities approach 0.6 miles per square mile. (Permit Holder, Juneau, AK - #A23220.50000)

**ON BEAVER**

As a resident of an area surrounded by national forests, it is the roadless areas that I most cherish. The areas with roads have lost their scenic values due to logging. The huckleberry patches have been destroyed, never to return in my lifetime. The elk calving areas are gone. The nests of goshawks and other forest raptors have been lost. In areas where there are roads but no commercial logging, firewood gathering and associated activities have vastly reduced the quality of the forest—one finds skid tracks, non-native vegetation, litter, and the lack of snags and woody debris so essential to many kinds of wildlife. The rich humus from decaying logs is not present, reducing the vitality of plant communities. Hydrological processes, including beaver populations, with their capacity to create and restore wetlands, have been disrupted and degraded by roads and associated development. (Individual, Victor, ID - #A20625.45100)

**666. Public Concern: The Forest Service should close roads after timber removal.**

**TO PROTECT WILDLIFE HABITAT**

I live in the center of the GMUG forests and all are in serious climax situations due to fire suppression. This has led to the decline of our deer herds in Colorado. Additional travel corridors will only make the situation worse. If areas need to be harvested for habitat improvement I support that as long as roads are closed on completion of timber harvest. (Individual, Delta, CO - #A4287.5300)

**667. Public Concern: The Forest Service should address "edge effects" on songbird populations.**

Excessive logging roads have harmed much of the wildlife by making too easy access for humans and allowing decreased songbird survival by the now well understood "edge effect". (Individual, Cheney, WA - #A6154.53000)

There is some indication that unroaded tracts of forests 1000 acres or less can provide enough interior habitat to suit at least some interior birds, which is one of the reasons parcels of this size should receive immediate protection under roadless policy. (Organization, Washington, DC - #A22129.45320)

## Threatened and Endangered Species

### Summary

**General Comments** – A number of comments regarding threatened and endangered species suggest reasons for and methods to protect these species. People request that the Forest Service protect roadless areas as habitat for endangered species, specifically for the spotted owl, bald eagle, and grizzly bear. Some suggest that protecting roadless areas would prevent costly listing of species under the Endangered Species Act (see also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Endangered Species Act*). An organization requests that the Forest Service manage roadless areas in accordance with the Canada Lynx Conservation Agreement. Others ask that the Agency address habitat improvement for threatened and endangered species in forest plans.

Some assert that management of endangered species requires access. The Forest Service, some say, should not designate roadless areas in endangered species habitat because access is needed to accommodate fuel reduction projects and fire fighting. Additionally, a few respondents say that species extinction is a natural occurrence and assert that the Forest Service should not take special steps to protect endangered species.

**Effects of Activities/Disturbance on Threatened and Endangered Species** – Several respondents suggest activities which, they claim, would help protect endangered species. One individual suggests that the Forest Service should permit wildlife rescue operations in roadless areas because roadless designations may prevent such rescues of endangered species. Another individual suggests that the Forest Service relocate endangered fish species during times of drought. While some respondents conclude that certain disturbances are beneficial to endangered species—such as flooding for salmonids—others assert that the Forest Service should consider the negative impacts of various activities/disturbance, such as roads, timber removal, and wildfire, on threatened and endangered species.

### *Threatened and Endangered Species General*

#### **668. Public Concern: The Forest Service should protect roadless areas.**

##### **AS ENDANGERED SPECIES HABITAT**

We do not have the remotest idea what the consequence will be when a species becomes extinct as a result of human actions. Certainly one impact of the demise of the spotted owl is likely to be an increase in the rodent population in that area—which could have very serious consequences. If other species suffer the same fate as a result of this proposed amendment, how will we know what other consequences there might be? (Individual, Bakersfield, CA - #A390.50000)

The main role in my opinion is for endangered animal protection and watershed health. (Individual, Wheaton, IL - #A52.50000)

The obvious and most important benefit is the habitat it would provide for over 1600 rare, threatened, endangered and sensitive species and the benefit to our air, water, and land for future generations of people, families, communities, and wildlife. (Individual, Bellevue, WA - #A637.50000)

We are now on the steeply rising slope of exponential population growth. Humans are pressing out everywhere. Dr. Richard Leakey now says that “between 50,000 and 100,000 species are lost every year.

The current rate of species loss is imperiling the planet” (BBC news 8/24/01). With an ever increasing human population, we must provide an increasing land base of protected areas for natural recreation and research. We must preserve some natural ecosystems while we still can. (Individual, Sitka, AK - #A15506.50400)

South Fork Mountain IRA here in North Idaho, for instance, will already be reduced in size due to Stimson Lumber Company’s ANILCA access easement yet South Fork Mountain and roadless lands to the west on the Colville National Forest comprise extremely important refugia for a host of ESA listed species that are suffering continual assaults on their habitat from motorized recreationists, inholding timber corporations, and fragmentation from numerous activities that inexorably shrink these few remaining islands of viable habitat. it is no accident that their viability as habitat is directly tied to their status as roadless lands.

This example is not unique. If you would look at the grizzly bear management units (CMUs), the lynx analysis units (LAUs) and refugia for bull trout in the south Selkirk Mountains, you would see that all of the best remaining habitat is found in roadless areas. This is surely not coincidence.

While recovery of ESA listed species is not popular with extractive industries, it is the mandate of our public agencies. Unless we wish even more contentious battles in the future over species extinctions, we should take all reasonable steps now to ensure that adequate viable habitat exists and that further listings can be avoided. Roadless areas protection is sound policy and furthermore, it is the will of the American people (to whom these forests belong.) (Individual, Blanchard, ID - #A17249.53200)

We are very concerned that the loss of additional large blocks of forest areas in Washington State could directly contribute to future Endangered Species listings. It would be difficult to estimate the economic costs that could be associated with such potential listings, but in Washington we know from past history that these costs can be tremendous. (Organization, Seattle, WA - #A21904.53200)

#### **AS SPOTTED OWL HABITAT**

It should be noted that after an aggressive timber harvest by the tribe adjacent to the northern boundary of the LNF, a decrease in the Mexican Spotted Owl population in the LNF was observed coincidental with an increase of that species on tribal land. Similar observations have been made concerning the California Spotted Owl. One suspects that the USFWS needs to revise its opinion regarding habitat of the Spotted Owl. (Individual, Ruidoso, NM - #A17775.53200)

#### **AS BALD EAGLE HABITAT**

Please protect the habitat of the Bald Eagle, the symbol of our nation’s freedom and strength. (Individual, North Hollywood, CA - #A19944.53200)

#### **AS GRIZZLY BEAR HABITAT**

As fragmentation and degradation of habitat expands, more populations are forced to assume metapopulation structures. Metapopulations are assemblages of local populations sustained by a balance of extinction and colonization (Hanski 1994; Hanski and Gilpin 1997). Metapopulation viability is maintained through the migration of individuals between patches of habitat. It is essential that large patches of core habitat, such as that provided by roadless areas, be protected. Habitat fragmentation may result in smaller and more isolated wildlife populations, particularly for species such as Grizzly Bears with demanding habitat needs. Smaller populations are more vulnerable to local extinction, due to stochastic events (Gilpin and Soule 1986). Smaller populations are also more susceptible allowing for the replenishing of populations and expansion of the gene pool (Noss 1983, 1987, 1992; Noss and Harris 1986; Craighead and Vyse 1995; Paetkau et al. 1997; Beir 1993). Fragmentation may substantially alter the microclimate of forests edges as well as interiors (i.e. radiation, wind, and water fluxes). (Organization, Missoula, MT - #A613.53110)

I write to you to protect grizzly bears and their babies and their habitat. One of the best ways you can do this is to implement the Forest Service’s historic rule to protect roadless areas in our national forests.

Along with more than one million other Americans who commented on this policy, I strongly support the protection of wild places and wildlife like the grizzly. (Individual, Stillwater, MN - #A5162.53100)

I strongly support the protection of wild places and wildlife like the grizzly. (Individual, Portland, OR - #A1583.53000)

#### **TO PREVENT COSTLY LISTING OF SPECIES UNDER THE ENDANGERED SPECIES ACT**

The Wyoming Range is a spectacular forest with Canadian lynx and Bonneville cutthroat trout—two wildlife species that are very sensitive and imperiled. We need to protect the last remnants of unroaded country in Wyoming to maintain habitat for these unique species. In fact, there are over 110 wildlife species at-risk in Wyoming that need the undeveloped, lower altitude, roadless areas forest for their survival. Listing and ensuring the protection of these species under the Endangered Species Act would cost Wyoming millions of dollars. It would be better we maintain the roadless areas as pristine, providing habitat for wildlife, than allowing the expensive development of wild forests to the detriment of our wildlife. (Individual, Jeffrey City, WY - #A27115.53000)

#### **669. Public Concern: The Forest Service should manage roadless areas in accordance with the Canada Lynx Conservation Agreement.**

We would like to point out that on March 1, 2000 the National Forest Service signed the Canada Lynx Conservation Agreement” agreeing that the assessment and strategy were acceptable and would be followed. Because of the priority to manage corridor as a healthy eco-system and encourage movement of species such as the Canada lynx, I feel that the NF recognize the extreme importance of roadless lands as a potential “safe area” for species. McKelvey et al. (2000d) argued that a system of reserved embedded in a fragmented and non-natural landscape would be sufficient to sustain lynx populations. Rather, a strategy that encompasses the entire landscape may be necessary. Conservation Assessment and Strategy recommends that “refugia” be created to encourage the return of this threatened species. Refugia are large, contiguous areas encompassing the full array of seasonal habitats, in which lynx are present or occurred historically, and where natural ecological processes predominate. Refugia must be relatively secure from human exploitation, habitat degradation, and substantial winter access. Refugia should be sufficiently well connected to permit genetic interchange within and between geographic areas. We believe that many of the roadless areas in conjunction with now existing wilderness areas are the only prime “refugia” possibility available within the north-south wildlife corridor. Most lynx occurrences (83) were associated with Rocky Mountain Conifer Forest, and most (77%) were within the 1,500-2000 m (4,920-6,560 ft) elevation zone (McKelvey et al, 2000b). These statistics enforce the roadless area habitat as being critical. A wide variety of factors have influenced lynx status. These include excessive legal and illegal trapping, extensive timber harvest, habitat modification, thinning, slash treatment, brush control, pesticides, herbicides, livestock grazing, fire suppression, forest maturation, catastrophic fires, recreational use, patchiness of suitable habitat, geographic isolation, prey availability, competition with other carnivores. (Organization, Logan, UT - #A15400.53200)

#### **670. Public Concern: The Forest Service should address habitat improvement for threatened and endangered species in forest plans.**

The current roadless area conservation rule allows for activities that would help create habitat for threatened and endangered species or maintain/restore historical ecosystem composition and structure. Specifically, the rule allows for timber management designed to *(I) improve Threatened, Endangered, Proposed, or Sensitive species habitat, or (II) to maintain or restore the characteristics of ecosystem composition and structure.* We believe it is important to specify in the Forest plan—to the extent possible—in which roadless areas these exemptions would apply. The Forest plan should also outline what activities would be needed to create the habitat for the T and E species or would maintain/restore desired ecosystem composition and structure. This outline should provide sideboards for any projects that might be proposed later. (Civic Group, Roanoke, VA - #A1713.50510)

**671. Public Concern: The Forest Service should not designate roadless areas in endangered species habitat.**

I would recommend that you do not have roadless areas where endangered species exist. Road access could provide for fuel reduction projects and fire fighting access in order to save the habitat. (Individual, Leavenworth, WA - #A6617.53200)

Access is the foundation for all management activities on our public lands. Lack of access to unroaded areas prevented spotted owl census takers from truly measuring populations effectively. Spotted owl populations were inaccurately counted resulting in decisions that were not based on solid science. Take a look at the maps showing spotted owl nest locations. Few locations are very far from existing road systems. Census takers did not have access and spotted owl populations were inaccurately counted. Bad decisions resulted. (Individual, Springfield, OR - #A15730.53200)

**672. Public Concern: The Forest Service should recognize that species extinction is a natural occurrence.**

I know that the fate of greater than 90% of the species which existed upon this earth was extinction. By attempting to protect endangered species, we are interfering with the natural process of evolution, e.g., the Darwinian principle of mutation plus survival of the fittest. (Individual, Jackson, WY - #A29552.53200)

And [land use restrictions] don't mean let some "taxonomist" turn a variant into a separate "species" to protect some land some "environmentalist" wants to keep everyone off. Use some common sense and recognize that some animals go to the edge of their range, and then die. Allowing a state or government to declare an endangered species because an animal is beyond their normal range is BS. Genetic diversity is not the be-all and end-all of reasons for existence. Natural selection means some animals will die out. It's nature's way. And environments change without man, resulting in extinction. So let's use some common sense here. (Individual, Centerville, OH - #A27001.50200)

*Effects of Activities/Disturbance on Threatened and Endangered Species*

**673. Public Concern: The Forest Service should permit wildlife rescue operations in roadless areas.**

**TO PROTECT THREATENED AND ENDANGERED SPECIES**

Roadless designations diminish/prevent wildlife rescue operations of the very species mandated for protection. Including us. (Individual, Santa Ysabel, CA - #A26392.91110)

**674. Public Concern: The Forest Service should prohibit hunting of threatened or endangered species.**

The following activities should be completely prohibited in roadless areas: . . . hunting of threatened or endangered species . . . (Individual, Port Angeles, WA - #A6179.90110)

**675. Public Concern: The Forest Service should relocate endangered fish species during times of drought.**

The lack of water in Klamath Basin is killing deer, birds, etc. Cannot the shortnose suckerfish be relocated in ponds where the water is abundant, such as my area, Jefferson, Oregon? I know of many large ponds. If the lake had no water, you would relocate the shortnose suckerfish until the lake once again has enough water to sustain the environment. The Cohn salmon could be relocated until the river is at its normal depth next year or the year after; rather than exchange the death of 100,000 other species by denying them water in order to keep the river full of water in order to save particular species. (Individual, Jefferson, OR - #A777.54100)

## Positive Effects

### **676. Public Concern: The Forest Service should recognize the importance of flooding to salmonids.**

The environmental and ecological values of these areas are already well known. To the extent unfragmented forest habitat still exists in the United States, it exists in the Inventoried and Non-Inventoried Roadless Areas under Forest Service management, within designated Wilderness areas, and in some National Parks. This small remnant of our once vast natural forests is all that remains. The unfragmented forest landscapes provide the best hope for the retention and restoration of wide-ranging carnivores (like grizzly bear, wolf, lynx, wolverine, fisher, and pine marten) within the United States. These areas also provide the last and best opportunity to study natural processes (windthrow, flooding, wildfire, and insect outbreaks) operating within large landscapes. While these natural processes may be locally destructive, they serve the intricate web of species dependent upon them. To cite but one example, flooding—while potentially destructive in the short term—is absolutely essential to the long-term survival of salmonids in Pacific coast streams. Floods remove silt, transport various sized rocks necessary for replenishment of spawning gravel, and create off-channel sloughs where juvenile salmon can feed and escape predators. The Forest Service has a critical role to play in preserving this and other system-wide natural processes—and the species dependent on these processes. As a necessary first step, the protection of roadless areas significantly advances this goal. (Individual, Seattle, WA - #A11805.50000)

## Negative Effects

### **677. Public Concern: The Forest Service should consider the negative impacts of various activities/disturbance on threatened and endangered species.**

#### **ROADS**

Roads encourage poaching, and incidental road kills of protected or endangered species. (Individual, Seattle, WA - #A8810.90130)

#### **TIMBER REMOVAL**

Significant threats abound to this nation's threatened and endangered wildlife, and recovery prospects too often depend on existing roadless areas for their very significant habitat values. Here in North Idaho and Eastern Washington, for instance, timber companies are already encroaching into some of the last redoubts for several ESA listed Threatened and Endangered species. Often, the only viable habitat remaining is found in roadless areas that are typically surrounded by miles of roads and clearcuts. Past Forest Service and timber corporation logging and road building has led to these highly fragmented landscapes. As a result of rampant corporate logging and the Forest Service's legacy of "multiple use", Agency Biological Assessments increasingly are finding that further activities will be likely to "adversely affect" numerous Threatened and Endangered species like grizzly bear, mountain caribou, Canada lynx, gray wolves and bull trout. (Individual, Blanchard, ID - #A17249.50000)

Logging may cause soil erosion that may lead to landslides and siltation of salmon-spawning streams. For specifics, guess where the best salmon-spawning habitat in Eastern Oregon is located. In my backyard—the North Fork John Day River, flowing through a wilderness and several nearby roadless areas. For the most part, our National Forest roadless areas are the healthiest forests we have. (Individual, Bates, OR - #A15564.54200)

#### **WILDFIRE**

It is hard for me to believe that all rare species occur only on private property. If we do not protect these from fire in our forests, how do we require private property owners to take extraordinary measures to protect them? (Individual, Loveland, CO - #A7090.30400)

## Vegetation and Botanical Resources

### Summary

**General Comments** – Those who address the topic of vegetation and botanical resources request that the Forest Service provide protection to these resources, especially by protecting roadless areas and old-growth forests. Respondents suggest that protecting roadless areas would serve to prevent the spread of invasive species, protect endemic plants, and allow old growth to return. People ask for the protection of old-growth forests for ecological values, to compensate for global losses of old growth, to help lessen global warming, to preserve biodiversity, and to protect against natural disasters. Some respondents assert that old-growth forest protection is warranted because old growth is not replaceable and because that is what most citizens want. Others state that the Forest Service should protect forests to prevent single-species monocultures.

**Species-Specific Considerations** – A few respondents comment about specific botanical species. One individual requests that the Forest Service protect black spruce while another wants the Agency to maintain or increase the amount of aspen forest. Others request that the Forest Service protect lower elevation hardwood forests, plant more oak trees, and discontinue the practice of replacing hardwoods with pine.

**Effects of Activities/Disturbances on Species** – One individual suggests that the Forest Service should manage vegetation with longer harvest rotations. A few respondents suggest that certain activities are beneficial to vegetation resources. Some believe that selective timber removal encourages the growth of young trees while others conclude that thinning second growth trees promotes old-growth characteristics. One individual proposes even-age management as a method for regenerating even-aged forests.

A number of respondents state that roads have negative effects on vegetation. Some comment that roads allow the introduction of invasive species, while others discuss the effect of roads on rare plant species. One individual suggests that the Forest Service should consider the role of animals in spreading noxious weeds. (See also Chapter 6: Protecting Forests (Question 3): Roads/Access, Timber Harvest, and Insects, Disease, and Noxious Plants.) Others believe that tree farms and livestock grazing have negative effects on vegetation resources.

### *Vegetation and Botanical Resources General*

#### **678. Public Concern: The Forest Service should identify the vegetative cover affected by the Roadless Area Conservation Rule.**

I appreciated the July 10 Federal Register notice's having given the summary facts, but still don't know certain key facts involved. We know that the January 12 rule effectively "saved" from logging and roadbuilding only the 9 million acres of timberland classified as CAS timberlands in existing forest plans. Are all 9 million acres pristine old-growth forest? (Since many of them are in Idaho and I just finished reading Stephen Pyne's new book about the 1910 Great Fires, I gotta ask.) Are the other 47.5 million acres of inventoried roadless lands ancient forests? I doubt it. If this initiative is not about "saving" 58.5 million acres of pristine old-growth forests from logging and roads, how much pristine old-growth is it about? What's the rest of the vegetative cover? (Individual, Quincy, CA - #A30023.14140)

**679. Public Concern: The Forest Service should protect roadless areas.****TO PREVENT THE SPREAD OF INVASIVE SPECIES**

Roads and disturbances from logging, and grazing have also increasingly become vectors and corridors for the introduction of invasive non-native plants. We ask that you consider the effects of roadbuilding on the prevalence and spread of invasive species, as well as on the viability of native plant populations. Roadless areas are essential to maintaining the genetic and ecological integrity of our last remaining wild forests. (Association, Kelsey, CA - #A15815.14500)

**TO PREVENT HABITAT LOSS**

As the long-time Forestry Coordinator for the California Nature Plant Society, I am painfully aware of the habitat loss that has taken place on USFS lands, and that is why I feel so strongly about protecting the remaining roadless areas. (Individual, Carmel Valley, CA - #A4741.60400)

**TO PROTECT ENDEMIC PLANTS**

CNPS still fully supports this measure, as we did in 1999 and 2000. The remaining roadless acres in our public forests are the last reservoirs where native plants and wildlife can exist without continuous pressure from intrusions that threaten to erode habitat and threaten their continued viability. Roadless areas in our region are precious public treasures because of their resource values diversity, relatively pristine condition, and aesthetic, scientific, and other resource values that make them irreplaceable, and their protection a necessity. The Klamath-Siskiyou ecoregion, for example, contains the greatest diversity of conifer species of any of the world's temperate forests (30 species of conifers). More than 1,800 different species of plants have been documented for this region, of which 131 are endemic and do not occur anywhere else on Earth. Yet, only 10 percent or less of the area is legally protected from logging. (Association, Kelsey, CA - #A15815.45000)

**TO ALLOW OLD GROWTH TO RETURN**

A roadless area helps what is now not an old growth area have a chance to become one. A lot of effort is put into saving old growth and wilderness areas which I feel is a good thing but there are places which can develop naturally back into that state if they are not seen as "up for whoever wants to grab it". (Individual, Crystal, MN - #A23605.60120)

**FOR NATIVE FORBS, LICHENS, AND FUNGI**

DellaSala and Strittholt (1999) have documented the importance of smaller roadless areas, which share many attributes in common with inventoried roadless areas, including:

Source areas for recolonization of native forbs, lichens, and mycorrhizal fungi. (Organization, Ashland, OR - #A20421.45100)

**680. Public Concern: The Forest Service should protect old-growth forests.**

Rather than defend this popular act in court against Boise-Cascade, my government rolled over and greased up. Now it's time for USDA, the stewards of my forest, to defend this dwindling legacy. Even without the Act, you can protect the old growth forests. Please do. (Individual, Bothell, WA - #A639.30100)

I feel our forests are much like Central Park in New York City. When Olmstead designed the park, there was only open land all around. But today such a different sight to behold. And I hope you and the rest of our government could have the same foresight and plan ahead to the time when our forests could possibly be the only natural green space we have left. It'd sure be nice if that green space had mature trees set in their natural state. I'm sure you've been to the Redwood's in California, what a wonderful sense it is walking around them. It would be so nice to let other trees mature around the U.S. in large quantities. (Though of course I know the other trees wouldn't be quite the scale!) (Individual, Brevard, NC - #A151.50000)

### **FOR THEIR ECOLOGICAL VALUES**

To maintain fish and wildlife habitat and forest diversity on the Tongass, the remaining high-volume stands of old growth should be conserved for their ecosystem values. To date, the timber industry has harvested over 70 percent of the most valuable timber stands in Southeast Alaska, which includes both national forest lands and Native corporation lands that were selected from within the Tongass for their high economic value. Protecting the remaining roadless areas on the Tongass will help achieve balanced forest management. In addition, steep rugged terrain makes roads in this region very expensive to construct and vulnerable to erosion and landslides. The ecological risks associated with developing these areas are extremely high and may jeopardize commercial and sport fishing, hunting, tourism, recreation, and subsistence opportunities in Southeast Alaska. These multiple resource values of the Tongass are basic to maintaining and increasing economic diversity, as well as for maintaining the quality of life for people who live in Southeast Alaska. Furthermore, the high costs of road construction and the deficit timber sales on the Tongass do not justify entering the remaining roadless areas. (Organization, Anchorage, AK - #A22992.50100)

### **TO COMPENSATE FOR GLOBAL LOSSES OF OLD GROWTH**

It seems very plausible and acceptable to allocate on a national scale, a larger percentage of federal land as older mature forests to compensate for the mature forest type that has been lost nationwide on private and public lands. It would seem likely that higher percentages than the historic range of variability suggest is needed if mature forest on a local scale should be preserved in order to compensate for the overall huge losses on a national scale. Since private land is susceptible to changing ownership and therefore management, that land base cannot be counted on to provide forest types that may take several hundred years to produce. Therefore, the majority of this older age forest must be maintained in federal reserves. (Individual, Penrose, CO - #A21448.50410)

### **TO HELP LESSEN GLOBAL WARMING**

An important feature of mature or old growth forests that is overlooked in the typical agency analysis is the contribution of these older forest types to carbon sequestration. The accumulation of carbon into the cellulose of trees, downed timber, and forest floor humus is a cumulative event. This type of accumulation increases only over time and older forests hold much larger amounts of carbon than younger forests can. Young forests may hold increasing amounts due to high growth rates but they lack the large amounts of carbon found in dead and downed timber or in the soil horizons that are found in older forests. The large amounts of carbon that are held in older forests serve to keep this carbon from being released into the atmosphere and contributing to global warming. Those forests in designated roadless areas will continue to serve as carbon sinks on a national and global level.

On a national level, the vast majority of mature forest types that contribute most significantly to carbon sequestration especially in the east and Midwest are gone. Since the vast majority of land in the U.S. is private land, and much of that was former old growth woodland that is now converted to mature carbon sink forests. The percentages of forests found nationwide in old growth structural stages is minute compared to that of pre-Columbian times. On a national level, we now are no doubt extremely below the minimum Historic Range of Variability in the older forest structural stages. The Global and hemispheric climate and ecosystems equilibrium developed and was adapted to those conditions where a great deal more carbon remained trapped in mature forests and their resulting soil horizons. The release of this carbon from forests on a national and global level in the last century is considered a major contributor to global warming. . . . Roadless areas designation is a major step in the right direction in our nation doing its part to lessen global warming. (Individual, Penrose, CO - #A21448.50410)

### **TO PRESERVE PLANT AND ANIMAL SPECIES AND GENETIC DIVERSITY**

The last 150 years has seen the relentless destruction of forests and ecosystems at an unprecedented rate. The devastation that resulted from the clear cutting of old growth redwood and Douglas fir forests in the northwest should be a clear lesson to us all. The streams have become polluted to the point that they are no longer support wild fish and populations. Even the climate has changed as a result of the loss of cover of trees that held moisture, and cooled the surrounding area. Animal species that flourish within the protection and shade that the forest provided have disappeared. Bird species that used to move through the upper story of the forest have become isolated because they will not move into the barren stump fields that remain. Plant species that require shade and decomposing parts of the trees are gone as well.

The genetic diversity of seedlings in a fragmented forest may be relatively small indeed. (Individual, Corpus Christi, TX - #A15488.10111)

#### TO PROTECT AGAINST NATURAL DISASTERS

One weakening element to the health of an ecosystem causes susceptibility to others, setting off chain reactions of unforeseen and potentially devastating consequences. This country's trees are in a state of decline. Older growth trees are the strongest—those forests best able to withstand disasters—natural, such as fires, tornados, or hurricanes, and other threats; they also provide a canopy that is an integral part of an ecosystem, that would take centuries to replicate (assuming optimal growing conditions, which is not, unfortunately, the case). (Individual, Piermont, NY - #A28736.60120)

#### BECAUSE THEY ARE NOT REPLACEABLE

The 2001 Montana legislature declared the sole value of the State's old growth forests is as lumber, and that preservation for any other use (ecological diversity, wildlife, etc.) can only be done by paying the stand's lumber value to the State. This opened up logging of fifteen old growth stands just this summer. One federal environmental value should be the preservation of old growth forests, since neither Montana nor the forest industry has any intent of doing so. Fortunately many of the proposed roadless areas are old growth, preserved for over a century of extensive logging and mining. Old growth is not replaceable. (Individual, Lolo, MT - #A111.60120)

We have very little left in the way of old growth forest, especially old growth that has not been compromised in one way or another. What is left should be protected. It cannot be replaced for centuries and, once cut, is not likely to be spared in the future. Please, we have little of our forest heritage left. What is left is precious. Please work for the forest, not deforestation. (Individual, Cherry Hill, NJ - #A1789.60120)

Competing Values-Limited Resources: It should be remembered that a true old growth forest is NOT a renewable resource! Man can destroy pristine old growth forests, but we can not restore one. A second growth into an area of second or third growth is struck by the magnitude of the changes caused by logging—even logging done more than 100 years ago. **TRUE, PRISTINE OLD GROWTH FORESTS MUST BE PROTECTED FOR FUTURE GENERATIONS.** I would hate to think of a time when the only exposure to the glory of a true old growth forest was with virtual reality on a computer. (Individual, Reno, NV - #A5110.60120)

#### BECAUSE THAT IS WHAT THE MAJORITY OF CITIZENS WANT

The reason that the recent Presidential election was so close is that we, the voters, didn't want either Bush or Gore. We, the voters, have repeatedly indicated in polls that we want the environment protected. When there is a candidate who is truly concerned about the environment, that candidate usually wins. Unfortunately, the Republican and Democratic parties are both controlled by the people who give money for election campaigns, and they—a minority—are the ones who don't care about the environment. Please do what we, the voters, want, which is to protect the remaining old growth forests and all our National Forests from unneeded exploitation (that only benefits a greedy and already wealthy few). (Individual, Portland, OR - #A14737.15000)

### 681. Public Concern: The Forest Service should recognize that old growth cannot be preserved.

From a biological point of view, absolutely no living organism can be preserved. This includes an old-growth forest.

*Therefore, how can this country justify setting aside any more lands from timber production?*  
(Individual, No Address - #A25635.60120)

**682. Public Concern: The Forest Service should recognize the value of forest fungi.**

The fungi that live in symbiosis with the forest trees have evolved over millions of years and provide enjoyment and gourmet delights to many of us mushroom hunters. These forest fungi also provide essential nutrition for those mighty trees and underground food webs for hundreds of plants and insects important to the integrity of the forest ecosystem. (Individual, Elizabethtown, IN - #A19017.60300)

**683. Public Concern: The Forest Service should recognize that deforestation leads to desertification.**

Worldwide man has a habit of depleting forests, which gradually leads to desertification. The Mediterranean had chiefly evergreens, oaks, and pines, and Attica was entirely deforested in the 5th century B.C. In Europe, deforestation did not begin until the Middle Ages and by 1862 most of the beautiful forests had vanished. (From Before Nature Dies by Jean Dorst) 75% of forests worldwide have been cleared. 15% of original U.S. forests remain. (www.bhs.berkeley.K12.CA.US/departments/science/APwgs/Killas/deser.htm) 67% of total area of U.S. forest are commercial (www.forestinformat.com) let that be enough! (Individual, Seattle, WA - #A20824.50420)

**684. Public Concern: The Forest Service should protect forests to prevent single-species monocultures.**

**BECAUSE THEY PROVIDE LITTLE HABITAT FOR BIRD AND PLANT SPECIES AND DO NOT DRAW TOURISTS**

Much of the current National Forest is managed to promote the growth of particular tree species. There is nothing natural about a red pine stand, planted row by row. My own research indicates mono-cultural stands provide little habitat for bird and plant species, nor do they draw crowds of tourists to bolster the local economy. The over abundant white-tail deer have also impacted the woody cover and herbaceous layer of the forest. The impact of too many deer is evident in the inability of eastern hemlock and northern red oak to recover to pre-timbering year percentages. (Individual, Eagle River, WI - #A844.60100)

**BECAUSE THEY ARE NOT CONDUCIVE TO SPECIES DIVERSITY**

This protection is especially significant in my area as most privately owned forest here are rapidly being converted to single species pine forest which, as you know, are not conducive to species diversity, in wildlife and obviously in tree and understory species. (Individual, Troy, NC - #A1625.60100)

**BECAUSE THERE IS ALREADY ENOUGH LAND DEVOTED TO SINGLE SPECIES**

As a life-long inhabitant of the Oregon forest land, I know that there is already enough land devoted to single-species tree farms. That small portion of land with a variety of interdependent species which actually constitutes viable and true forest must be preserved as the soul of our land. There is more to life than the dollar. (Individual, No Address - #A3925.60100)

**685. Public Concern: The Forest Service should promote regeneration in previously harvested areas.**

**TO REPLACE VALUABLE TIMBER**

On the Forests where I worked, areas where commercial timber production was considered the most important resource were not managed properly for timber production. Regeneration was not adequate in many areas, or seedlings came in too thickly and stunted at small diameters, creating areas of little value for timber, wildlife or recreation. (Individual, Bozeman, MT - #A5649.65200)

**686. Public Concern: The Forest Service should protect national grasslands.****BECAUSE THEY ARE ENDANGERED AND FRAGMENTED**

I'm particularly concerned about our National Grasslands, vulnerable as they are to off roaders. There are many National Forest wildernesses, both designated and de facto, but grasslands are an endangered and fragmented stepchild. (Individual, Flagstaff, AZ - #A5026.60400)

**687. Public Concern: The Forest Service should recognize that forest cover is increasing.**

I have read that some people believe that our forests and wildlife are on the verge of extinction. Nothing can be farther from the truth. In fact, the forest cover of this country is increasing and has gradually done so during much of the 20th century. (Association, South Hill, VA - #A17035.50000)

**688. Public Concern: The Forest Service should allow local decisionmakers to develop unique approaches to managing successional disturbance.**

The Society of American Foresters, in their publication, *Forest Types of the United States and Canada*, lists 145 different forest types present in the United States. Each of these forest types is defined by a distinct set of species. Different species respond differently to natural- or human-caused disturbances. Early successional species require disturbance to perpetuate. Late successional species are often replaced by early successional species following disturbance. These different responses to disturbance require unique approaches to management, and forest managers need the flexibility to make decisions from a local perspective. (Governor, State of South Dakota - #A23354.13110)

***Vegetation and Botanical Resources – Species Specific Considerations*****689. Public Concern: The Forest Service should protect black spruce.**

Minnesota is suffering a severe lack of reproduction in its black spruce stands. Black spruce usually thrives in lowland swampy areas, like the area around Baldpate Lake. Unfortunately, black spruce is coveted by the timber industry even though the LRMP does not make allowances for such logging.

Black spruce provides valuable habitat for boreal owls, Canada lynx, and other sensitive species. Most of the acreage identified in RARE II is adjacent to the BWCAW and provides a good buffer area for the wildlife that lives in this wilderness area. (Individual, Lake Tomahawk, WI - #A29653.60100)

**690. Public Concern: The Forest Service should increase the amount of aspen forest.**

In the Chequamegon-Nicolet forest where I live I would like to see efforts to maintain if not increase the amount of aspen forest. I realize this means clear cutting but in 1 to 2 years after a cut the regrowth is impressive. (Individual, Phillips, WI - #A801.60100)

**691. Public Concern: The Forest Service should protect lower elevation hardwood forests.**

Large tracts of undisturbed wild forest have great ecological, recreation and spiritual benefits that far outweigh any temporary economic benefits that might accrue from logging these areas. There are too few of these lands left in the Northeast today, and we should preserve those that are left for future generations. In particular, lower elevation hardwood forests are underrepresented in currently protected wild lands on the WMNF. [White Mountain] (Some of the WMNF Wilderness boundaries seem to have been drawn to exclude the valley hardwoods.) (Individual, Lincoln, NH - #A5640.45000)

**692. Public Concern: The Forest Service should plant more oak trees.**

Also need to plant more oak trees. (Individual, Lumberton, MS - #A11159.60000)

**693. Public Concern: The Forest Service should discontinue the practice of replacing hardwoods with pine.**

Money is lost every year by selling NF timber and replacing hardwoods with pine only benefits the lumber producers. Pines have no nutritional value and leach the nutrients from the soil leaving it unproductive for the future. (Individual, Houston, AR - #A4162.65230)

*Effects of Activities/Disturbance on Vegetation and Botanical Resources*

**694. Public Concern: The Forest Service should manage vegetation with longer harvest rotations.**

If we were to manage the forest rather than a tree farm then 250 to 500 year rotations (in Douglas fir) would be the norm rather than 40 to 100 years. It seems to me that long rotations would serve most creatures' needs, including ours. (Individual, No Address - #A14054.60120)

*Positive Effects*

**695. Public Concern: The Forest Service should allow selective timber removal.**

**TO ENCOURAGE GROWTH OF YOUNG TREES**

I believe "Health" in a forest is best achieved and maintained by selective logging of areas and replanting. Young healthy trees take upon more carbon dioxide and release more oxygen into the atmosphere than "Old Growth". This has a "global" effect and benefits all mankind, and also a product is harvested which has many uses and therefore employs many people. (Individual, Olympia, WA - #A20848.60100)

**696. Public Concern: The Forest Service should thin second growth forests.**

**TO PROMOTE OLD GROWTH CHARACTERISTICS**

There are millions of acres of second-growth forests within late successional and riparian reserves that, according to scientists at the PNW Research Station, will not develop the old-growth characteristics needed in these areas without being thinned. (Individual, White Swan, WA - #A25726.60100)

**697. Public Concern: The Forest Service should allow even-aged management.**

**AS A METHOD FOR REGENERATING EVEN-AGED FORESTS**

The Wilderness Society with paid executives has skillfully used "clear cutting" as a "cause," much the same as Hitler used the "Jewish" problem to support his efforts at world domination. Yet, clear cutting is very simply one method for regenerating even aged forests. However, the Wilderness Society has convinced a large portion of the public in metropolitan areas that "NO" trees should be cut. This has led to vast accumulations of woody fuels and thus the increase of very severe fire seasons (i.e., 2000 and 2001) (Note—at the time of this writing, a 25,000+ acre uncontrolled fire is burning on the Gallatin National Forest mostly in a designated wilderness study area south of Livingston, Montana.)

The congressional establishment of wilderness study areas in western forests has placed the U.S. Forest Service in a no-win situation for almost 25 years, and has severely eroded their ability and credibility in the management of the forests. This administration needs to end the wilderness study concept and move forward. (Individual, Bozeman, MT - #A13871.90510)

## Negative Effects

### **698. Public Concern: The Forest Service should address the negative effects of roads on vegetation.**

#### **INTRODUCTION OF INVASIVE SPECIES**

Roads can enable invasive plants and animals, many of which are nonnative, to expand their ranges. Exotic species often thrive in the environments created by roads and can also be inadvertently transported by vehicles. Roads create open edges to forests that can make species more vulnerable to pest epidemics, invasion of nonnative species, and nest parasites. Examples include: weeds, such as spotted knapweed; aggressive brood parasites, such as the brown headed cowbird, and pathogens, such as cedar root rot. (Professional Society, No Address - #A26799.50000)

#### **EFFECTS ON RARE PLANT SPECIES**

This roadless policy is very important. The Nature Conservancy, a mainstream conservation group, has documented that one third of the plant and animal species in the United States area at risk of extinction. Scientists have shown that many species need large areas free from development impact to maintain viable populations. Easy access through roads or off road vehicles can be a disaster for plants and animals with commercial value. International markets for all sorts of rare wild plants and animals are putting more and more of them at risk. A recent conviction of a man for illegally harvesting at least 107 tons of beargrass from the Willamette National Forest highlights the problem. So do internet ads for the rare Cascade Range Lady Slipper Orchid which cannot be cultivated and cannot be legally harvested. The last thing this rare plant needs is more roads so more people can easily harvest it. (Individual, Deadwood, OR - #A882.50500)

### **699. Public Concern: The Forest Service should recognize the negative effects of tree farms on adjacent areas.**

In our Pacific Northwest, less than 7% of our old-growth forests are left. But some of the Forest Service lands contain older second-growth that has naturally re-generated and could maintain the forest canopies to restore wildlife. But this land is surrounded mostly by tree farms that cut and spray extensively. Each tiny piece of land is precious.

Our little group is a loose-knit, local watchdog group working on various issues. We have united for many reasons, but our main, ultimate goal is one thing: to bring the wildlife that has been wiped out with all the logging activity. The apples lay uneaten for months at a time in this valley. It is dead and sterile. They've wiped out habitat sprayed poisons on everything, then the hunters and trappers take whatever is left. Our valley is lifeless! (Organization, South Prairie, WA - #A28978.50500)

### **700. Public Concern: The Forest Service should recognize the role of animals in spreading noxious weeds.**

An issue raised by those against vehicles in the forest is the spread of weeds. I have pulled noxious weeds on my property and on adjoining forest lands for many years, and I can tell you that animals, both wild and domestic, are high on the list of both weed spread and erosion of the road banks. Many of the knapweeds I have pulled originate from the middle of a cow pie in an area where motorized vehicles cannot access. Hikers and horses are not immune from spreading weeds either. (Individual, East Helena, MT - #A20422.15168)

### **701. Public Concern: The Forest Service should address the effects of livestock grazing on vegetation.**

The sheep under shepherds guide were not controlled from devastating certain land. Certain wonderful wildflower areas were being damaged. (Individual, Reston, VA - #A11846.60100)

## Social Environment and Values

This section includes two subsections: Social Values of Roadless Areas and Adequacy of Analysis.

### Social Values of Roadless Areas

#### Summary

**Social Values General** – a number of respondents comment on the social values they associate with roadless areas. Some urge the Forest Service to adopt the Roadless Area Conservation Rule as written in order to best protect these areas' social values.

Respondents describe a wide range of social values that they believe would best be maintained through implementation of a national rule. One of the most commonly mentioned of these values is the contribution of roadless areas to overall quality of life for local residents and visitors alike. People also state that they value these areas as places to escape from modern pressures, such as a fast pace society, and motorized vehicles; as places to experience natural grandeur; and as places to experience the solitude and natural quiet to be found in them. Others emphasize the multitude of irreplaceable non-monetary values and healthy ecosystems which, they say, roadless areas provide. Some state that human survival and modern society depends on these values, yet they are taken for granted. (See also Chapter 4: Economic Environment and Values: Evaluation of Roadless Areas: *Comparative Costs and Benefits of Ecosystem Protection and Resource Extraction.*)

People also comment on the spiritual values they associate with roadless areas, from the perspective of both traditional institutional religious tenets and more general non-denominational beliefs of spiritual connection and renewal. These respondents state that their religious faith demands careful stewardship and protection of the natural environment, and they say the Rule best embodies this imperative.

The effects of population growth, immigration, and urban sprawl are also topics of comment among many respondents who discuss social issues. Respondents assert that the Rule provides an important counterbalance to continued urbanization and development of private lands. According to some, roadless areas provide an important backcountry recreation outlet for growing metropolitan areas and can take the pressure off of overused wilderness areas. Others state that urban sprawl which encroaches on public lands impedes effective forest management through natural disturbance processes, and ask the Forest Service to help combat this problem.

Although some believe the Rule will protect important social values, other respondents disagree with respect to certain values. These respondents suggest that important social values will be lost due to implementation of the Rule. On a related note, while some respondents assert that roadless areas have their own intrinsic values and right to exist distinct from the human values placed upon them, others believe that roadless areas have no intrinsic value apart from human use and enjoyment.

Some state that intact roadless areas are a vital component of the true American or western experience and provide critical freedom values to an increasingly rule-bound society. In contrast,

others assert that the Rule violates true western values by imposing too many restrictions of its own and restricting the traditional motorized use of these areas.

People also discuss the value they find in personal challenge due to the remoteness of many roadless areas. They claim that the more difficult the journey, the higher the personal sense of accomplishment, and state that this is lacking in a world filled with modern conveniences and immediate gratification. Other respondents disagree and state that the time pressures of modern society necessitate easy vehicular access, or that modern technology makes a true wilderness experience impossible.

While some respondents describe the non-motorized recreational activities in roadless areas as fostering their own family togetherness and which, they assert, will be protected by a national rule, others who enjoy motorized sports state that their family activities are threatened by the Rule. In both cases, respondents agree that these roadless areas are important, but they disagree about which activities are compatible with roadless area values.

**Bequest Values** – Many respondents who discuss social values cite bequest values to future generations of Americans. They believe that the Roadless Area Conservation Rule will best preserve these bequest values, leaving a legacy of environmental protection and roadless area values to their own children and grandchildren as well as to society in general. Some respondents, however, state that traditional multiple use management and resource development provide the proper legacy to future generations, and that a national rule not only threatens roadless areas with disease and catastrophic fire, but prevents future generations who prefer motor sports from access to these areas. A few writers say that bequest values are overblown, and state that a national roadless rule should either be implemented or abandoned to benefit the current generation.

**Educational Values** – Some respondents state that they associate educational values with roadless areas. For some, these areas serve as classrooms for their courses, such as college-level biology or wilderness challenge and backcountry skills programs. Others ask that the Forest Service help educate youth about the values of intact ecosystems in order to increase support for their preservation.

**Access for Special Populations** – Access for special populations is frequently mentioned by those who address social values. Respondents conclude that a national rule will unfairly restrict access to public lands by the elderly and disabled because motorized opportunities will be lost. A number of people describe their own disabilities or age, and assert that their needs are being ignored.

Other respondents believe the Forest Service should dispute the claim that the Roadless Area Conservation Rule will adversely impact these populations. Some state that roaded areas of national forests and other public lands provide ample roaded access to the natural world for the elderly and disabled. Other older Americans state that they still prefer to hike in roadless areas, and that even when they are no longer able to do so, they will benefit from the protection of these areas under a national rule. Others say that special populations can enjoy roadless areas by non-motorized means like other more able-bodied citizens, and will benefit from a national rule. Finally, some respondents suggest that a set of exceptions and accommodations for the elderly or disabled could be incorporated into a national rule.

**Health and Wellness Values** – Some respondents suggest that unmanaged roadless areas make important contributions to health, both physical and mental. Many assert that these areas provide rejuvenation and stress reduction, while others say they provide wilderness therapy opportunities for troubled youth. Some suggest that a national roadless rule will help to encourage walking and help combat the national obesity epidemic. One woman states that she feels safest in roadless areas, far from roads and the easy access they provide to potentially dangerous characters. Others note safety hazards posed by roads cut on steep slopes from landslides, and urge the adoption of a national rule for human safety considerations. Some respondents, however, suggest that a national roadless rule will hamper search and rescue efforts, threatening public health and safety.

**Noise** – A few respondents discuss noise levels in roadless areas, and ask the Forest Service to establish baseline natural sound levels and to set decibel standards, especially for exhaust systems of motorized vehicles and for aircraft. They suggest that high noise levels cause stress to humans and wildlife and are not appropriate for roadless areas. Others state that loud vehicles contribute to conflicts between user groups, so quieter machines could help minimize this problem. Several other respondents assert that the Forest Service should not arbitrarily require roadless areas to have semi-primitive core areas in order to qualify as inventoried because a complete absence of sights and sounds from surrounding areas is not possible, particularly in the eastern United States. They suggest that this requirement will disqualify otherwise deserving roadless areas from protection under a national rule.

### *Social Values of Roadless Areas General*

#### **702. Public Concern: The Forest Service should protect roadless areas with a national roadless rule.**

The roadless areas in our national forests have values beyond the board feet that can be hauled from them. These are places of immense biological importance for maintaining genetic diversity, these are areas that allow for recreation that cannot be found in more developed areas. We must preserve areas that are difficult to reach. These are the areas that lift our spirits, test our bodies, renew our sanity and allow for encounters with creatures that do not live in our crowded neighborhoods. (Individual, Bound Brook, NJ - #A1601.70000)

We in Boulder County continue to support the Roadless Area Conservation Rule (the Rule) and urge its implementation. Our constituents value unspoiled wilderness and recognize that wild lands have a special significance for our own quality of life. They also take a strong interest in preserving this land for the enjoyment of future generations. The Rule is consistent with these priorities, and the public's extensive participation in shaping this rule should be honored. (Elected Official, Boulder County, CO - #A18117.70300)

In Montana we love to hunt wild game. I can tell you from experience where the elk, bighorn, deer, grouse, and all other variety of wildlife like to hang out. . . . Roadless Lands of the National Forests. Cowboy Heaven, the Snowcrest, Wolverine Basin in the Gravellys, Hellroaring in the Centennial Mountains. These places are priceless and they would provide very little long-term economic gains by being developed in any way shape or form. They are serving the greatest good for the greatest number just as they are; by being in their wild state as a part of our health, good fortune, and heritage. It is not often that society will look back in 50 years and comment on how beautifully that road, or that oil and gas well looks upon the landscape, but they will understand what is special about their public lands when they see them unimpaired because we took the right action back in the year 2001. I ask you Chief Bosworth to use your empirical judgment, your heart, and your vision for the future when you recommend to President Bush what should be done regarding America's prized public treasures. As time

goes by our undeveloped lands where clean air, water, solitude, and wild integrity exist will only become more treasured. Let's do what the majority of Americans want, let's keep logging, mining, oil and gas development, and commercialization out of our roadless lands. (Individual, Harrison, MT - #A6949.70000)

The past greatness of this country consisted in subduing nature; our glory as a nation today is commensurate with our understanding of how deeply our actions effect nature and making a conscionable effort to prevent its mindless destruction. Chief Seattle summarizes this greatest of all threats we face today with these immortal words: "Whatever befalls the earth, befalls the sons and daughters of the earth. We did not weave the web of life. We are merely a strand in it. Whatever we do to the web we do to ourselves." (Individual, Osburn, ID - #A8307.70500)

#### **FOR THEIR NATURAL GRANDEUR AND BEAUTY**

To exclude merely 30% of America's wild national forests from logging, mining, and drilling is already a generous sacrifice of the lustrous heritage of the pristine New World which has shaped so much of American consciousness. And where the sense of the grandeur of our great nation's natural glory has fallen into disregard, it needs to be shored up and revitalized. How can we grow a proud people and expect them to invest in the preservation of the natural state of it that so impressed our forefathers and pioneers. If we become a people for whom that natural grandeur has been lost, we will lose a concrete seed which would have continually replanted a kind of pride of place the loss of which will leave us spiritually impoverished. We need, if anything, to heighten the pride of place that preserves and conserves and honors with the awe that our natural grandeur can still evoke. (Individual, Lexington, KY - #A244.70000)

I would just like to say that it is a true enjoyment to have vast areas to wander and hunt without roads. I enjoy a lot of activities in life that are in and amongst the general public however I do love to be able to break away and have space (a lot of it!) to myself. If you take this space away how could we ever get away to our more natural surroundings? My other point is we all know what will happen if you open these areas up with more roads, we will never be able to enjoy the freedom of roaming these unbroken forests and prairies again. Land is a limited resource and we should hold onto its natural beauty as long as we can. (Individual, Roseville, MN - #A4969.70300)

There is nothing more beautiful than camping in the national forests and not have to worry about ATVs or logging trucks disturbing our pristine forests. Please do not contribute to the destruction of our nation's natural beauty. (Individual, Louisville, CO - #A1917.70310)

I would also like to say that these forests and their ecosystems are a very important part of my life. I thrive on their natural beauty. Please take these comments and consequences of deforestation as seriously as I do. (Individual, Laramie, WY - #A1929.70310)

There is the plain old aspect of aesthetics. We just need to have some areas that are in their natural state. (Individual, Bozeman, MT - #A15403.70310)

#### **FOR THEIR INTRINSIC VALUE**

The true value of our forests lies not in industrial timber harvesting or in the creation of more agricultural tree farms but in the many benefits the forests give us as intact ecosystems - some of which can be assigned a monetary value and others (i.e., the experience of being in such places) which defy any simple method for inclusion in a cost-benefit analysis. (Individual, Coos Bay, OR - #A180.70500)

Our nation must work to maintain the value that is held in the simple knowledge that lands still exist free of human interference. (Individual, Dallas, TX - #A289.70500)

A forest should not be viewed in the same light as a field of corn. The corn was specifically put there by man for a specific purpose, whereas the forest was inherited with no specific purpose. It is an integral part of our home. We must treat it that way. (Individual, No Address - #A594.70500)

It seems to me that the economic values of these landscapes pale in comparison to their intrinsic values. No logging should be permitted unless for general forest health or in imminent danger of wildfire. Absolutely no drilling for oil or other natural fuels—it's time we utilize solar and wind power. The Roadless Area Conservation Rule preserves the recreational and environmental qualities we all enjoy and also provides the Forest Service with a reliable, sustained monetary income. (Individual, Cedar City, UT - #A865.70500)

It is time for our government to exercise a deeper strength and dignity of power that reflects our greater human awareness of the inherent value and the awe-inspiring beauty and magnificence of this part of life on earth. Please do not give in to those who look at such magnificence and can see only manufacturing materials and dollar signs. We cannot afford a government now with such limited vision. (Individual, Alexandria, VA - #A15814.70500)

#### **FOR THEIR REPLACEMENT VALUE**

Replacement value—roadless areas are finite. They can be eliminated in as little as a summer, but require decades-to-centuries to be recreated. Because they are vulnerable and important, they need protection. (Individual, Northridge, CA - #A21249.70000)

The ultimate consideration, to me, is the fact that no matter what values you associate with a roadless area, once a road incurs upon that area, the values are lost forever. This should be the cautionary guide you use to help you protect roadless values. (Individual, Lewiston, ID - #A29569.45100)

#### **FOR THEIR NON-MONETARY VALUES**

Knowing that there is something else out there, wildlife, in their natural habitat, knowing such beauty exists, FAR FAR outweighs the material goods that may come out of logging Alaska's wildlife. Can you just imagine a world, well it isn't getting too hard, but a world in which we have caged all remaining, suffering wildlife, and replaced it with virtual reality? Do you know the psychological consequences of cutting down our natural surroundings? Can you honestly say that, in your heart, you know that you are doing the right thing? . . . Just step back from your this-second-comfort-bond reality and take heart. Consider the possibilities of the beginning of compromise. Please, respect the wishes of millions (for, environmental concerns have grown ostensibly among the public, and are becoming a sincere, given interest of the citizens of the world). Thank you for opening your heart. (Individual, Schererville, IN - #A3790.70500)

Our present attitude of disregarding everything and anything of non-monetary value is getting completely out of hand. Please, let's keep something! (Individual, Bronx, NY - #A4296.70500)

What makes some of our natural areas also special is the distance between roads. I would love to see what happens in those places where there is little or no interference. Even if humans have limited access (non-motorized vehicles), no grazing, mining, logging, etc. I think humans can benefit in SO many ways. (I also do not believe that we should always and only be concerned about how humans benefit over and above all other life forms). Humans might benefit scientifically in being able to observe how plant and animal wildlife populations arise, dwell and vanish from areas. What happens when there are natural outbreaks of fire, insects, non-native species of plants and what species are benefited by those outbreaks? (Individual, No Address - #A4477.70500)

Tell the Forest Service that roadless areas are precious in their wild, natural condition, not just for wildlife, but for recreation, watershed values, biodiversity, and scenic splendor. (Individual, Murphys, CA - #A4809.70300)

Regarding the Forest Service balancing competing values and limited resources, the Forest Service should remember that roadless areas are a limited resource. Logging, mining, oil and gas development and their associated infrastructure (roads) are single uses pushing out all other values of clean water and air, open space, wildlife winter and summer range, solitude and yes, that favorite place in the Wind River Mountains some “local” told us about. (Individual, No Address - #A4523.70500)

#### **FOR THE AMERICAN EXPERIENCE**

There is an ever-shrinking inventory of wilderness in the country. In most of Europe, there is no such thing as wilderness, and to follow their lead in the name of “progress” would be a serious and unrecoverable error, one which our descendants will one day curse us for. The preservation of what little wilderness that remains in the US is essential to the preservation of the American experience. Even people who never go to the wilderness are enriched by the knowledge that it is there, as Wallace Stegner so eloquently wrote. (Individual, No Address, #A470.70300)

As a Native American let us keep this land so all of us can use it. Hunting, fishing, camping. And keep big business out of it, this belongs to all of us free people. I am also a W. War Two veteran who has paid the price in keeping America a free land to live in. (Individual, Kalamazoo, MI - #A7203.70000)

Cultural value- wilderness is an American idea of one of our greatest exports. Vast roadless areas built the national character, influenced our expansionist history, and our writers like Cooper, Emerson, Thoreau, and Leopold. The continued loss of roadless areas breaks our links with our history and our sense of identity as Americans. (Individual, No Address - #A12601.70200)

Bush’s devious manipulation of the Clinton Roadless Area Conservation Rule is a disgrace to our national honor and its cherished legacy of wilderness protection—one of America’s greatest contributions to world culture—and the right of every American to inherit that legacy. (Individual, Osburn, ID - #A8307.70400)

#### **FOR THE WESTERN EXPERIENCE**

I sincerely feel that the Roadless initiative is the only and best way to preserve the Montana lifestyle and beauty that we love. Eventually, if we don’t preserve it the way it is, Montana will be like all the other overpopulated, wildlife scarce states that are nothing but roads, factories, houses etc. Preserve our Montana heritage!! (Individual, Polson, MT - #A5800.70300)

#### **FOR THEIR FREEDOM VALUE**

Freedom value—in his novel 1984, George Orwell’s totalitarian dictator “Big Brother” made the elimination of wilderness his top priority. Wilderness was a place where thought could not be monitored or controlled, and therefore represented a threat to the regime. (Individual, Northridge, CA - #A21249.70000)

#### **FOR RURAL COMMUNITIES’ QUALITY OF LIFE**

Rural communities next to National Forests have something that no amount of money can buy. Please live near the forests for the quality of life, not the profit. (Individual, Bozeman, MT - #A284.70300)

The San Juan National Forest contains 500,000 acres of inventoried roadless areas. These include the largest single non-wilderness roadless area in the Southern Rockies—the 150,000-acre Hermosa Roadless Area. Hermosa is one of the most popular backcountry recreation areas in the entire state. The area is used by a wide variety of backcountry users, and the Hermosa Creek Trail is a widely advertised single-track trail for mountain bicycling. Hermosa includes start of the highly popular Colorado Trail, which winds 470 miles through Colorado from Durango to Denver. The Colorado Trail begins along Junction Creek on the outskirts of Durango, and heads into the high alpine country of the La Plata Mountains and the heart of the Hermosa Roadless Areas. Hermosa is only the best-known of numerous backcountry recreation areas located on national forest lands near local communities in southwest Colorado. The presence of these primitive recreation opportunities on national forest roadless lands next

to local communities is an extremely important factor in the quality of life for local residents. The Haflin Creek, Missionary Ridge, First Fork, and Red Creek Trails are all located in a national forest wilderness area within 10 miles of Durango, for example. (Individual, Durango, CO - #A11655.70300)

#### **FOR OVERALL QUALITY OF LIFE**

One of the major characteristics of roadless areas is the high quality of life that they provide to Americans. Quality of life attributes attract businesses, commuters, retirees, and other non-local wage earners. Because private lands are generally managed for commodity extraction and with little foresight or broad analysis, the burden of providing these quality of life attributes falls on the public lands network. A recent poll conducted by the Mellman Group, Inc. and commissioned by the Heritage Forest Campaign, the National Audubon Society, and The Wilderness Society found that 63 percent of Americans support a proposal to permanently protect all unroaded areas 1,000 acres or greater on public lands. Only six percent of those surveyed thought too much land was already protected. The segment of society that is moving to regions for their wilderness and quality of life values, clearly, wants to see the area they are moving to protected. (Organization, Portland, OR - #A12004.70300)

New Hampshire is the proud home of the White Mountains National Forest which provides solitude and recreational values for our residents, along with the residents of several other states who travel here every year to enjoy the White Mountains. In fact, more people visit *our* National Forest every year than the combined number of visitors to Yosemite and Yellowstone. Residents of states with no national forests depend on the government to protect such places, along with seashores, wilderness areas and sites vital to our common history. These areas have been set aside and preserved for everyone to experience and enjoy. The Roadless Area Conservation Rule, as it is written in the January Record of Decision is already a compromise, and ensures the same status is given to the remaining unspoiled 31 percent of our national forests, while leaving more than half open to logging, mining and drilling. (Elected Official, State of New Hampshire - #A22595.70300)

#### **FOR TRUE CONSERVATIVE VALUES**

True conservatives value stewardship and saving for the future. Since the days of Theodore Roosevelt, true conservatives have supported protection of our beautiful natural heritage for future generations. Roadless areas are America's last wild places. These pristine lands provide clean water, wildlife habitat, and great opportunities for hunting, fishing, hiking, and other recreation. If we lose our last wild places to bulldozers, they will be lost for good. (Individual, San Diego, CA - #A23757.70400)

#### **FOR SPIRITUAL RENEWAL**

The forests are our children's heritage. The forests are our spiritual connection with our planet. If we allow them to be plundered for the sake of big business, we are committing a very slow and painful suicide. We will lose our humanity and our ability to care. (Individual, Red Lion, PA - #A1900.70000)

51% of America's National Forests are already open to logging, mining, and drilling. This policy represents a balanced approach to managing our National Forests by protecting the remaining 31 percent. The Roadless Area Conservation Policy was developed to ensure the last remaining 31% of unspoiled National Forest lands are preserved for the enjoyment and use of all Americans. These treasured lands provide a recreational and spiritual escape for all Americans. (Individual, Portland, OR - #A3678.70000)

This forest is important due to the enormous size and age of its trees. From the Pope to the Dalai Lama, you will find serious established religions encourage the experience of the immensity of the natural world, and the protection of the natural environment. Entering this park is like visiting the Cathedral at Chartres, or our own St. John the Divine. It allows you to feel connected to something much bigger than you are, and this is a wonderful thing for many human beings, and always has been. A huge living cathedral is very special indeed, rare in the world, incomparably valuable—compared to the need for more decks and lawn furniture, headed eventually to some landfill. (Individual, No Address - #A491.70330)

I am a Protestant clergywoman who believes that we need to keep some lands from our intrusion so that we can enjoy them as God made them. (Individual, New York, NY - #A633.70330)

Spiritual values are present in the forest for both Native Americans and others. As a mainly urban society, cut off from our root connections to nature, these forests will serve to renew our spirits. (Organization, Cookeville, TN - #A5451.70330)

#### **TO UPHOLD RELIGIOUS TENETS**

Our Torah teaches us that it is forbidden to kill a species and commands us to choose life. The Central Conference of American Rabbis, the largest rabbinic assembly in our country, in a March 2000 resolution, reminds us that we are called upon: “to serve as protectors and defenders of God’s magnificent creations” and “to safeguard and weave together the patchwork of remnant forests as best we can.” (Individual, Walnut Creek, CA - #A1101.70330)

Bush has promoted the importance of upholding Christian and diverse religious values. Even before God gave the Ten Commandments to Moses, He made a covenant with Adam and Eve to keep the garden—to care for all His creation. This is one of the highest callings of any faith. Ecumenical Patriarch, Bartholomew I, spiritual leader of the world’s 250 million Orthodox Christians, proclaims that “To commit a crime against nature is a sin. For humans to cause species to become extinct and to destroy the biological diversity of God’s creation; for humans to degrade the integrity of the earth by causing changes in its climate by stripping the earth of its natural forests, or destroying its wetlands; for humans to contaminate the earth’s water, its land, its air and its life with poisonous substances—these are sins.” Pope John Paul II calls our Godless, materialistic society the “culture of death.” The slaughter of innocent nature confirms this as much as any social problems. One of the greatest holocausts of the Twentieth century has been the ruthless and arrogant clear cutting of our National Forests and the corresponding global deforestation by multinational corporations, which has led to the highest extinction rate civilization has ever known. (Individual, Osburn, ID - #A8307.70330)

Let’s keep the wild outdoors, God’s great outdoors and leave things the way that God meant for it to be wild!! (Individual, Lineville, AL - #A12276.70330)

Along with other Christians and Jews I have been praying and fasting for these roadless areas to not be defiled. Instead please set aside these areas as sanctuaries which testify to the glorious handiwork of our Creator. In the least, let us leave them for our children to better learn how nature operates, to recreate and refresh their bodies and spirits in, and to have the opportunity to decide for themselves, when they grow up and are in charge, how this land should be managed. We have been praying and fasting together to PETITION our God to conserve our national Roadless Areas on the public’s lands by protecting them from human exploitation. We have been CONFESSING our greed and ignorance that has resulted in so much destruction in our nation’s forests. We have been MOURNING the consequent suffering and loss of life therein. We have been REPENTING of this sin by seeking to halt the destruction of Roadless Areas and instead of exploiting these pristine places, we have been working to restore—with the help of Almighty God—the public forests which have already been damaged. We are calling the Christians among your and President Bush’s administration to WORSHIP God by honoring Jesus Christ through whom and for whom all created things were made (Colossians1: 16-17) and by whose blood shed on the cross all things will be reconciled to God (1:19). (Individual, Saint Paul, MN - #A19042.7033)

#### **FOR ESCAPE FROM MODERN PRESSURES**

I am a frequent user of our National Forest lands, hunting, fishing, hiking, and camping and would like to keep as many of the currently roadless areas roadless for future generations to enjoy. Nothing is more enjoyable than to walk into an area void of normal human activity and escape modern pressures and get a small glimpse into the natural past of our nation’s wild areas. (Individual, South Point, OH - #A4198.70000)

Keep our roadless forest roadless. In this high tech world where even small children are wired to the hilt with cell phones, PCs, PDA, FAXs, are driving ATVs, motorcycles - let us keep these places natural-native. If for nothing else as an example of what the world was like before the Internet, bar codes and gas powered vehicles. Don't get me wrong I like technology and use it but I also like some down time, some peace and quiet. Keep the "wild" in wilderness. (Individual, No Address - #A339.70300)

It is bad enough that the thousands of government related forms and assorted paperwork require the demise of millions of trees each year just to produce the paper necessary to print them on, but this frontal attack on America's National Forest lands is adding insult to injury. If you truly doubt the importance of preserving these forests, then I ask you to personally spend a full day (24 hours) within one of the threatened areas. Be there when the first glimmers of sunlight filter through the deep green foliage, watch Nature's wildlife as they scurry around searching for bits of food and/or just playing among the leaves and branches, and stay long enough to observe as the evening shadows fall and the moon and stars appear in the sky: Open your mind and your spirit to the unique peace that is found in very few places in our hectic lives. If, after 24 hours in this calm, peaceful, secluded wilderness, you can return to the hustle and bustle of the city, pass a road construction area, and truly believe in your heart that the rumble of heavy equipment would indeed be beneficial to the serenity of the forest, then may whatever God you believe in, have mercy on your soul. In the words of the songwriters, "Don't it always seem to go that we don't know what we've got 'til it's gone . . ." Be sure that YOU know what we've got before YOU contribute to its being gone. (Individual, Milton, FL - #A1298.70300)

#### **FOR ESCAPE FROM CAPITALISM**

Forests serve as a place of respite from the grinding capitalism that surrounds us every day. Please, I beg you, leave this last remnant of our country's wilderness as it is. Once these forests are opened up to logging and mining, they will be plundered by self-seeking, aggressive folks as surely as have all other forests with road access. I live most of the time here in Massachusetts, but every chance I get I head up to New Hampshire or Maine. These forests are a huge chunk of my delight in living, my favorite places to walk and just to be. It is simply unthinkable that they should be exploited, developed, stripped of their beauty. (Individual, Cambridge, MA - #A6268.70300)

#### **FOR SOLITUDE**

Roadless areas are important to hikers seeking undisturbed, scenic landscapes and solitude in wild backcountry and outstanding natural areas. Roadless areas are also critical for ecosystem protection, including water quality, wildlife, and vegetation—all valued pieces of the hiking experience. (Individual, Sebastopol, CA - #A5115.70000)

#### **FOR NATURAL QUIET**

I have been to the BWCA for about 25 years plus several years in the Quetico. The "silence" is marvelous—it leaves plenty of room to hear the loons and to see moose "playing" in shallow water; and enjoying "listening" to the wind, looking at the stars and sunsets. (Individual, Milwaukee, WI - #A8098.70320)

Like Aldo Leopold, Henry D Thoreau, and many others, I require wilderness, wilderness, wild nature. And places clean, with solitude. There are precious few such places. I go to, e.g., to a waterfall some miles from US28, select a high rock with a good view, and prepare myself for a time of quiet and recreation. But in the distance or even nearby I hear ATVs, vehicles, airplanes, chain saws, radios, boom boxes. And I live surrounded by Monongahela, George Washington and Jefferson National Forests. (Individual, Bartow, WV #A8759.70320)

Our population continues to demonstrate by its use patterns that people need quiet, wild places to visit to regenerate themselves physically, mentally and spiritually. We are on the right track toward accomplishing this most important goal. I implore you to keep us moving steadfastly in that direction. (Individual, Charlottesville, VA - #A4886.70300)

There is no necessary hierarchy of values inhering in and services provided by roadless areas, so my list is not necessarily in rank order from highest to less high: . . . Quiet. Something so rare that finding it in a wild area is even surprising. Quiet is not soundless but includes the sound of falling water, singing and twittering birds, the rustle of trouser legs and boots on bushes, but it ends with the racket of gunned engines and the clank of machinery. (Individual, Big Fork, MT - #A17221.45100)

#### **FOR THEIR ABILITY TO REVEAL THE INTERCONNECTEDNESS OF HUMANS AND NATURE**

Wild areas make our interconnectedness to other life forms evident and take us out of ourselves to see our place in the whole. (Individual, Westfield, NY - #A14074.70000)

There are few places left in this country, where a person may go and listen to the Earth's voice. To be able to stand on the edge of a ridge top and see nothing of man. I have, as a child, been to places like that. Many of those areas are now resorts, housing developments, or cities. I feel that a species that cut itself off from Nature, as She decides to grow and develop, is a small and futile species. When you cut the foundation out from under something, it weakens it. Nature is our foundation and in all times past, our strength. (Individual, Houston, TX - #A1372.70300)

Much of our culture is focused on immediate gratification and material goods to the detriment of our psychological health and our relationship with the earth. We need the Forest Service's assistance in taking the long-term view of a protective stewardship of the earth and the deeper satisfactions of a quiet, respectful, harmonious relationship with the natural world. (Individual, Needham, MA - #A15773.70000)

#### **FOR THE PERSONAL CHALLENGE IN THEIR INACCESSIBILITY**

The natural barriers that the land presents to those who would enjoy them are their greatest blessing and benefit. I can personally relate to this concept, as I recently returned from one of the most physically challenging trips to the Boundary Waters Canoe Area Wilderness in early August.

Despite these challenges, including injuring my back on the return trip and having to paddle and portage through it, this was probably one of the best trips we have ever experienced. The heart-to-heart talks I enjoyed with my son, cuddling up together in our sleeping bags, are a priceless treasure. Where else but in the wilderness could I tell my son that even though I would not always be with him in life, these times we shared would be? Where else could those bonds be experienced and tested?

The wilderness has a value, but its price cannot be measured in human terms. Its chief value is in its remoteness and the challenges it presents to those who would experience its wonders—not in its accessibility. Please preserve its wildness and pristine beauty for all to enjoy, both now and long into the future. (Individual, Roseville, MN - #A16399.70000)

#### **FOR ESCAPE FROM MOTORIZED VEHICLES**

This rule is important to me as a commercial outfitter and outdoors tour guide. I use public lands for low-impact hiking tours for persons of all ages. My focus is on education of the public on public lands issues, local flora and fauna, history and archeology of the Rio Grande National Forest and adjacent areas. The only man-made sounds we encounter are airplanes flying overhead. For my guests, this is a relief to be away from the noises and pollutants perpetuated by motorized vehicles. (Individual, Del Norte, CO - #A5289.70300)

I live close to the BWCA [Boundary Waters Canoe Area]. Last fall I went on a canoe trip in this relatively small but popular wilderness area. I camped at a beautiful spot on a lake sitting on an island of granite. For a while I thought I found silence and escaped the motorized world then I heard motors in the distance. You can't even go to the BWCA and not hear motors. (Individual, Eveleth, MN - #A5766.70320)

We need more places to hike and get away from their obnoxious abominations of sno-cats and A.T.V.s and their noise and pollution. (Phoenix, AZ - #A6523.70300)

### FOR FAMILY TOGETHERNESS

My fondest memories are the times spent with my father in the wilderness areas of the National Parks system. No vehicles or radios gave me time to know my father better. A million sons need this time away from the cities with their dads. (Individual, Dallas, TX - #A4206.70340)

I live in northern Utah, but I have visited the forests in both northern Utah and Montana with my family. Roadless areas are important to me and my family because being in them has healed us mentally, spiritually, and physically as individuals and as a family. Going out in those forests has literally kept our family together by healing us because of the awe and wonder they have provided. As I mentioned in a previous letter, going out into our wild forests has also brought us closer to our Creator and has given us hope in life and faith to continue on. Our administration says that it is for family values. Protecting our natural areas, including our roadless forest lands will help to protect wholesome family values by keeping families together. I can personally bear strong testimony of that. (Individual, Kaysville, UT - #A5231.70340)

Entering into the natural world on its own terms, by foot or paddle craft, has been the bedrock of our family vacations for two decades, and for my family of origin for three decades before that. Time spent in natural beauty is one of the strongest builders of "family values" available in our culture today and economic development has eliminated vast amounts of that natural beauty during my lifetime. (Individual, Needham, MA - #A15773.70340)

These areas are important to me not just to look at, but to use. I have backcountry skied, climbed, and backpacked extensively in Colorado, Utah, Wyoming, New England, Maryland, Virginia, and Washington State. Since I moved to Colorado in 1984, my wife and I have sought out roadless areas all over the west as places to spend our vacation time. Our climbing and backpacking trips have brought many memories with friends and families. I'm now at a time in my life where I want to share this with my 5-year old daughter. We have taken her backpacking in Washington State and Colorado. Therefore the Wilderness areas, the National Parks and the roadless areas of our nation are very important to me. All of them are, not just the local ones, because I use them and I see myself using them even more in the future. (Individual, Glenwood Springs, Co - #A17313.70000)

### FOR HUMAN SUSTENANCE

Our family uses and values roadless lands. Our wild game which we use for sustenance comes from wild lands, as does our drinking and municipal water. My four year old daughter and eight year old son frequently walk or snowshoe into roadless national forest areas of Montana and Wyoming. Lazy men who say they need yet more roads (and ORVs) lack credibility and perspective. (Individual, Helena, MT - #A1717.70300)

### FOR HUMAN SURVIVAL

The evaluation of uses of roadless areas should not be reduced to simply economic evaluation. As our population grows, development will encroach on those areas which are undeveloped and unprotected, thus putting additional pressure on the remaining undeveloped areas which have protection. In addition, we need only look at what transpired on Easter Island to see what happens when over utilization of the natural resources occur. (Individual, Troy, IL - #A6981.70500)

It is time that we begin stewardship of the greatest gift we have, the air we breathe and the naturalized planet that provides us with it. Continued destruction of natural areas will only have ill effects on our health and longevity as a species. (Individual, Silver Spring, MD - #A7905.70300)

How enriched my life has been from witnessing 7 bald eagles in their natural habitat. How much more respect I have for nature (forests, mountains) and wildlife. We cannot sell these things out for the sake of oil or timber. If we do, we will not only lose our forests, mountains, wildlife we also will lose mankind

for each is codependent on the other. Man cannot exist without nature and nature cannot exist without man. (Individual, Dracut, MA - #A6220.70000)

#### **FOR SCIENTIFIC RESEARCH**

Roadless areas: Offer opportunities for scientific study and research. (Individual, Olympia, WA - #A4959.70300)

People need these areas so they can compare with the managed areas of the past. (Individual, Lamona, WA - #A5460.70300)

Social and economic values are immensely enhanced by and near such climax forests. . . . Such forests provide an immensely valuable scientific laboratory where discoveries of nature's processes lead to enhancements to civilization such as new medicines. (Individual, Salem, NH - #A8263.70000)

There are tremendous environmental, social, and cultural values associated with roadless areas. These include: (1) scientific value—they provide the only meaningful baseline against which forest management can be evaluated. (Individual, Northridge, CA - #A21249.70000)

### **703. Public Concern: The Forest Service should protect roadless areas.**

#### **DUE TO INCREASED POPULATION**

There are many reasons why I believe protecting roadless areas is the very best thing to do for health of this planet. The population is growing rapidly. (Individual, Lafayette, CO - #A807.70100)

At every opportunity I make a trip to my home state to regenerate in the Wasatch and Uinta mountain ranges. With increasing population growth it is imperative it seems to me to preserve and maintain roadless areas as roadless and wilderness areas. (Individual, Aubrey, TX - #A15526.70100)

Over the years, I have seen the impacts of population growth on the fragile ecosystems of our wilderness areas, and it is a disheartening sign of things to come as more and more people use the resources of our National Forests, be it recreational or commercial. Removing the Roadless Policy would be an irreversible action that would open up these areas and spoil these natural sanctuaries, I believe. (Individual, Broomfield, CO - #A6301.70100)

Washington State's population growth is burgeoning and many of the roadless areas contain trails that are used by our many new hikers. Mountain recreation is growing exponentially and many areas are very crowded. As sprawl envelopes the country we should be banking these areas for future generations. Let's put "conservation back into "conservative" and be a model for a world that is fast being trashed. (Individual, Seattle, WA - #A7086.70100)

#### **DUE TO THE HIGH NUMBER OF IMMIGRANTS**

I am writing to request that no changes be proposed or made in the present roadless policy. As additional hundreds of millions of immigrants, both legal and illegal, enter the U.S. in coming years we will need all the remaining unroaded wild lands that can possibly be saved. (Individual, West Linn, OR - #A687.70100)

It is imperative that the rules be unchanged when considering the immigration policy now in place and the unchecked flood of illegal immigration. A greater population will lead inevitably to greater environment damage. Please! Lets keep America Beautiful. (Individual, Yorba Linda, CA - #A3802.70100)

Since 1970 when I commented on the Rare II issue, this country's population has grown by 84 million. It will double by 2050, 90% due to our elected officials refusal to address immigration. This shortsighted population policy makes it imperative that we protect what little roadless areas are left. (Individual, Whitefish, MT - #A5594.70100)

The long term result of opening roadless areas and the wilderness involves some thinking. Firstly, should roads increase in the backwoods, the wilderness will gradually fragment as it is segmented piece by piece. Slowly at first for sure, which is why the short-term extraction profits are appealing right now, but add the projected, immigrant population growth for North America from places like Asia and Mexico and Latin America over the next 10-30 years (a factor short-term extraction industries or track-housing developers rarely consider), and that roadless areas/wilderness fragmentation will increase proportionally as the ecosystems are torn down for living space and urban sprawl. If you doubt that many immigrants are coming, please look at Vancouver, British Columbia and note the impact of surround, once roadless areas now being opened and cleared for an exploding Chinese population. The Chinese flee to Japan to make money with one goal in mind: to emigrate from China and immigrate to the space and 'freedom' of North American through Canada (permanent visa status for Chinese coming to America is still very difficult to obtain; Canada welcomes Chinese and immigrants with easy permanent visa requirements). A quick look at migration patterns across the globe will alert the Forest Service to this trend and, though the emphasis of the Forest Service these days mirrors the goals of a business, the fundamental paradox of capitalism no country can escape is that economic development erodes its own ecological base. (Individual, Saitama, Japan - #A26099.50300)

#### **DUE TO URBAN/SUBURBAN SPRAWL**

We simply must face the problem of urban/suburban sprawl and the need to cut back on our energy consumption or the cost will be great. If you think the short term slow down in productivity or economic strain is tough, just wait! Cleaning up the environment may very well bankrupt this country in the future. Or, we can simply decide human life is less valuable than once believed. Cancer, loss of clean air, and polluted waters are what we shall sow if ecologically sound principles are not followed. One key thing we can do is keep wilderness wild. Set aside what we can for now and for future generations. I endorse this roadless policy and know most Americans do also. Let's not let special interests supporting so-called wise-use (sic, develop and harvest it!) dictate our nation's environmental policy. (Individual, Bellingham, WA - #A1909.70100)

Dealing with the impact of growth is the number issue here in Colorado. My constituents fear losing the great quality of life we have. They recognize the importance of being good stewards of our natural resources and open spaces. They understand if we want clean air, clean water, thriving wildlife, we must be proactive with the necessary legislation and rules needed to protect and preserve what we have for generations who will follow. (Elected Official, State of Colorado - #A11820.70300)

More roads are just another form of urban sprawl. Forest animals do not need the noise and trouble brought to them by more roads. (Individual, Providence, RI - #A11478.70110)

I am all for increasing as much undisturbed forest lands as possible. I am in the building industry (house design) and believe developments can be much more concentrated with less sprawl. I know development does not affect much of the forest service property (at present). (Individual, Brevard, NC - #A151.70110)

The most spectacular characteristic of our great nation is its enormous stands of wild national forests. It literally breaks my heart to see them disappearing and concrete and asphalt replacing them. I live in the northwest and the trees are there one day and gone the next. I am angered and disappointed by this reckless use of one of God's greatest gifts to us . . . the BEAUTY OF HIS CREATION! We already have more new houses built than we can ever fill, and while they may be attractive places to live they

will NEVER compare to the beauty of a stand of an old growth conifer forest. (Individual, Vancouver, WA - #A1488.70300)

One of the greatest hindrances to effective forest management is encroachment of residential development into forested areas adjacent to public lands. This increases the difficulty of using prescribed fire and mechanical thinning to control fuel buildup, increases the risk of human carelessness causing fires which spread to the public lands, and increases the political fallout if fire crosses from public to private land. This issue should be addressed by funding development of guidelines and specialist teams to work with state and local authorities to put in place land use policies that keep development out of forested areas and away from public land boundaries. (Individual, Dallas, OR - #A3697.70110)

**704. Public Concern: The Forest Service should work with other government officials to promote population control.**

Please recognize that this issue is only one more symptom of a world out of control. We are beset by a host of environmental and social problems. They are solvable only if we recognize that overpopulation is at the root of them all. Please work with other government officials to help women—both domestically and abroad—learn about and control their own fertility. (Individual, Candler, NC - #A3068.70100)

**705. Public Concern: The Forest Service should not implement a national roadless rule.**

**BECAUSE ROADLESS AREAS HAVE NO INTRINSIC VALUE**

What values are there to consider in roadless areas. They have no value at all if there is no access. They are worthless except to a few greedy people who will only use that area to hike or camp in maybe once in a lifetime if at all. It can't be cleaned up with no roads in it, so you will be wasting your time cleaning up areas next to it, if a fire breaks out it will burn all areas anyway. (Individual, Escalante, UT - #A20305.45100)

**BECAUSE IT THREATENS WESTERN TRADITIONS AND CULTURE**

We are concerned about the protection of our western culture. This culture is characterized by access to the land for multiple-uses, friendliness, good neighborliness, and sharing. Motorized access to the land provides opportunities for sightseeing, exploring, weekend drives and picnics, hiking, skiing, mountain biking, riding horses, camping, hunting, fishing, viewing wildlife, OHV recreation, snowmobiling, gathering of firewood and natural foods, and physically challenged visitors who must use wheeled vehicles to visit public lands. Our observations indicate that over 90% of the visitors to the forest are within these profiles and rely on motorized access for their visits. We are fortunate to have extensive public lands to support the western culture. Western culture must be protected. We respect the use of public lands by others but they cannot trample our rights in return. Multiple-use management principles will protect western culture and values and the decision-making should be based on implementing a multiple-use alternative. The document should evaluate the multiple-use measures required to protect western culture and values. (Organization, Helena, MT - #A13226.70200)

**BECAUSE IT RESTRICTS FAMILY STABILITY AND TOGETHERNESS**

My family enjoys off-road recreation. It is the only time we are able to spend the quality time together they deserve. I am also able to teach the children about the environment and the outdoors. We have played together generation by generation and our family continues to stay together. We have learned through off-road recreation how to stay close and keep family a priority. Don't close the land, my family depends on it to keep us together. (Individual, No Address - #A567.70340)

Taking the experience of the family camping away will soon affect the family experience and will further reduce the morals and ethics of the future children. (Individual, West Jordan, UT - #A711.70340)

The forests belong to the people and the people in family units do in fact need to use the forests to the greater extent possible. By allowing the use of the forests in family units (whether it be a family of one, two, or five, etc.) the crime rates [that] result from inactivity or economics, could be drastically reduced both in and out of the cities. (Individual, Maricopa, CA - #A3732.70310)

There are many young families who belong to our club and enjoy snowmobiling as a family sport on federal lands. We know many other families who belong to the four-wheeler club. It is great to see these families enjoying the land and teaching their children to be responsible citizens. Please do not deny any of us access to those lands. (Individual, Riverton, WY - #A27896.70340)

Politicians talk about the American family and family values. I guess this must just be the current buzzword for the campaign trail. Because if any politician were to spend a weekend out in the desert or forest with the off-road community they would see Dad, Mom and the little one all gathered together, building a strong family bond. Enjoying the outdoors! They're not home doing one thing while the kids are watching all the crap on TV. They are out around the campfire, sharing their outdoor experience with one another. And you want to take this away. Just think in a couple of years they'll have to put together some type of environmental group to resurrect the soon to be extinct group know as the off-road community . . . Kind of like the spotted owl. (Individual, Valencia, CA - #A26162.70340)

#### **BECAUSE IT REDUCES MOTORIZED USERS' QUALITY OF LIFE**

Forest visitors use all of the motorized roads and trails that exist today. The use of this network of motorized roads and trails is part of local culture, pioneer spirit, and local tradition. The quality of life for the multiple-use public is being impacted by the cumulative effects of all motorized access closures. The significant closing of motorized routes in the project area does not meet the basic requirement of the NEPA act of 1969 as stated in "Sec. 101 (b) (5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities." A high standard of living includes recreation opportunities that meet the needs of motorized visitors. We do not understand why this area and many others in the National Forest cannot be shared with all forest visitors. The environmental document must evaluate the current allocation of motorized versus non-motorized recreation and access opportunities in the National Forest. A fair allocation would be based on meeting the needs of non-motorized and motorized visitors equally. The decision-making must provide for a high standard of living and equivalence in quality and opportunity for motorized visitors in comparison to non-motorized visitors. The environmental document must evaluate the impact of this proposed action and the cumulative impact of other decisions on environmental justice and the standards of living for multiple-use and motorized visitors. (Organization, Helena, MT - #A13226.70300)

#### **BECAUSE IT RUNS COUNTER TO AMERICA'S MODERN, FAST-PACED LIFESTYLE**

We live in a society where everyone lives by the clock. We are all trying to cram our recreation time into as efficient a package as possible. We are also living in a continually advancing technological atmosphere where faster and more efficient transportation is required to compete with the ticking of the clock. Common sense dictates that more of public land, as opposed to less, must be open to motorized transportation. The more time that passes, the more this will become what is needed to provide busy Americans with a positive outdoor experience. It may take 2 days to hike into a remote area to camp, and 2 days to hike out. That leaves 3 days for camping. The same remote area could be accessed by ATV in a few hours, leaving considerably more time to camp, with considerably less physical effort. This would allow the less than able-bodied citizens the same opportunities as the more physically fit. Ever tried to hike a couple miles toting 3 kids? Not a pretty site. Family outdoor recreation is being killed by these roadless designations. The young, able bodied, single enthusiast is being given more and more opportunities while the family is losing out. Who is going to look after our lands when these able greedy enthusiasts are through? The kids, I think we need to get the kids involved while they are young to foster future stewardship. (Organization, No Address - #A26800.70000)

**BECAUSE A WILDERNESS EXPERIENCE IS NO LONGER POSSIBLE DUE TO TECHNOLOGY**

Eliminate the notion of “Wilderness experience,” which really can’t be had due to cell phones, spy satellites, helicopters, medicine, hunting and fishing restrictions, fire use restrictions, convenient man-made backpacking equipment, et al. (Individual, Greeley, CO - #A28995.70300)

**BECAUSE IT WILL CAUSE EMOTIONAL DISTRESS TO MINING INDUSTRY EMPLOYEES DUE TO LOSS OF CONTACT WITH NATURE**

Many of our members, especially exploration geologists and drillers, entered their professions because of the opportunities to work close to nature. They pride themselves on being able to practice their respective arts in an environmentally responsible manner so they will not interfere with other long-term uses and values. These members and their families living in neighboring communities affected by the January 12 rule also would suffer extreme emotional distress, as well as a deep philosophical and cultural loss, by being prevented from enjoying existing and newly declared Roadless Areas in the same manner as they have for as long as six generations. Such a human toll cannot be measured in dollars. (Association, Spokane, WA - #A17351.70200)

**706. Public Concern: The Forest Service should ensure that activities on private inholdings are compatible with the social values associated with surrounding lands.**

Even the most broad property rights are not absolute, and need to be consistent with public responsibilities. Property rights regimes are a human construct, an overlay on underlying ecosystems. Activities on private inholdings must be compatible with the social values associated with surrounding lands, just as they are in more populated areas. (Individual, Corvallis, OR - #A650.70000)

*Bequest Values***707. Public Concern: The Forest Service should protect roadless areas for future generations.**

Seeing these remaining roadless areas (or just knowing they exist) has value to many Americans. This value however is not measured in terms of profit margins or portfolio balances but rather in a legacy that this generation can pass on to future generations. We must move beyond the mind set that our western lands are still part of a frontier that needs to be developed by government subsidies to extraction industries. (Individual, Evergreen, CO - #A430.70000)

It is the mission of the Forest Service to preserve and maintain the land set-aside by our government for preservation, conservation, and educational purposes. If we are to leave any part of the grandeur and magnificence that is so integral to the American spirit to future generations, we must allow the forest Service adequate room to fulfill the mission set before it. The Roadless Area Conservation Rule provides this room. Do not limit the ability of the Forest Service to preserve lands for the benefits of generations of Americans to come. (Individual, Conyers, GA - #A342.70400)

I am too old to be concerned about the welfare of our roadless areas - Wilderness - for my own use or benefit, but I adamantly support the right of future generations to have that privilege. (Individual, Willmar, MN - #A16939.70400)

I urge you to adopt a second metric for forest use planning which concerns sustainability—maintain the Forest in a fashion that future generations of U.S. citizens have use of those lands just like percent generations do. (Individual, Boulder, CO - #A26916.70400)

Through four decades, over 250,000 Outward Bound students have experienced the challenge, risk and adventure of a wilderness education course in the American backcountry. They have come to know the risks and rewards that come from testing one’s limits in areas beyond the reach of modern convenience

and technology. Proper protection of our remaining roadless areas will enable future generations of young Americans share in the experience. (Permit Holder, Golden, CO - #A29630.70300)

I voted for President Bush. I consider myself a conservative. I believe that being a conservative must include a dedication to conserving our nation's total resources for future generations. To be truly responsible and honorable, each generation must leave our country, and the world as a whole, in at least as good condition as it was in when we received it in trust. We have not been doing so, and that is wrong. It is long past time for us to change our ways. We can and must find ways to do this that are economically responsible and democratic. (Individual, Hopkins, MN - #A191.70400)

#### **BY USING TREE FARMS FOR TIMBER NEEDS**

The biggest consideration is that pristine areas of our National Forest are disappearing and will not be there for future generations. There are plenty of places to log, ever hear of tree farms. Try South Georgia or north Florida. They seem to be doing fine. (Individual, Atlanta, GA - #A4509.70400)

#### **708. Public Concern: The Forest Service should continue traditional multiple use management of roadless areas for future generations.**

I want my 2 and 4 year old Georgia grandsons to be able to visit their "papa" and enjoy backcountry fourwheeling, fishing and camping—responsibly! and that means continued access to our public lands. (Individual, Larkspur, CO - #A18020.70400)

I support the repeal of the inventoried roadless areas. I've lived in Utah for my entire life. I grew up playing in the mountains, camping, fishing, hunting, four-wheeling, hiking, and just driving the roads. I'd like my future children and grandchildren to grow-up being able to do the same. For this to happen the forest needs to be managed and protected, but this is going too far. (Individual, Tooele, UT - #A12640.70300)

#### **709. Public Concern: The Forest Service should protect national forests for the present population.**

Forget the "we need to leave something for our grandchildren" way of thinking. We need to give ourselves something. For many people, a trip to a National Forest is the only wildlife they experience. Capitalism is fine and good but do we really need a McDonald's on every corner? (Individual, San Antonio, TX - #A1185.70320)

#### **710. Public Concern: The Forest Service should exploit national forest resources for the present population.**

The idea that millions of acres of our national forests must be completely road free is ridiculous. Road free for what? If we have no access to them, it's as if we have no forests at all. It flies in the face of good, common sense. Wilderness is of no use to anyone if people are taken out of the equation. The earth itself is a useless ball of wasted mass if people are not there to use its resources and to care for it. But care for it doesn't mean let it go unused and its resources wasted, supposedly saved for some unknown and unspecified generation. This generation is as important as any future generation, and should have full use of the forests throughout this generation, while preserving the renewable resources for future generations. (Individual, Manti, UT - #A27830.70500)

### *Educational Values*

#### **711. Public Concern: The Forest Service should consider the educational potential of remaining wild forests.**

I especially value the educational potential of our remaining wild forests, especially as our increasingly urban society grows increasingly disconnected from the natural processes that make life, as we know it possible. Without understanding and appreciation for the natural processes that sustain us, we lose our

ability to see the connections between healthy functioning ecosystems and our personal lives. This disconnection plays a significant role in the ecological crisis that we now face. Mass extinctions, air, water and soil pollution, and the general degradation of our living Earth are all symptoms of our loss of connection with the wild. Ultimately we must ask ourselves what kind of world we want to pass on to our children and grandchildren: a world homogenized and marginalized due to our shortsighted decisions to not protect our remaining wild lands; or a vibrantly diverse world where functioning ecosystems and protected wild forests are an integral part of our cultural heritage? (Professional Society, El Cajon, CA - #A5016.70000)

Within the Forest Service, the phrase "Recreation Opportunity Spectrum" is well known. For purposes of these comments "recreation" will be set aside to focus of the concept of the opportunity spectrum available in wilderness, roadless areas and other backcountry or non-developed venues. For Outward Bound, the issue is one of appropriate classroom space. For four decades, wilderness, primitive and roadless areas have been our classroom and teacher. In places such as Rocky Mountains of Colorado, the Cascades of Washington and Oregon, or the Sierras of California, Outward Bound has tapped the educational value of remote backcountry venues. Today, in all of these areas, Outward Bound is working to reduce our impacts on the wilderness classroom. This is particularly true in designated wilderness. Wilderness use is increasing. The capacity the Forest Service to effectively administer and manage these areas is declining. As a result, Outward Bound, and others like us, want to look, need to look, for a range of effective classrooms or program areas, including wilderness, primitive, roadless areas and others. Roadless areas have, can, and must continue to play a critical role in providing a spectrum, of backcountry opportunities and experience. (Permit Holder, Golden, CO - #A29630.70000)

**712. Public Concern: The Forest Service should educate children regarding our dependence on undisturbed natural systems.**

Please do not overturn a sensible ruling as a result of pressure from those who feel that a natural resource serves our purposes only, these are ignorant (yes I realize I may alienate some, but it really is a lack of education, as we should be educating our children in the ways in which we are dependent upon undisturbed natural systems for our life, this no one can deny) people concerned with profit for some company whose shareholders are of those ignorant masses. (Tribal Department, Mescalero, NM - #A4905.70500)

*Access for Special Populations*

**713. Public Concern: The Forest Service should not implement a national roadless rule that restricts access for the mobility-impaired.**

**THE ELDERLY**

I am 67 years old, I have been hunting and fishing in my tax supported national forests since I was 5 years old and I will continue. Just let me use the roads that are already there except in wilderness areas. Public lands should be accessible for senior citizens also. (Individual, Mesa, AZ - #A99.70700)

Please do not close forest roads. I am 65, retired and love to spend time out in the hills. I cannot hike like I did when I was 20, I need access by vehicle. I understand you are talking about closing roads (call them trails if you like) that I have used for 40 years. Access does not require a lot of maintenance, graveled and graded roads are not necessary in many cases. Contrary to the environmental groups, roads do not cause any significant damage. (Individual, Salt Lake City, UT - #A705.70700)

**THE DISABLED**

I am a Viet Nam Vet with some limited physical abilities. I believe that the recent conversion of public lands in the West to "wilderness" or "roadless" status has gone too far. I am supporting political groups and public groups that wish to stop the increased designation of "roadless" areas. I will also vote for public officers who agree with my stance. The only way I can visit and enjoy some of these areas is by

Jeep and I do not consider that an intrusion or damaging situation. (Individual, Aurora, CO - #A538.70700)

I help pay for the national lands and access for all is reasonable, even people like myself who have mild handicaps that limit how far we can walk. (Individual, No Address - #A917.70700)

I am strongly opposed to any actions that would reduce the accessibility of the national forest system in any way. Indeed my wife is handicapped with constant pain and limited motion. If our forestlands and parks are truly to be open to all people then please consider our position. The only way my wife and many other people will be able to enjoy these public lands is from the seat of a vehicle. These vehicles can only be useful if they have access. My family and I have dreams of travel to Yellowstone Park someday. With her discomfort during travel and the current status of massive crowds during the warmer months we are considering the winter as an alternative. I understand that the opportunity to do so may be limited to specialized mass transit vehicles or foot travel during the winter months. We do not consider this an acceptable alternative. (Individual, Brighton, MI - #A10549.70700)

I am very concerned for the proper management of the forest; for all outdoor users including the elderly and handicapped. I believe a scientifically managed program can be developed which includes a reasonable access for the elderly and handicapped. (Individual, Iron Mountain, MI - #A11408.70700)

I am a C-5 quadriplegic and I like to hunt and fish. I ride in a small trailer pulled by an ATV. This is the only way I can access the woods to hunt and fish. I'm not the only disabled person that hunts in this manner. A person that is a paraplegic can ride most ATV's but a quadriplegic like myself has to use trailers. Please keep this in mind when making new regulations. In Louisiana the Wildlife and Fisheries make special trails in the Wildlife Management Areas for disabled hunters and special places by streams, rivers, lakes and ponds for the disabled to fish. Without roads and trails the disabled hunter and fishermen are denied access to the woods and streams. Please keep this in mind. (Individual, Westwago, LA - #A7465.70700)

The Forest Service is under no legal obligation to provide handicapped access to the forest—a fact that was thrown in my face at least a dozen times. All “officials” were ambulatory, standing on two feet, and quite arrogant about a law they apparently memorized the night before. No one even offered a solution for my physically challenged readers. I guess the Forest Service’s “Roadless” initiative is above moral concern. There but for the grace of God go I. (Individual, Tucson, AZ - #A5278.70700)

#### **714. Public Concern: The Forest Service should not implement a national rule that closes existing roads.**

##### **BECAUSE IT WOULD RESTRICT ACCESS FOR THE MOBILITY-IMPAIRED**

I have been hunting and fishing the public lands all my life. I did so with my father and grandfather, and continue to do so with my wife and children. It would be outrageous if these lands were closed to vehicle access now. I am not requesting new roads, only that the current roads continue to be responsibly used and maintained. There are places that my father still loves to go and could not access any more without a vehicle. The same goes for my children. These are public lands and should remain public lands, access as is, and never denied as long as we, the sportsmen and women, the original and true conservationists of this nation, continue to use them. (Individual, Gardnerville, NV - #A4157.70700)

My legs and feet are not the best. The only access I have to these areas are through the old logging roads with my truck. It's breaking my heart to see favorite roads ripped out because someone doesn't like a quad runner or my truck. I am part of the public too and really resent having more of my freedoms removed. In this case it is my freedom of access. I desire to get into the back country also but because I can't walk 20 miles a day anymore, it's too bad? I can't walk on ripped out roads. My legs can't take

that terrain. I have walked many miles on old logging roads and marvel at the old cabins we find. Tearing out these roads narrows down the number of people who can use these areas. (Individual, Bountiful, UT - #A21161.70700)

**715. Public Concern: The Forest Service should not use access for the elderly and disabled as an excuse to build roads in roadless areas.**

I grew up in the mountains of Montana and we visit there often. My wife and I enjoy hiking in the mountains but because of physical disabilities, we cannot hike as much. So we now see the “back country” by driving Forest Service roads. However, we do not want any more roads in our national forests. In fact, we would prefer that more roads were closed, even if it means that we will not be able to see as much. It is enough for us to know that the forests are protected. (Individual, Rockford, IL - #A6270.70700)

I do not buy the idea that handicapped persons need to ride motorbikes. I’m handicapped, too, have never been able to balance on a bike or motorbike; my ears are very sensitive to noise. (Individual, Tacoma, WA - #A11709.70700)

I’m 70 years old with bad knees, but I still want the existing roadless areas to remain roadless and would like to see more wilderness areas. (Individual, Fruita, CO - #A7591.70700)

Now a senior citizen, I still would prefer an easy hike into our beautiful backcountry, than taking a vehicle in with all its destructive impacts. The forests of Basalt Mountain are an example where one can drive fairly close by and then walk into still unspoiled forests which have not been marred by roads and vehicles. (Individual, Snowmass, CO - #A5718.70300)

The roadless policy would not close off any trails available for hiking, mountain biking, or horseback riding; that defines “reasonable access” in wilderness areas. Some have argued this policy would prevent handicapped people from accessing all National Forest lands; and we need to do a better job of making more areas already roaded accessible to them with trails they can use. But it is not possible for someone in a wheelchair to climb Mt. Everest, and no one is advocating a paved trail all the way to the top. There are some areas that are, by nature, wild—and should be left that way. (Individual, Cumming, GA - #A21156.70700)

Non-motorized recreation is a valid use of public land, and more and more people are seeking the solitude and quiet that roadless lands can offer. I am over 50 years old and intend to use public roadless lands by walking until I no longer can. Then I will be glad to know that they are still there and that the flora and fauna supported by such lands are still intact. I do not think I need to change the character of the land I love to insure my own “pleasure” as some motorized users apparently do. (Individual, Clancy, MT - #A17117.70320)

**BECAUSE AMPLE ACCESS EXISTS IN ROADDED AREAS**

Some roadless opponents argue that maintaining the status quo in currently roadless areas would be unfair to the disabled and the elderly. However, those who cannot, or choose not to, walk or ride a horse are accommodated by the current road system. There are 380,000 miles of roads in the National Forest system, more than 30,000 miles in Montana alone. I no longer have the energy and endurance to hike as I did for more than 50 years. However, I am not so self-indulgent that I now want roads built to wild places I can no longer reach. One doesn’t need to be physically present in wild country to appreciate its existence. I am most concerned about perpetuating wild country experiences for my five children and five grandchildren. I do not believe most people are absorbed with doing only those things that are simple and require no effort. Future generations deserve our prudent care of roadless areas. As Aldo Leopold wrote, more than half a century ago: “Recreational development is a job not of building roads into lovely country, but of building receptivity into the still unlovely human mind.” (Individual, West Glacier, MT - #A5946.70000)

ORV groups have argued that the roadless proposal discriminates against motorists and the handicapped. This hollow argument lacks substance. In reality, the number of handicapped people who desire access into remote roadless areas is extremely small. Of course, the handicapped, elderly, and motorists currently enjoy access to all of our national parks and the great majority of National Forest lands. It is not reasonable or prudent to believe that incapacitated or motor-bound persons should be allowed access to every last remote place in our country. We all have our limitations; many of us are not capable of mountain climbing, for example. No one is advocating the construction of a road to the summit of Everest just because some people are denied access. Those confined to vehicles enjoy excellent access to most of our natural wonders, it is not reasonable to expect that they will be able to travel to every last corner of our wild lands. (Individual, Durango, CO - #A5420.70700)

Political rhetoric of locking up the forest to motorized users has been used to slant the process away from protecting roadless areas. The reality is that there is an over-abundance of roads on public lands now. A recent study done for the southern Rockies Ecosystem project produced GIS mapping of roads within my region. The area reaches from southern Wyoming to northern New Mexico and is bounded on the east by the Great Plains and the west lies on eastern border of Utah. This included National Forest, BLM, and private land GIS map coverages in the database. One map that was generated from the data showed the distance one could get from the nearest road. In the analysis, 93.8% of the land base was within 1/2 miles of an existing road. How well does this fit with the average person's desire for the wild, rugged, wide-open spaces that bring them to the west and National Forests?

I have visited many designated wilderness areas over the years, and managed a few in my career. As a younger man, I was driven to visit these areas for the soul-nurturing solitude they provided. After several decades of familiarity, I now have come to realize just how small these areas are. Even in the larger wilderness areas designated in the original act of 1964, there are only small portions in each where one can be 5 miles or more from a road. The vast majority of land even in designated wilderness areas is within less than 3 miles from a road. In the entire southern Rockies only 1.2% of the land base is over 4 miles from a road. (Individual, Penrose, CO - #A21448.70320)

## **716. Public Concern: The Forest Service should protect roadless areas from timber removal.**

### **TO PRESERVE OPPORTUNITIES FOR THE DISABLED TO EXPERIENCE UNSPOILED NATURAL AREAS**

I want to express my opposition to any proposed changes to the Roadless Rule that would weaken the protection that your agency has already granted in the Tongass National Forest. ORCA (Outdoor Recreation and Community Access) uses and depends on the Tongass for almost all of our activities. Last year a group of Southeast Alaskans with severe physical, mental, and developmental disabilities kayaked from Hoonah to Tenakee. This was a life-changing experience for all involved. This year the area is facing the chopping block. Our program offers kayaking, hiking, fishing, and sailing all within the Tongass. Imagine the experience a few years from now when we take our clients to a barren wasteland and tell them about all the opportunities that used to exist in the Tongass. ORCA's continued use of these areas depends upon them remaining pristine and undeveloped. There are already 4,650 miles of roads and millions of acres of the Tongass that are developed. Leave the remaining Roadless Areas wild. (Organization, Juneau, AK - #A24938.70300)

## **717. Public Concern: The Forest Service should allow some exceptions to a national rule to facilitate access by the disabled.**

There should be trails within roadless areas that any disabled, handicapped, or elderly citizen will be able to access these areas with a motorized conveyance. These citizens deserve the right to utilize these lands. If they are not able-bodied enough to do so without the assistance of a conveyance, they should not be denied access, and an electric wheelchair is not a conveyance which can navigate any terrain, or snow. They should be allowed to utilize ATVs, snowmobiles, trail bikes, or automobiles whenever and wherever need be. (Organization, No Address - #A26800.70700)

Great question, been there too. Yes, very difficult to satisfy everyone, but my response is we have plenty of roaded national forest acres and areas. Every motorized aficionado has plenty of great places to go and see a motor under the hood or between their legs. Leave something behind as a legacy of what's left of the natural or nearly so landscape of our great continent for current and future generations to see. In fairness to those who are mobility impaired, I would like to see a flexible approach or policy that would allow on occasion, motorized transport of such individuals so they too can enjoy and see what an area undisturbed or largely undisturbed by development looks, feels, smells, and even tastes like if they so desire. (Individual, Olympia, WA - #A28646.70700)

**718. Public Concern: The Forest Service should exempt ski areas from a national rule.**

**TO ENSURE ENVIRONMENTAL JUSTICE TO LOW-INCOME FAMILIES**

Sipapu's ski school program teaches more than 1,300 students from 45 different schools each year in multi-week programs at very affordable rates. Sipapu's inability to provide these services in the future would be an "Environmental Injustice" for the low-income families in Northern New Mexico. (Permit Holder, Vadito, NM - #A20142.75310)

*Health and Wellness Values*

**719. Public Concern: The Forest Service should protect roadless areas.**

**FOR HUMAN HEALTH AND WELFARE**

I strongly believe in the preservation of wilderness as a key to the health and welfare of human beings. (Individual, Boulder, CO - #A212.70300)

I am a clinical psychologist and healthy lifestyle behaviors are a significant professional focus. Research, clinical practice and personal experience have combined to reinforce the value for health and psychological well-being of time spent exercising on a daily basis in natural settings. While we do not all have ready access to roadless areas, the more natural vegetation, free flowing waters and undisturbed landscape, the less noise, the cleaner the air and bluer the sky, the greater is the spiritual renewal derived from an excursion into the natural world. Peace of mind seems to be an increasingly expensive commodity in our society. Precious are the avenues to achieving it. (Individual, Needham, MA - #A15773.70320)

**FOR PHYSICAL AND EMOTIONAL REJUVENATION**

To me, roadless areas are places where humankind is a visitor and guest. Traces of man should be non-existent. The only signs that do exist are those of wild indigenous inhabitants. I rely on roadless areas to rejuvenate myself both physically and emotionally. (Individual, Aspen, CO - #A5116.70000)

Our population continues to demonstrate by its use patterns that people need quiet, wild places to visit to regenerate themselves physically, mentally and spiritually. We are on the right track toward accomplishing this most important goal. I implore you to keep us moving steadfastly in that direction. (Individual, Charlottesville, VA - #A4886.70300)

**FOR WOMEN'S SAFETY**

Roads in the Western forests bring pick-up trucks carrying men with guns, fugitives from the law, and teenagers looking for excitement or on a drunk. As a woman who enjoys being in nature as my primary leisure activity, I often avoid roaded areas in the National Forests not only because they are relatively unpleasant, [but] because I think they may be dangerous. Roadless areas, on the other hand, provide peace and tranquility and a sense of safety that I find nowhere else in our increasingly troubled society. (Individual, Victor, ID - #A20625.70320)

**FOR HUMAN SAFETY**

This road runs along a steep mountain slope where there is a government recognized and mapped geological fault where one part of the mountain is sliding over another and there is ongoing shifting masses of earth, but the U.S. government has also chosen to implement a timber sale that will dramatically increase dangers to human life. How can anyone justify voting for a rule that prioritizes timber sales over human life? (Individual, No Address - #A27962.70300)

**FOR WILDERNESS THERAPY OPPORTUNITIES FOR YOUNG PEOPLE**

We use the backcountry wilderness to help treat our students. If the areas we use were full of logging trucks and oil exploration equipment, our students would lose the effect of wilderness therapy. In fact while I was writing this letter, a student that had transitioned into our resident part of our program came to visit me. He had a difficult time last night and is returning to the wilderness for two days to try to clear his head. As you can see, the wilderness is an invaluable healing tool for our students. (Individual, Georgetown, CO - #A18074.70300)

Now I am “home” with my parents near Washington D.C. and I work with children and teenagers—I take them canoeing and rock climbing—I take them to where there are no roads, where many of them for the first time are in a setting where traffic is not a background noise, and I see what a transformative affect it has on these children, many of whom have difficulty in school, drugs, or with the law. I share these memories of mine with the idea of creating an impression of the value of wild places, and the importance of this land to the future generation. I am made to understand that you have the awesome role of determining the fate of America the Beautiful, of a say at least, in reserving the last remaining tracts in the condition the Creator said was good, and I ask that you do all you can for the future generations to ensure that is still good. (Individual, No Address - #A4605.70400)

**720. Public Concern: The Forest Service should not implement a national roadless rule.****THAT WOULD HAMPER SEARCH AND RESCUE EFFORTS**

We need **access for search and rescue efforts**. The cost and effort required for search and rescue in the absence of roads is very high in time, money, safety and lives. (Individual, West Point, UT - #A5415.90120)

**721. Public Concern: The Forest Service should protect roadless areas and discourage motorized recreation.****TO HELP COMBAT THE NATIONAL OBESITY EPIDEMIC**

One of America’s biggest national problems is obesity. Encouraging people to rely on motorized transportation for their ongoing activities contributes to this endemic health issue Americans manifest. We hike, fish, bird watch, camp, and enjoy our national forests tremendously. Hundreds of thousands of miles of roads exist in our forests now. Let’s do all we can to keep as many areas “roadless” as possible. We owe it to future generations. (Individual, Anderson, CA - #A7052.70400)

**722. Public Concern: The Forest Service should make special land use permits available to citizens disabled by Toxicant Induced Loss of Tolerance.**

Special permit land use should be made available to citizens disabled by Toxicant Induced Loss of Tolerance who can no longer tolerate even low levels of common chemicals. If America can provide sanctuaries for bears an other endangered species, we “ought” to provide sanctuary for fragile humans. (Individual, Marion, NC - #A4691.70700)

## Noise

### **723. Public Concern: The Forest Service should establish baseline sound levels and quantifiable noise standards for roadless areas.**

#### **TO REDUCE STRESS**

##### PROTECTION OF "THE NATURAL QUIET" AND A "NATURAL NIGHT DARKNESS"

To escape from the unwanted stress-producing sounds, noises, and (nighttime) lights of "urban life" and to experience the "natural quiet sounds" and a "naturally dark night sky" of the "great-out-of-doors" are issues, I feel, of great importance to many. Motorized vehicle noise and lights and air overflight noise are obnoxious to many, and efforts should be made (a) to document a baseline of the "natural (sounds and) quiet" in various parts of these areas, and (b) to establish quantifiable noise and audibility standards and criteria to help determine what types and levels of man-produced sounds, including military, commercial, or other air overflights, constitute an unacceptable "pollution" of the "natural sounds and natural quiet." (Individual, Bishop, CA - #A20954.70320)

### **724. Public Concern: The Forest Service should establish a reasonable decibel limit for exhaust systems.**

#### **TO DECREASE CONFLICTS BETWEEN MOTORIZED USERS AND OTHER RECREATIONISTS**

Conflicts with other recreationists were often associated with sound. During the 1970s, when the orders were developed, snowmobiles and motorcycles were much louder than today's machines. Concern with sound levels may have led to the creation of Executive Orders 11644 and 11989. Today's technology provides machines that are significantly quieter than in the 1970s. Furthermore, the technology exists to make motorized vehicles even quieter. Therefore, concern with sound can be mitigated by establishing a reasonable decibel limit for exhaust systems. States such as California and Oregon have enacted sound emission limits. Public land-use agencies could establish reasonable sound limits and use this approach to address the sound level issue. Why hasn't this been done? This solution is more equitable than closures. This issue must be addressed in the document and decision-making. (Organization, Helena, MT - #A13226.15168)

### **725. Public Concern: The Forest Service should not arbitrarily require roadless areas to have semi-primitive core areas in order to qualify as inventoried.**

#### **BECAUSE A COMPLETE ABSENCE OF SIGHTS AND SOUNDS FROM SURROUNDING AREAS IS NOT POSSIBLE, PARTICULARLY IN THE EAST**

Definition of "solitude" should not require cores of Recreation Opportunity Spectrum categories of Semi-primitive Non-Motorized or Semi-primitive Motorized lands as was done in the SAA roadless inventory. Nor should the agency's consideration of "whether and how to protect roadless characteristics" (dispersed recreation) be dependent upon the presence of these ROS categories (see DEIS A-13-14). Definition of ROS categories is oftentimes a cartographic and/or computer based exercise that may not reflect the reality of on-the-ground roadless recreational opportunities. Also, definition of "solitude" should not require absence of "sights and sounds" from surrounding areas throughout the roadless area, especially not east of the 100th meridian. Because of the on-the-ground reality of the terrain in Virginia and many other places (e.g., ridges and valleys with long sight lines) such an all-pervasive "absence" is simply not possible. Although the "zone of disturbance related to road noise [for wildlife] is estimated to be as great as one-half mile in forested areas"(DEIS 3-71), the writer of these comments can attest to being disturbed in Virginia NFs by intrusive motor noise originating from a much greater distance. This is just one more piece of evidence of the need for expanded roadless area protection. Demand for Semi-Primitive and Primitive "dispersed recreation opportunities is increasing . . . in an environment of diminishing supply." (DEIS 3-122). (Individual, Staunton, VA - #A29325.70320)

The FS defines recreational opportunities by the amount of roads an area has, or its distance from them. To be officially "Primitive" a tract of land must be at least 3 miles from an open road. Our forests are so heavily roaded that there is not a single Primitive recreational area available in any eastern National Forest. Sometimes we cannot escape from the sight or noise or smell of machines no matter how hard we try. Imagine how bad it must be if you are somebody (e.g. a bear) who actually has to live in these woods. (Individual, Staunton, VA - #A29325.70320)

## Adequacy of Analysis

### Summary

Some people question the sociological research and analysis that was conducted in preparing the Roadless Area Conservation Rule Draft EIS. These respondents state that residents in rural, forest-dependent communities were unfairly portrayed in a negative light, and ask that the Forest Service reject those studies and acknowledge positive attributes of these communities. Conversely, one respondent asserts that his personal experience as a law enforcement officer corroborates the view that commodity-dependent communities suffer negative social impacts, and urges the Forest Service to adopt a national rule.

#### **726. Public Concern: The Forest Service should reconsider sociology studies that portray rural residents in a negative light.**

Conservation groups and many rural sociologists, especially from University Sociology Departments, portray rural Americans in a very negative light. They conduct "studies" that show that rural areas are "economically depressed (or distressed)" because their incomes are not up to their standards. The truth is that rural residents trade the higher incomes they could make in the cities for the cultural and social values they enjoy living in rural areas, especially when they are raising their children. When this question comes up, please consider the fact that millions of Americans work for years in the cities so they can retire in the country. Rural "values" are not easy for many urbanites to understand, but they are very real and we adamantly defend those values and rural lifestyles.

Another social issue they "study" is education. They have successfully painted rural American school children as being under par with lower grade-point averages, or "below" the national standards. This is also a farce and is simply not true. Rural schools may not have the computer capabilities and other amenities of urban schools. But rural parents are more involved in their schools and their children's education and lives. Many children choose to follow the same occupations of their families, such as ranching, farming, logging, mining, recreation, and tourism. Some of those occupations do not require college degrees. But they do require the opportunity to pursue them. Rural areas provide those opportunities, and additional education can be obtained if necessary. When FS considers "values" those negative studies should not be used as a controlling factor in its decisions and should show more respect for rural American values, culture and society. (Organization, Three Rivers, CA - #A28739.70130)

#### **727. Public Concern: The Forest Service should consider that commercial resource users create negative social impacts in rural communities.**

I work as a law enforcement officer and am fortunate to serve a very peaceful community. I fear that by scaling back the roadless policy, industries like oil and gas and logging will begin to have a negative effect upon the peace of my community and many communities whose way of life depends on the wildlands near it. The type of people these industries attract are not the type of people I want in my community. From my experience, the employees of these industries are a black eye in the community. Alcohol abuse and a blatant disregard for law enforcement runs rampant among the employees of the extractive industries. I look at communities built around oil and gas, logging, and mining. They are marred with law enforcement challenges. Jackson Hole and many other communities along the Rocky Mountains do not need this headache and burden. (Individual, Jackson Hole, WY - #A30312.70000)

## Economic Environment and Values

This section includes six subsections: Economic Environment and Values General, Evaluation of Roadless Areas, Adequacy of Analysis, Economic Effects, User Fees, and Subsidies and Agency Expenditures.

### Economic Environment and Values General

#### Summary

A number of respondents discuss economic values at some point in their response to the Advance Notice of Proposed Rulemaking. Overall, the public asks that the Forest Service make sound economic decisions and only permit activities with positive economic benefits. Some respondents assert that commodity values are most important, while others suggest consideration of a broader array of economic values.

#### **728. Public Concern: The Forest Service should make sound economic decisions.**

Now is a difficult time. Our energy prices are at an extreme high, and our economy is slowing down. Let's not panic and make rash decisions. Let's make the right choices for the long haul. (Individual, Peterborough, NH - #A205.75000)

#### **BY ADOPTING THE ROADLESS AREA CONSERVATION RULE**

The Roadless Plan makes economic and fiscal sense. The Forest Service currently has an \$8.4 billion backlog of maintenance and construction on its existing 386,000 miles of roads in the national forests and grasslands. Many of these poorly maintained roads contribute to environmental threats to fish and wildlife by causing soil erosion in fish spawning areas and by damaging water quality. Building more roads into roadless areas while allowing the backlog of repair and construction on existing roads to go unaddressed is ludicrous. (Individual, Ethel, WA - #A11767.17240)

A reason to generally prohibit road construction in roadless areas is the cost of such construction. In Colorado, almost all easily accessible areas already have road access. Road construction into most of the remaining unroaded areas would be costly, difficult, and highly impacting to the environment. The value of any resources extracted from these areas, would probably not equal the cost of accessing and developing them, let alone justify the despoiling of the environment. (Organization, Denver, CO - #A12008.17100)

#### **729. Public Concern: The Forest Service should promote only economically viable activities within national forests.**

The only activities that should be promoted within National Forests are those which are economically viable. The Forest Service should also take into consideration issues such as watershed protection, endangered species habitat and other irreplaceable attributes when determining the most viable long-term uses of public land. (Individual, Skokie, IL - #A529.75100)

## Economic Evaluation of Roadless Areas

### Summary

**General Comments** – Members of the public suggest a wide variety of evaluation criteria which, they assert, the Forest Service should use when conducting roadless area evaluations. Suggestions range from considering purely economic values—especially of commodity resources—to a combination or ordered hierarchy of economic, social, and environmental values. Some state that the Forest Service has already adequately evaluated the economic contributions of roadless areas, and has determined that timber resource values are insignificant in comparison with other benefits; thus no further analysis is necessary. Likewise, some alleges that the Agency continues to over-emphasize market values, and should more effectively balance these against non-market and social values. Finally, some respondents state that it is not appropriate to consider economic values at all when conducting roadless area evaluations.

**Comparative Costs and Benefits of Ecosystem Protection and Resource Extraction** – A number of people frame their comments as a comparison between competing forest management activities and human activities. As such, respondents compare activities which, they believe, are mutually exclusive and request the Forest Service to favor one over the other based on economic reasons. There are those who suggest that recreational activities should be favored over commodity management due to economic advantages. Others assert that the Agency should emphasize profitable and moneymaking activities over those that do not pay, favoring commodity use over recreation or preservation. A number of respondents ask that the Forest Service better account for long-term rather than short-term benefits when evaluating roadless areas.

### **730. Public Concern: The Forest Service should consider only economic values.**

The Forest Service should take only economic values into consideration. (Individual, Port Townsend, WA - #A964.17000)

The Forest Service has more than adequate information on the value and considerations to be taken due to past planning efforts, EIS and environmental impact studies. We do not believe that efforts should be made to expand these. In fact, they should be identified in the forest planning process only to the extent of economic impact. (Organization, No Address - #A30026.45100)

### **731. Public Concern: The Forest Service should not base the value of the land on the value of the resources that can be removed.**

The values of roadless areas are innumerable, but basing the value of these lands on the value of the resources that can be extracted from them is ludicrous. (Individual, Portland, OR - #A13949.45100)

#### **DO NOT CONSIDER THE HISTORIC ECONOMIC COMMODITY VALUES OF THE LAST FIFTY YEARS**

The USFS should focus on alternative values, not the historic economic extraction values of the last 50 years that have not put the USFS in the place it is today! The USFS manages roadless areas that are of international value for scenery, wildlife, air quality, and backcountry experience. The USFS needs to get into the 21st century and consider values other than resource extraction as priorities. Demographic issues in respect to socio-economic outcomes of roadless enactment is a marginal issue on the national level. (Individual, No Address - #A15444.45100)

**732. Public Concern: The Forest Service should describe values in terms of cost/benefits or some other economically definable method.****BECAUSE VALUES ARE MEANINGLESS WITHOUT AN ECONOMIC ANALYSIS THAT CAN BE PEER REVIEWED**

“Values” must represent the potential to affect the local economy—positively or negatively.

“Values” need to be described in terms of cost/benefits or other economically definable method. Subjective evaluations are basically a report writer’s opinion. This is political management. Without an economic analysis that can be peer-reviewed values are meaningless when we are discussing public land policy. (Individual, Libby, MT - #A10531.45000)

**733. Public Concern: The Forest Service should consider relevant economic factors in second-stage roadless area evaluations.**

Relevant economic considerations for the second-stage roadless area evaluations [following evaluation for wilderness designation] include, but are not limited to: mineral values accessible without use of roads; current and future hunting and fishing use expressed as wildlife and fish user days (WFUDs); recreation use of the area expressed as recreation visitor days (RVDs); grazing uses; and water uses. (Civic Group, Roanoke, VA - #A1713.75000)

**734. Public Concern: The public should evaluate roadless areas, first according to economic considerations and second by social considerations.**

What are the characteristics, environmental values, social and economic considerations, and other factors the forest Service should consider as it evaluates roadless areas? The FS shouldn’t do the evaluating, the public should, and the public should be governed first by the economic considerations: Are there minerals there we could extract? How much merchantable timber is there, and what’s the best way to get it out? Would it be suitable for grazing? Could the ground be used for other purposes such as a ski area, a golf course, etc. Second, by social considerations: How will this affect my community? My state? (Individual, Philomath, OR - #A943.75000)

**735. Public Concern: The Forest Service should give equal weight to the economic value of roadless areas as intact ecosystems as to other economic values.**

We need to stop thinking in terms of all public lands having nothing more than dollar values (i.e., needing to be “harvested,” “utilized,” “healthy,” and other code-words meaning “exploited for profits”). Public lands left in their natural, wild state have tremendous values in themselves. Recreation in these areas, for example, actually has much higher dollar values in economic terms than logging, mining, and drilling, if that is how we must evaluate their worth. (Individual, Cumming, GA - #A21156.75000)

The economic value of the roadless ecosystem itself should receive as equal weight as other economic factors, such as use by local communities. The value of roadless areas in terms of services and economics is not easily traced through classically defined financial markets. The benefits of clean air, clean water, soil, climate, recreational lands, healthy forests should all be considered in their economic terms. This can be accomplished and estimates exist (Sullivan J and Krieger G Environment and Health: Going into the Twenty-First Century, Chapter 1 in Clinical Environmental Health and Toxic Exposures, Lippincott Williams and Wilkins, Philadelphia, 2001). The Forest Service should not use traditional economic benefit alone (logging, mining, recreation) any more than it weighs the economic benefit of a roadless area in and of itself for its overall ecosystem services. I would subjugate local economic values to the overall economic value of an intact ecosystem or roadless area. (Individual, Tucson, AZ - #A872.75000)

I urge you to read the enclosed article *Economic Laws Clash With the Planet's* and accept these comments also as if they were my own in response to the Roadless Area Conservation Advance notice of proposed rulemaking.

“The first commandment of economics is: Grow. Grow forever. Companies must get bigger. National economies need to swell by a certain percent each year. People should want more, make more, earn more, spend more - ever more.

The first commandment of the Earth is: enough. Just so much and no more. Just so much soil. Just so much sunshine. Everything born of the Earth grows to its appropriate size and then stops. Its creatures learn, mature, diversify, evolve, create amazing beauty and novelty and complexity, but live within absolute limits.

Now, when there's an inconsistency between human economies and the laws of planet Earth, which do you think is going to win? . . .

Economics say: Use it up fast. Don't bother with repair; the sooner something wears out, the sooner you'll buy another. That makes the gross national product go round. Throw things out when you get tired of them. Throw them to a place where they become useless. Grab materials and energy to make more. Shave the forests every 30 years. Get the oil out of the ground and burn it now. Make jobs so people can earn money, so they can buy more stuff and throw it out.

The Earth says: What's the hurry? Take your time building soils, forests, coral reefs, mountains. Take centuries or millennia. When any part wears out, don't discard it, turn it onto food for something else. If it takes hundreds of years to grow a forest, millions of years to compress oil, maybe that's the rate at which they ought to be used.

Economics discounts the future. Ten years from now, \$2 will be worth \$1. You could invest that dollar at 7 percent and double it in ten years. So a resource 10 years from now is worth only half what it's worth now. Take it now. Turn it into dollars.

The Earth says: nonsense. Those invested dollars grow in value only if something worth buying grows, too. The Earth and its treasures will not double in 10 years. What will you spend your doubled dollars on if there is less oil, soil, dirtier water, fewer creatures, less beauty? The Earth's rule is: Give it to the future. Lay up a fraction of an inch of topsoil each year. Give your all to nurture the young. Never take more in your generation than you give back to the next.

The economic rule is: Do whatever makes sense in monetary terms.

The Earth says money measures nothing more than the relative power of some humans over other humans, and that power is puny, compared with the power of the climate, the oceans, the uncounted multitudes of one-celled organisms that created the atmosphere that recycle the waste, that have lasted for 3 billion years. The fact that the economy, which has lasted maybe 200 years, puts zero value on these things means only that the economy knows nothing about value - or about lasting. . . .

We don't get to choose which laws, those of the economy or those of the Earth, will ultimately prevail. We can choose which ones we will personally live under - and whether to make our economic laws consistent with planetary ones, or to find out what happens if we don't. (Individual, Mena, AR - #A11984.70500)

### **736. Public Concern: The Forest Service should recognize that roadless areas do not contain economically viable timber resources.**

By and large, National Forests were created from the dregs of the forested lands in the public domain. And the remaining roadless land is the worst of the dregs. If they were primarily valuable for timber, minerals and grazing they would already have been developed. It appears to me the highest and best use is to leave the land undeveloped. Leave them just as they are today! (Individual, Hamilton, MT - #A5811.10111)

It is my personal opinion that the roadless initiative as already developed has received about as many million comments as could possibly be desired. What is incomprehensible is that the overwhelming majority in favor of this proposal—including most of us who live in Montana—are not considered an acceptable measure of what has to be a clear mandate. Despite all the ridiculous rhetoric, the acres

involved are not, will not, and cannot be converted to productive timberlands. Their absolute best value is non-motorized recreation and wildlife. (Individual, Missoula, MT - #A4209.10153)

The argument that roadless areas are a lucrative source of commercial value is groundless. Those areas provide less than 0.2% of our timber supply, and large taxpayer subsidies would be required for commercial logging in roadless areas. The real economic value of national forests comes from recreation and environmental quality of life, which the Roadless Areas Conservation Rule carefully preserves. (Individual, Ft. Meade, MD - #A4749.75500)

The national forest roadless areas were left roadless between 1950 and 1990 because the value of the timber in these areas was so low it could not be sold despite road-building and fire protection subsidies. In the 1950's and '60's Forest Service foresters created timber sales which included valuable low elevation timber at the mouths of valleys and worthless high elevation timber on the ridges. Loggers complained that to get the valuable timber they also had to buy the worthless logs. The idea was what if a logger bought such a timber sale, he would have to build roads (in the end subsidized by the government) to the ridges, so that the poor timber site could be "brought under management." Several million such acres are now "under management". But there is no money to manage these poor sites. The Siuslaw National Forest had to abandon hundreds of miles of decaying roads because they degraded water quality. There is no money to maintain these roads and there is no money to pre-commercially thin the poor quality stands the roads were built to access. The Mt. Hood N.F. had to abandon over a hundred miles of road of road in Fish Creek because it could not justify the expense of rebuilding them after repeated landslides: the timber was not valuable enough to justify repeated road rebuilding them floods in 1964, 1972 and 1993. This is a problem in national forests all over the Pacific Northwest. The 58 million roadless acres on the national forests for a reason: it has never been, nor will it ever be, economically feasible to manage them for timber. (Individual, Portland, OR - #A6269.75600)

**737. Public Concern: The Forest Service should recognize that it has already demonstrated that the commodity values of roadless areas are insignificant as compared to recreation and non-commodity values.**

In developing the Rule, the USFS also showed that the commodity values of roadless areas are not significant, and that their real economic values come from recreation and quality-of-life enhancement. (Individual, Oak Ridge, TN - #A12830.75440)

The Forest Service's own figures, supported by independent studies, clearly demonstrate that recreation and tourism contribute far more to the GDP nationally than logging, mining, and other extractive and destructive industries in our National Forests. Nationally, recreation and tourism in the National Forests provide thirty times more revenue than logging and thirty-eight times more jobs. (Organization, Bland, VA - #A17007.75440)

In addition to the substantial public responses to the Roadless Initiative, this theme has emerged from other inquiries by the Forest Service: "Most studies indicate that the majority of the American public places a higher priority on non-commodity uses than on commodity uses of public lands." Pg. 3-17, Roadless Area Conservation FEIS. (Individual, Sedona, AZ - #A17217.70500)

**738. Public Concern: The Forest Service should not consider economic factors when evaluating roadless areas.**

Economic considerations should be omitted from consideration in the roadless areas, especially since the Forest Service has identified they will lose money on roadbuilding activities in these areas. Less than 1% of the nation's wood supply would be provided by logging in these areas, and they are in hard-to-reach areas or they would have been logged already. (Individual, Olympia, WA - #A4929.75000)

All of this is so tiresome. If most Americans want to preserve our forests, why does the minority win? It's incredibly demoralizing to live in a country where the only thing that matters (that talks) is cold, hard cash. (Individual, Brooklyn, NY - #A1397.75000)

I am a Republican and believe in the merits of capitalism; but I also believe that we need to exercise some restraint. Capitalism should not be the driving force behind our decision-making. I believe that most Americans would agree that we need to reduce our dependence on foreign oil, but raping what little is left of our national forests is not the answer. We will simply be trading one crisis for another. (Individual, Peterborough, NH - #A205.75100)

What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates inventoried roadless areas? Two words: Intact ecosystems. Economics have been considered on the other 98% of the USA. You don't need to consider it here. In reality, protecting roadless areas is a good economic move, you just need to think long term. (Individual, Hampton, VA - #A16453.75900)

## ***Comparative Costs and Benefits of Ecosystem Protection and Resource Extraction***

### **739. Public Concern: The Forest Service should consider long-term costs/benefits a higher priority than short-term costs/benefits.**

The true economic cost of natural resources must take into account the degradation of the land and wildlife (which includes our stand of living). Extinction costs more than just us, it costs for all generations. Long-term cost/benefit must be made a higher priority than short-term costs/benefits. (Individual, Bozeman, MT - #A961.75900)

I am a recreational user of National Parks and wilderness lands, and I am always appreciative of the efforts of Federal agencies to make otherwise-inaccessible areas available so that I may enjoy the natural beauties of our beautiful continent. But I am also deeply appreciative of the fact that roadless areas comprise a critical part of our national assets—and that must not be compromised for short-term economic gain! Not for the pleasure of tourists like myself, nor for the profit of resource development companies. (Individual, Chestertown, MD - #A462.75000)

The Forest Service should NOT use as criteria the short-term economic gain of timber and mining interests; only LONG-term economic factors (including the future sustained yields and compatibility with surrounding areas) should even be considered. (Individual, Bozeman, MT - #A285.65000)

When considering a commercial use, Forest Service managers should carefully weigh the environmental impact (via objective, science based studies), the impact on all forms of recreational use, the availability of the natural resource targeted by the commercial use in privately owned areas, the cost incurred by the forest service to support and manage the use, the return value gained by the Forest Service as a result of the use, and the value returned to the public at large. (Individual, Saint Louis, MO - #A629.65000)

### **740. Public Concern: The Forest Service should not place economic interests above other interests.**

Ensure that economic interests are not placed above other interests in public ownership of forest land, including recreation, wildlife habitat, carbon sequestration, watershed hydrologic processes. (Individual, Lacey, WA - #A530.75000)

*Competing personal values* should have very little to do with your decision, especially when some of those values are ill-informed, as it often the case in our part of the country. Limited resources must be managed not for the satisfaction of a misguided sense of personal freedom, local autonomy, recreational preferences or “economic necessity” but for the health of the land and its complex community of life. It is time for harvestable trees and extractable hydrocarbon to take a back seat in management considerations for our precious remaining roadless areas. (Organization, Vernal, UT - #A20753.70000)

As global population grows, it will be ever more important to maintain wild untrammled places known to man and beast in their beginnings. There is a line in the sand. On one side is humankind and beast together, circumstantially foe of friend. On the other side is a world of humanity’s making, of machines and technological wonder. It is a fine line. As Hope Ryden says in *God’s Dog*, “Nature, too, must be served if she is to renew the bounty upon which all her life forms depend and to which each must also contribute. For ultimately, the green leaf has a more legitimate purpose than any technology, and each creature, linked in a chain that is also man’s lifeline, has more purpose than economic growth. (Organization, Bismarck, ND - #A19108.75530)

#### **BY MANAGING FOR THE PROTECTION OF FORESTS RATHER THAN FOR PROFIT**

The role of the Forest Service is to protect the forest, not the potential profits that could be made from any resources contained therein. (Individual, Bozeman, MT - #A284.15100)

There are those of us who do not have a private ranch with rolling hills, unspoiled forest ranges or endless prairies. We must be content to visit such places or view them from afar to remind ourselves of what our America once was and to bask in the wonder of nature. Sadly, we must . . . be content to believe that our elected officials aren’t just businessmen looking to exploit whatever is available in nature in a quest for the almighty dollar. Please be aware enough to realize that keeping whatever unspoiled areas still remain off-limits will not sink the United States economy. (Individual, Hammond, IN - #A4373.15000)

The arguments which favor continued development and exploitation of our irreplaceable public lands are fallacious and designed primarily to provide economic advancement for a few special interests, to the detriment of the populace as a whole. The American people have grown tired of seeing their prized public lands—which belong to ALL of us—exploited and destroyed for the sake of quick economic gain for a few greedy, short-sighted, sociopathic special interests. We want it stopped. Now. (Individual, Visalia, CA - #A275.15120)

It is past time for the current Executive Branch to provide leadership for us, not the few rich, special interests who would benefit from more harmful extraction from the National Forests, probably in a taxpayer subsidized way that has been so typical of many Forest Service timber sales. Be true to Teddy Roosevelt, a true conservative Republican. (Individual, Salem, WV - #A351.15120)

#### **741. Public Concern: The Forest Service should allow profitable natural resource management in roadless areas.**

What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates IRAs? The Forest Service should look into what makes money, like drilling for oil, logging or whatever would make that land actually profitable. (Individual, Silver Springs, MD - #A4593.75500)

Opponents and advocates of timber harvest need to take off their blinders to see that neither the left nor the right are the only answers, that there is a broad middle ground where logging of our National Forests can be accomplished in a manner that will result in economic benefit for those performing the harvest and a healthy forest for the flora and fauna for generations to come. (Individual, Troy, MT - #A664.75100)

**IN SUCH A WAY AS TO OFFSET ENVIRONMENTAL IMPACTS**

The Forest Service should base their decisions on the economic base of the natural resources first with management to off set environmental impacts but with the intent to allow the development of our resources. Any economy is based on the development of natural resources such as mining, timber, and agriculture. We have the strongest economy in the world and two drivers of this economy are free enterprise and the development of natural resources. Sometimes we view our present time as not needing the resources that past generations have but some things do not change. Without these bases then the economy suffers. If the Forest Service can replace this need then great “roadless” management is simple. Replacement does not count for Americans to have to leave this country to seek employment. (Individual, Elko, NV - #A4853.75000)

**742. Public Concern: The Forest Service should ensure that moneymaking projects on National Forest System lands are a by-product of managing for long-term forest sustainability and biodiversity.**

Timber harvest projects on our National Forests can help local community stability and economics. As I said before, that’s why I think the Administration wants more local control. Such moneymaking projects must be a by-product of managing for long-term forest sustainability and biodiversity. Impactive, moneymaking, timber harvest or mining projects must never be an objective unto themselves. The National Forests are in no way responsible for maintaining the economic health of local community, nor are they responsible for providing local employment opportunities. This must be made quite clear within the USFS and the communities adjacent to and inside the forests. (Individual, Grangeville, ID - #A830.75300)

**743. Public Concern: The Forest Service should manage roadless areas for long-term local economic stability rather than short term benefits.**

Washington state, as well as much of the rest of the western USA, is littered with the ruins of towns abandoned when the mines shut down or the forests were all cut down leaving nothing but a great mess and an economic desert. National Forests in general, and roadless areas in particular, should not be managed merely to create a short-term economic bonanza and long-term devastation. Many of those ruined towns would now be flourishing, prospering on the economics of recreation and of providing a desirable residence to a population increasingly untied from a particular place, had they been willing to view their resources on a long-term basis. (Individual, Seattle, WA - #A17261.70100)

Rural development should not depend solely on one industry, especially if it is not sustainable. Rural Western economies have seen such a decline because timber industries pulled out when they knew that the old growth was gone. What is going to happen after they log the remaining roadless areas? The boom and bust cycle of extractive industries has been the bane of the western economy. Local communities that are told that opening roadless areas will provide them with jobs and growth should be reminded that logging old growth or mining gold, or drilling oil never lasts forever. (Individual, Amasa, MI - #A793.75100)

A word on the false “jobs vs. the environment” dichotomy that is so often used to frame this debate: though it is true that the implementation of the full RACR passed under President Clinton would result in some disruption in one sector of the U.S. job market, the cost is well worth the benefit, especially when one considers that such a move would spur changes in forest-dependent rural economies which they would benefit from in the long run. Many Americans rely on the unstable, boom and bust timber industry for seasonal income, but forest economies which focus commerce around preserved forests provide over 30 times the jobs and income as extractive forest economies do. And, significantly jobs dependent on standing forests are stable if the forest is left standing. It only takes one cut to eliminate all those jobs overnight. (Individual, Knoxville, TN - #A8753.75310)

**INCLUDE THE TONGASS NATIONAL FOREST**

Public land should not be managed in the short-term, short-sighted interest of a handful of local interests, but in the long-term interest of the country as a whole. Specifically, no exception should be made in the rules under suspension for the Tongass rainforest area in southeast Alaska. (Individual, Seattle, WA - #A17261.70100)

**744. Public Concern: The Forest Service should consider that tourism and recreation produce more revenue than commodity use.**

I believe that the roadless areas of our National Forests deserve the strongest possible protections. This isn't just a good idea, it also make good economic sense, because timber and mining provide a small and diminishing monetary input to our local communities, while tourism and recreation provide a large and rapidly increasing element in our economy. In short, it's far more valuable for us if the trees are left standing on the mountainsides than if they are cut and used for timber. There are many other important reasons to leave our roadless areas unroaded and uncut, including protection of game, fish, and plants that many of us depend on for food. We also depend on the commercial salmon fishing industry in the Tongass, and salmon are a forest species whose spawning streams can be seriously damaged by logging. Our very large population of brown bears has become economically valuable as a major tourist attraction, and biological research is showing that our bears make very little use of fresh clearcuts, virtually no use at all of second growth forest. (Individual, Sitka, AK - #A698.75500)

Although timber production has become a dominant use of our National Forests, this was not their original intent, and the American people have made very clear their opinion that it should not be their intent today. Only 5 percent of America's timber comes from the National Forests, and less than 5 percent of that comes from areas protected by the original roadless policy. By far the most important economic value of the Tongass and other National Forests) today (85% of total revenue) is from tourism, recreation, and other uses such as hunting and fishing, and this is more than five times the revenue from logging. The roadless policy is very important for protecting the most economically valuable uses of our National Forests, while industrial activities such as logging and mining devalue and detract from all other uses. (Individual, Sitka, AK - #A698.75500)

The largest economic value of national forests is its contribution to recreational capacity and regional quality of life, which the Roadless Area Conservation Rule would enshrine for all time. Approximately 85 percent of the revenue generated from America's national forests comes from recreational activities, dwarfing the revenue yielded from logging. (Individual, Logan, UT - #A939.75000)

We operate a tour business in Southwest Alaska (have for 20 years) aboard three small passenger vessels. Recently, we committed almost \$2 million of corporate money to move our maintenance and operations departments to Sitka (building a warehouse and docking facilities at the old pulp mill site). In the process, we expect to triple the number of Alaskans we employ. As tourism has grown and timber harvesting continued in The Tongass, we have noted increasing competition for . . . a decreasing number of untouched areas. Accordingly, we disagree with this Administration's policy of revising the Roadless Area Conservation Rule as published by the previous Administration this past January. (Business, Washington, DC - #A3620.75540)

The two dozen diverse communities within the Alaska rainforest range from Juneau, the state's capital with 29,000 resident, to small remote villages of less than a hundred. Government, construction, and service industries are the largest segments of the local economy. But commercial fishing, tourism, and subsistence on fish and wildlife dominate the forest-dependent economy throughout the region, especially in the rural and Native villages. Logging and wood-processing support a few important communities. Generally, however timber plays a lesser role. The regional economy continues to grow, despite periodic declines in timber related jobs. Alaska's long-term economic gold mine is tourism, increasingly and effectively promoted on the basis of its unspoiled environment and abundant wildlife. Since statehood, Alaska's annual tourism growth has averaged 10 percent. Recent trends point to even

higher growth rates. Tourism in Southeast Alaska averaged an annual increase of over 20 percent since 1988, with a cumulative increase in revenue of 108 percent. But some tourism businesses now find themselves confronting limits to growth, caused by clearcut logging and related development. The commercial fishing and seafood processing industry accounts for approximately 20 percent of southeast Alaska's private industry employment. Commercial fishing provides large incomes, over a short summer season, to a broad spectrum of Southeast Alaskans. This income provides the critical source of capital to most rural communities, where year-round employment is scarce. The industry is dominated by salmon harvesting, which depends on high-quality stream habitat in the rainforest. (Organization, Nevada City, CA - #A4941.75100)

While the Forest Service has plenty of money budgeted for its money-losing timber program, they are underfunded when it comes to managing the forests for a growing tourism industry. Visitor impacts are increasing and the USFS is way behind the curve on assessment and planning for the number of people who are currently using the Tongass. In 2001, Southeast Alaska is expected to host over 680,000 cruise ship tourists. Local tourism businesses and visitors of all types rely on intact watersheds for recreation opportunities. When will the Forest Service in Alaska begin to manage the forests for tourism rather than logging? (Organization, Sitka, AK - #A12003.17100)

**745. Public Concern: The Forest Service should consider that local communities would benefit more from investing in new technologies than from relying on forest commodity jobs.**

Without question, the Roadless Areas could provide jobs and income for local economies, but better jobs and greater economy can come from investing in new technologies and new materials. I am absolutely convinced the reasons for considering changing the Roadless Area Conservation Rule do not outweigh those against. (Individual, Durham, NC - #A770.75100)

## Adequacy of Analysis

### Summary

**General Comments** – Both those who ask that the Roadless Area Conservation Rule not be implemented and those who ask that it be implemented question the adequacy of the economic analysis that was conducted during the rulemaking process. Some respondents assert that negative economic consequences were underestimated, while others state that net benefits were underestimated. Some people conclude that the Forest Service still fails to fairly consider or quantify non-market values and ecosystem health benefits, dismissing them as qualitative and therefore failing to incorporate them into the net public benefit valuation as required by statute. Some state that economists have now developed tools to quantify these values, which the Forest Service should adopt. Suggested benefits to be quantified include economic valuation of healthy ecosystems, including water purification, and intrinsic values.

**Economic Effects** – Some individuals specifically ask the Forest Service to quantify the effects of the Roadless Area Conservation Rule on the recreation sector. Both those who ask that the Rule be implemented and those who ask that it not be implemented state that such an analysis will vindicate their position. One organization asserts that the economic analysis failed to analyze or consider negative effects on agency employment that may result from adoption of the Rule, and requests that this analysis be completed. (See also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Regulatory Flexibility Act*.)

**The Roadless Area Conservation Rule EIS** – Several respondents specifically discuss elements of the economic analysis in the Roadless Area Conservation Rule EIS. Some request that the

Forest Service should better explain its methodology and data used in its preparation. One respondent questions the analysis of effects to the timber industry, asserting that it overstates economic effects to the timber industry by failing to account for the distorting effects of annual subsidies to this industry and by excluding any adjustments to timber receipts to account for payments to states. This individual requests that these deficiencies be corrected.

### *Adequacy of Analysis General*

#### **746. Public Concern: The Forest Service should produce competent, unbiased economic analyses.**

For years, these figures have been thrown out and never seriously refuted: 4 billion dollars from timber production from Forest Service lands; 10 times as much return to local communities from their recreation, tourism, etc. If anywhere near true, the USFS must have competent, unbiased economic analysis and utilize that as the primary guide in balancing competitive interests in the Forest Service land use. (Individual, Kalispell, MT - #A27715.15160)

#### **747. Public Concern: The Forest Service should refocus its cost benefit analysis on economic consequences when evaluating a national roadless rule.**

Economic consequences should be considered when evaluating inventoried roadless areas. Many individuals and governments have made considerable investments to better serve those individuals interested in visiting forest areas. The reasons for those investments must be considered before changes are made that could devastate family and small town/rural economies. Realistic economic data is available through local Chambers of Commerce or CVBs and through many EDCs and Economic Planning Units. (Business, Haslett, MI - #A4861.75000)

In order to achieve multiple-use, the agency must retain a reasonable balance of uses on the NFS. Therefore, we strongly oppose the FS intent to assign its first management priority as ecological sustainability. The FS has an obligation to the public to adopt management policies that take into account the social and economic needs of the nation through an unbiased approach to land and resource management planning. The FS's final rule places an inordinate focus on aesthetic and ecological values while discounting the needs of the communities who survive in the western states in part due to activities on the NFS. We urge the agency to revise its rule to one that meets the precise intent of the law. (Business, Denver, CO, - #A25688.75900)

#### **748. Public Concern: The Forest Service should conduct adequate cost benefit analyses before issuing a new rule.**

The cost-benefit analysis accompanying the prior administration's proposed rule was inadequate and incomplete. The best tool the Forest Service has to balance competing values and limited resources is through solid cost-benefit analysis. Our July 2000 comments provide examples of how the previous cost-benefit analysis was short on information necessary to support the policy of the prior proposal. (Business, Washington, DC - #A3690.75900)

We believe that a complete economic assessment be done regarding the non-consumptive uses on these lands. This should include the values for fishing, hunting, bird watching, and all recreational uses. This should be done in comparison to the value that is usually given for an area that is basically taken from the commodity extractions presented. (Business, Coarsegold, CA - #A1589.75900)

The FEIS chooses assumptions that purposely minimize the net economic impact calculated for the proposal, and yet fails to demonstrate that the proposed alternative(s) is warranted on environmental or economic grounds. (Professional Society, Anchorage, AK - #A21707.75200)

**BY ANALYZING THE COSTS AND RISKS ASSOCIATED WITH DEVELOPED ACTIVITIES IN ROADLESS AREAS**

Please analyze the ecological benefits of conservation of roadless areas. Also, analyze the costs and risks of alternatives that allow the roading of these areas and the costs and risks that prohibit roading but permit degrading activities such as logging, mining and vehicular use. This analysis of the costs and risks associated with roading, logging and otherwise will suffer and which will risk extinction. An analysis of the resultant ESA listing and their associated costs should also be discussed and quantified. (Organization, Cave Junction, OR - #A17235.14500)

**BY CONSIDERING ECONOMIC ECOSYSTEM VALUES OF NATURAL RESOURCES**

Also, remember that the economic non-use values of natural resources are consistently under estimated in cost benefit analyses preformed by the EPA and other government groups. (Individual, Ridway, PA - #A3822.70500)

**BY ACCOUNTING FOR RESOURCE DAMAGE FROM COMMODITY USES**

Do more cost-benefit analysis—one that takes into account the social, environmental and economic costs (including the costs to the USFS for “cleaning up” after cattle and logging activities). (Individual, No Address - #A410.75900)

**BY CONSIDERING THE COMMERCIAL INTERESTS OF LOCAL AREAS**

The Forest Service asks what are the characteristics, environmental values, and social and economic considerations that should be considered in determining what activities should be allowed or prohibited in roadless areas. [Footnote 6: 66 FR 35920 (July 10, 2001).] The main consideration is not to exclude any value that is important to the locality. We are pleased to see in this advance notice that the Forest Service has raised the possibilities of economic interests in roadless lands. The previous proposal did not provide for an assessment of commercial interests in an affected forest area. Without an understanding of all interests, including commercial considerations, the Forest Service is not in a position to fully appreciate the cost-benefits of its management decisions. (Business, Washington, DC - #A3690.75500)

**BY ANALYZING LIKELY TRENDS IN THE FUTURE VALUES OF RECREATIONAL AMENITIES AND NATURAL RESOURCE COMMODITIES, AND LOST OPTION VALUE INHERENT IN FURTHER DEVELOPMENT**

Obviously the Forest Service needs to think carefully through a number of implementation issues as outlined in the ten questions, reasonable application of some variant of cost-benefit analysis seems warranted. The central point, however, is that this cost-benefit analysis must take into account both likely trends in the future values of recreational amenities and natural resource commodities, and also the lost option value inherent in any further development of currently roadless areas. (Individual, Boston, MA - #A30308.11100)

**749. Public Concern: The Forest Service should consider both market and non-market values in its economic analysis.**

Market and non-market economics must be taken into consideration to provide a realistic and accurate analysis of the benefits and costs associated with our public lands. Non-market economics are difficult, to some extent, to incorporate into analyses because they are frequently economic factors that cannot have a real dollar figure attributed to them. However, non-market economics, using the most sophisticated analysis possible, is absolutely crucial and perhaps the most important element to making policy decisions (Morton, 1999). Unfortunately, land management agencies such as the Forest Service have historically ignored the non-market values of public lands, and have instead assessed only the commercial value of forest commodities like timber. (Although the Service does a very poor job of utilizing non-market analysis, the agency is required by law to take forest values beyond commodity production into consideration when doing economic analysis of management under the Multiple Use Sustained Yield Act (MUSYA, Public Law No. 86-517 Stat. 215)). (Organization, Nevada City, CA - #A4941.75800)

The characteristics, environmental values, social and economic considerations, and other factors should include both market and non-market economic to provide a realistic analysis of the cost and benefits the Forest Service as it evaluates IRAs. The Piasa Palisades are dismayed that the Forest Service has

historically ignored any non-market values of public lands, insisting on assessing the commercial value of forest commodities like timber. Roadless areas provide less than two-tenths of one percent of the nation's timber supply, any commercial logging of these areas would require large taxpayer subsidies.

We realize that non-market values are difficult to incorporate because they may not have a positive dollar amount attributed to them, but we also realize the time has come to balance the multi use land with multi use values. Further still, we ask the Forest Service to solely use sophisticated non-market economic analysis, omitting the market economics. (Organization, Alton, IL - #A13847.75800)

**750. Public Concern: The Forest Service should base its economic analysis on real data rather than inaccurate models.**

There must be a comprehensive evaluation of the social and economic impact of each alternative on surrounding communities. This should be based on real data, not models bearing little resemblance to the real communities. (Individual, Cloquet, MN - #A8272.75300)

**751. Public Concern: The Forest Service should improve socioeconomic input/output modeling in updated or amended forest plans.**

**IN COLLABORATION WITH OTHER AGENCIES**

To better understand the nature and magnitude of potential socioeconomic impacts that may be caused by the roadless rule and other related actions, we recommend related Forest plan updates or amendments include socioeconomic input/output modeling. To improve the quality of such modeling, save money, and take a major step towards more collaboration, such modeling should involve other organizations, including federal, state, and local agencies. For example, we are working with the BLM in Nevada to form a collaborative socioeconomic working group. This group will include a wide range of agencies and organizations that have an interest in the socioeconomic assessment of the management alternatives being assessed in a new resource management plan for a National Conservation Area and associated wilderness areas. The working group will help the BLM conduct the socioeconomic modeling and compile the related database, including fiscal conditions in local countries. There is a significant opportunity to coordinate the modeling approach and databases compiled for this project, and previous projects in other parts of the state, with the upcoming update of the Humboldt-Tonya Forest Plan. (State Agency, Carson City, NV - #A17669.12310)

**752. Public Concern: The Forest Service should provide information regarding maintenance costs of roaded and unroaded areas.**

Other concerns related to this issue are the lack of information regarding the costs of maintaining areas which do have roads and the costs of maintaining areas which do not have roads. (Individual, No Address - #A448.17230)

**753. Public Concern: The Forest Service should adopt a quantitative valuation formula for spiritual value in evaluating roadless areas.**

In a broad sense stewardship, economics, and ecology are and should be interrelated. The three purported to all be interested in making sure that God's household (the world) runs well for the common good of all, that is the whole of God's good (efficient!) creation. In the section "National Forest Timber Sales—Facts and Analysis," I suggest that the value of the religions or spiritual "*Oikos*" (SpV) in economic terms could be equated to the sum of the Bequest Value (BV) plus the Existence Value (EV) plus the Nonhuman Value (NHV). These economic categories capture the less material and non-material values that reflect for the religious community the awe and self worth, the beauty and importance of God's good creation. Spiritual Value is then:  $SpV=BV+EV+NHV$ . It is a real factor in how many people value the environment and needs to be carefully considered when doing a benefit-cost analysis. (Individual, San Diego, CA - #A21653.75900)

**754. Public Concern: The Forest Service should consider the positive effects of ski areas on local economies in greater depth.**

We are glad to see that, in this question, the Forest Service is giving as much emphasis to social and economic consideration in evaluating inventoried roadless areas as it is placing on environmental values and other characteristics. The Forest Service needs to recognize the high demand for recreation on public lands and the contribution that ski areas make to the economies of the local communities. To bring this about, we suggest consideration of the following information:

Annual skier days on Brundage are currently in the neighborhood of 100,000. This means that for 100,000 times each winter a visitor devotes one day of his/her time and a significant amount of disposable income to recreating on National Forest lands at the resort. This alone, without even considering the people using the summer mountain bike program, conferences and musical events, demonstrates that the public endorses the resort and provides some measure of the amount of money brought into the community of Brundage.

Also to be considered is the economic contribution the resort generates in the City of McCall and other nearby communities in the way of direct employment, payroll and spin-off patronization of other secondary businesses such as restaurants, bars, service stations, etc, i.e., the multiplier effect. (Permit Holder, McCall, ID - #A15317.75540)

**755. Public Concern: The Forest Service should incorporate the positive contribution of wilderness to nearby real estate values into its economic analysis.**

The segment of society that is moving to regions for their wilderness and quality of life values, clearly, want to see the area they are moving to protected. A direct result of this can be seen in the increasing private property value associated with a property's proximity to protected publicly owned wilderness. In an analysis of protected wilderness in the Green Mountain National Forest in Vermont and private property values in relation to the wilderness, Phillips (1999) found that towns could be expected to have an average of 13 percent more valuable private property if they were in the immediate vicinity of designated wilderness than if they were not. (Organization, Missoula, MT - #A17234.75440)

**756. Public Concern: National Forest System lands should be appraised and taxed like private lands.**

**INCLUDE NON-MARKET ECONOMIC VALUES IN APPRAISALS**

**Finding equity values for forest resources**—Commercial resources extraction has dominated the management agenda of federal forest lands. How can the Forest Service develop methodologies to equitably value all forest resources? And how can local government derive equitable compensation for forest land uses. Social scientists have been working on non-commodity for decades. While there is much work yet to be done, methodologies now in existence can significantly improve forest management.

Federal forest land should be appraised and taxed just like any other landowner. The argument that comparable market values are lacking is a weak excuse. If the methodology is good enough for private timber lands, range lands and recreation lands, why isn't it good enough for federal lands?

In most western interestingly timber lands yields little tax while recreational land and scenic land yields high taxes. I would suggest this is because recreation and scenic values are actually more important to westerners than logging. Why do we, for instance, pay professional baseball players, rock and roll musicians and movie actors high salaries and professional loggers low salaries? . . .

The US Forest Service can either learn to value non-commodity resources or perish. (Individual, Colville, WA - #A20889.75800)

### **757. Public Concern: The Forest Service should consider the economic value of healthy ecosystems.**

Critics of roadless area conservation contend protecting public lands will adversely affect economic growth. But evidence strongly shows that economic vitality and conservation of wild forests are not mutually exclusive. In fact, the economic health of rural communities that contain a large portion of federal land is actually ENHANCED by wildlands protection. For example, extractive industries no longer drive the economic engines of rural California. High tech business, tourism, recreation, and outside investments have helped diversify local economies in the Sierra Nevada, replacing the boom and bust cycles of unsustainable extractive industries. As a result, Sierra Nevada, once dependent upon activities like logging and mining, are thriving in large part because of the unique quality of life attributes public lands provide (see below for more details on shifting economics). The overwhelming contribution National Forests make to the economy is in the form of “ecosystem services”—products of the function of the Earth’s living systems society does not have to pay for but needs nonetheless. Those “services” include clean air and water, pollinators, pollution filtration, and topsoil. An economic analysis of the world’s native forests recently concluded that the ecological services of forest ecosystems worldwide was worth at least \$4.7 trillion per year (Constanza, et al. 1997). Moskowit (1999) estimates that ecological services make up 83.1 percent of the economic contribution of National Forests. (Recreation is the next highest sector, with 10.2 percent. Fish and wildlife make up 4.1 percent. Resource extraction contributes 2.7 percent.). It is also important to note such services are not merely amenities. Natural ecosystems literally sustain humans and other species, a formidable argument for the preservation of wild forests and rivers. (Organization, Nevada City, CA - #A4941.75540)

Decisions to allow logging, mining, public land grazing and motorized recreation are also decisions that degrade social values such as biodiversity, high quality wildlife habitat, clean water, and human powered recreation opportunities that are enhanced by natural ecological and quiet conditions, etc. Semi-natural forest matrix areas accessed by nearly 400,000 miles of existing roads already comprise most national forest land. In light of the fact that over 70% of USFS land is already roaded, and has in many cases already been logged, these broader, non-market social values must come first in areas that remain roadless. (Individual, Corvallis, OR - #A650.75800)

It is essential to protect what few natural settings and open space we have left in this country. In the long run, and if we internalize factors that are often not part of our cost accounting—for example, the function of roadless forests in maintaining water quality, air quality and fish habitat—economic considerations strongly favor wide roadless protection. This is especially true given that the Forest Service has acknowledged they will lose money on roadbuilding activities in these areas. Less than 1% of the nation’s wood supply would be provided by logging in these areas, and they are in hard-to-reach areas—or they would already have been logged. Road construction to support destruction of the naturalness of these lands would be at taxpayer expense and the only benefactors would be timber corporations. Very few local and sustainable jobs would be created, since the jobs would disappear on completion of the logging, as demonstrated previously. Solitude, recreation, ecosystem and watershed protection should be the priority for the roadless areas. (Individual, No Address - #A6110.75000)

The Forest Service has already adequately identified roadless area values through the public involvement process for the Roadless Area Conservation Rule. Roadless areas include the economic benefits associated with: 1) recreational opportunities and tourism, 2) commercial and recreational fisheries within the boundaries of National Forests and downstream and offshore, 3) habitat for important game species and hunting both within and outside of the National Forests, 4) water for cities, industries, businesses, and individual households downstream from National Forests, 5) the regulation of water flowing through rivers and streams, including flood control, 6) non-timber forest products such as wild mushrooms, herbs, and medicinal plants, 7) mitigation of global climate change through absorption and storage of vast amounts of carbon, 8) enhancing the quality of life of neighboring communities, 9) harboring biological resources that either have value now or have as yet unknown but potentially large economic and social value, 10) harboring biological and genetic resources that can improve the long-term productivity of all forest land, 11) pest-control services provided by species that prey on agriculture

and forest pest, and 12) pollination services provided by species that pollinate important forest and agricultural crops. The real economic value of national forests comes from recreation and environmental quality of life, which the Roadless Area Conservation Rule carefully preserves. (Individual, Santa Fe, NM - #A19211.75500)

The overwhelming contribution National Forests make to the economy is in the form of “ecosystem services:” products of the function of the Earth’s living systems society does not have to pay for but needs nonetheless. Those “services” include clean air and water, pollinators, pollution filtration, and topsoil. An economic analysis of the world’s native forests recently concluded that the ecological services of forest ecosystems worldwide was worth at least \$4.7 trillion per year (Constanza, et al. 1997). It is estimated that Forest Service recreation directly contributes \$10 billion annually to private sector outdoor gear sales, and contributes directly to the economy \$7.94 billion through recreation programs and \$3.04 billion through fishing and hunting (Moskowitz, 1999). Moskowitz (1999) estimates that ecological services make up 83.1 percent of the economic contribution of National Forests. (Recreation is the next highest sector, with 10.2 percent. Fish and wildlife make up 4.1 percent. Resource extraction contributes 2.7 percent.) It is also important to note such services are not merely amenities. Natural ecosystems literally sustain humans and other species, a formidable argument for the preservation of wild forests and rivers. (Organization, Portland, OR - #A12004.75800)

It is vital that non-traditional values of these forests be considered. Ecosystem services include flood control protection, soil and slope stability, erosion control, pest control, and maintenance of soil fertility and water infiltration. In other words, the healthy functioning of the forest and the watershed provides significant real value to communities. The value of intact ecosystems to local economies—lifestyle, real estate values, tourism, clean drinking water, fishing, and beauty—must also be considered. (Individual, Ashland, OR - #A23399.75800)

#### **INCLUDING THE ECONOMIC BENEFIT OF EXISTENCE VALUES**

Recreation is the highest sector of economic output from the National Forest System that can have a market value figure put on it, and reflects society’s appreciation of natural areas. However, there is also the economically important consideration of “passive use” or “existence value” benefits that society places on natural areas. This reflects many people’s strong emotional attachment to nature and feeling that it should be protected regardless of whether they plan to travel to a specific area and recreate in it or use it in any specific way. The simple knowledge that a species has not gone extinct or that a forest remains standing is of enormous importance to a large segment of society, whether or not they will ever encounter the species in the wild or visit a roadless area. These people are often willing to pay to keep areas protected simply for the sake of preserving nature. In its analysis of use, the Forest Service does not even include existence value as a category (USDA Forest Service, 1990). This element of economic output from the National Forest System is tremendous, but is also extremely difficult to quantify. (Organization, Missoula, MT - #A17234.75540)

According to a January 12, 1998 letter to President Clinton signed by some of the country’s leading economists, such a focus [on commodity values] is too narrow: There are non-extractive uses for which markets are either incomplete or nonexistent, but which nonetheless provide significant economic value. For example, many people enjoy recreating in pristine forest environments. Although these activities may not be purchased in market transactions, the time and other goods that people give up in order to enjoy them provide evidence of their economic value. Existing wilderness areas in our national forests and national parks meet some this recreational demand. But as these areas become increasingly congested, the recreational value increases for other roadless areas that are currently unprotected. (Whitelaw et al. 1998). (Organization, Portland, OR - #A12004.75800)

The “passive use” or “existence value” of natural areas is also economically important. This reflects many people’s strong emotional attachment to nature and feeling that it should be protected regardless of whether they plan to travel to a specific area and recreate in it or use it in any specific way. The simple knowledge that a species has not gone extinct or that a forest remains standing is of enormous

importance to large segments of society, whether or not they will ever encounter the species in the wild or visit a roadless area. These people are often willing to pay to keep areas protected simply for the sake of preserving nature. (Organization, Bozeman, MT - #A22092.75800)

The economic impact of a roadless area designation to the local communities should not be used as a limiting factor of such designation. The National Forests are for everyone, not just for some local community to sustain itself on. The Forest Service should consider existence value above the value to the local economy, how much do Americans as a whole value the existence of an intact ecosystem or wilderness. That way, you could use the appropriate metric, the sentiment of the American people, to gauge such decisions.

You should consider the impact to the environment of fragmenting an intact ecosystem with roads. This is a change that can have permanent impacts and, as yet, has not been given the appropriate significance in the Forest Service.

You should consider the fact that National Forests were intended to be America's reserve of natural resources. If we cut down all of the old-growth timber, other than the amount required by specific species, then we have none left for 80+ years (depending on how "old-growth" is defined). How is that reserving the resource for the future? It will just eventually result in another "timber industry vs. species X" scenario. We will have to disallow timber harvest because we've removed all but critically important habitat to a species listed under the Endangered Species Act. Our National Forests should have some resemblance to an actual reserve, rather than just one big shopping cart for the timber, mining, and other extractive industries. We have to actually set something aside in order to have a reserve, so let's set the roadless areas aside. (Individual, No Address - #A29243.45000)

#### **INCLUDING QUANTIFIED ECONOMIC VALUES FOR CLEAN WATER**

Frankly, I am sick of the "economic" considerations so often used to justify environmental degradation. All of the legislation that guides the FS today was initiated in response to the fact that industry will maximize profits to the detriment of all other factors. This was deemed incompatible with the American dream.

Externalities are never factored into economic equations. Can you put a price tag on clean drinking water? Until you do, environmental degradation will appear, on paper, to be economically expedient. But if you factor in the cost of purifying water for the entire Columbia Basin, logging as we know it would cease. (Individual, Lewiston, ID - #A29569.75800)

### ***Adequacy of Analysis – Economic Effects of a National Roadless Rule***

#### **758. Public Concern: The Forest Service should quantify recreation-based economic effects of a national roadless rule.**

Local decision making must take into consideration the amount of public access and recreation opportunities that are currently supported by these lands, and the effects of the future reductions caused by this decision, particularly in rural communities. Quantifiable recreation-based data from industries, rural tourism associations, and user groups that will be impacted by the reclassification of roaded and roadless areas must be analyzed in great detail prior to implementation of proposed rules for roadless area management. Again, the most practical means of accomplishing this is through the local Forest Plan Amendment process. (Elected Official, Alpine County, CA - #A8597.75540)

Demand for dispersed recreation opportunities in public wildlands is increasing, in an environment of diminishing supply (Morton, 1999). In the literature, the average value per recreation day was \$42. The literature also indicated that protecting a 10,000-acre roadless area in the West provides 3,875 visitor days per year, for an estimated annual \$162,750 in recreation value to visitors (Ibid.). Protecting 10,000 acres in the eastern portion of the country yields approximately 11,000 visitor days per year, with an annual recreation value to visitors of \$462,000. Maintaining all 42 million acres of national forest roadless areas in the conterminous United States would support 14.6 million visitor days of non-

motorized recreation, worth \$600 million in annual recreation benefits to the visitors (Ibid.). (Organization, Denver, CO - #A21367.75540)

Opponents of wildlands protection often argue that protecting public lands locks up resources, locks out people, and is bad for the economy. Facts state otherwise. The benefits of protecting roadless areas—from protecting watershed and wildlife habitat to providing much sought-after backcountry recreation opportunities—are immense and have been well documented. Although roadless wildlands are highly valued by society, without formal markets, the benefits of wildland conservation are often difficult to quantify in economic terms.

The record number of public comments received by the Forest Service in support of the roadless policy provides empirical recognition and support for the multiple uses and benefits generated from roadless area conservation. While no quantitative estimate of the benefits of the rule was provided in the Roadless EIS, the Forest Service believes the benefits of the rule outweigh the costs (USDA Forest Service 2001, Regulatory Impact Analysis). In a more sophisticated analysis, Loomis and Richardson (2000) estimated that in their current, unroaded condition, Forest Service roadless wildlands in the lower 48 states can be expected to provide almost \$600 million in recreation benefits each year, more than \$280 million in passive use values, and nearly 24,000 jobs. The authors also estimated annual benefits from roadless area ecosystem services to include between \$490 million and \$1 billion worth of carbon sequestration services as well as \$490 million in waste treatment services (Ibid, pp. iii-iv). Estimating the net impacts of the roadless rule should fully account for the benefits of conserving roadless areas as well as the potential costs with respect to the decline in quality and quantity of the other multiple uses generated by the public estate as a result of exploiting energy resources. (Organization, Denver, CO - #A21367.75800)

## **759. Public Concern: The Forest Service should analyze the impacts of a national rule on recreation-related economic activity.**

### **NEGATIVE EFFECTS OF A NATIONAL RULE ARE UNDERESTIMATED**

The DEIS is remiss in making no specific estimates for the impact on recreational uses (either good or bad). So the reviewer is really left with nothing to comment on—this is certainly a gross defect of the DEIS. The reviewer will again take a stab at estimating the impacts—not to claim it to be a true economic analysis, but rather to show that the impact on recreation, even if its a small impact, may be substantial in terms of economics. Using the Draft 1995 RPA report, it is estimated the impact of recreation on the national economy from National Forest recreation is \$98 billion. Road-based recreation accounts for the major recreational use of the National Forests.

But the DEIS claims that there will be little impact from Alternative 2, 3, or 4, because it will not close roads or trails. But the cumulative impact will certainly be noticeable because: 1) roads will no longer be built, which will reduce any growth in the recreation industry; 2) roads are being closed in otherwise roaded areas to meet other forest objectives; and 3) road definitions are changing that will allow trails to be no longer classified as trails or roads and thus be closed. How much will recreational use of the forest be reduced? If such recreational reduction is only 5%, that would amount to a \$4.9 billion economic loss. Whether or not this number is accurate is not important for this discussion, but what is important here is that the impact is so potentially large that the DEIS is very lacking in not doing a real economic analysis of that impact. (Union, No Address - #A28881.75540)

### **POSITIVE EFFECTS OF A NATIONAL RULE ARE UNDERESTIMATED**

The argument that roadless areas are essential for a healthy tourism industry is further supported by the example of . . . an original permit holder at Pack Creek bear observatory, a ship captain who has been guiding boat tours of the Tongass for the past 25 years. [He] now captains a small charter boat known as the *Discovery*, and I spent a week with him on it in July 2001. In his words, “If it was up to me this would all be protected as wilderness.” [His] comments come from his intimate connection to the Tongass, even to individual whales and brown bears, and his love of the wild nature that is so unique to Alaska. But [he] is an independent, smart and reasonable man. He understands the nature of humans in Alaska as well, and, though it is hard for him, he shares the beauty of Alaska with more and more tour

boats and tourists every year. That is why it was even more convincing when he said to me as I showed him Forest Service planning maps that put Roadless areas east across Stephens Passage from Admiralty Island on the chopping block, “People don’t want to come to Alaska and see clearcuts!” As we sat in the water just below these roadless areas with two humpback whales just yards off our bow, just off a small island hosting both a stellar sea lion rookery and harbor seals, John was blown away by what the maps clearly showed was scheduled.

There are hundreds of sustainable businesses like [this] that will absolutely suffer if big corporations maintain access to exploit the riches of these areas and take them away from the rest of the population. THE ROADLESS ANALYSIS TO DATE HAS NOT ADEQUATELY VALUED THESE BUSINESSES AND HAS UNDERESTIMATED THE IMPACTS TO THESE BUSINESSES. (Organization, Bloomington, IN - #A28110.75320)

**760. Public Concern: The Forest Service should analyze the impacts of a national rule on agency employment levels.**

The FEIS did not address impacts on Forest Service employees. We estimate that between 1,000 and 1,500 Forest Service jobs will be eliminated, with 300 of those being on the Tongass National Forest.

The DEIS has made no attempt to analyze the impact of Alternative 2, 3, or 4 on Forest Service employment levels. But if the resulting impacts cause a 5% reduction in timber and recreation use, and that is reflected in a 5% reduction in Forest Service jobs, that would be a 1,500 reduction in the number of Forest Service employees. Is that accurate?—no analysis was done. Other jobs could possibly be found, but that will not likely happen considering that the employment level of the Forest Service has fallen by 20% (about 7,000) in the last seven years, and there is no indication that any attempt will be made to retrain people (for example, to do jobs such as writing environmental impact statements). (Union, No Address - #A28881.75310)

**761. Public Concern: The Forest Service should address the impacts of a national rule on fair housing and lending provisions.**

ADA, Fair Housing, Federal non discrimination provisions, private and federal lending criteria and other areas of interest most often under Federal law, the review of States, Indian and Public Housing authority, or agencies such as HUD and USDA-RD are inadequately addressed in the proposed rule and current FS policy. Housing issues fundamental to and integral with local and state planning efforts are not fully considered in the proposed rule and existing FS policy. (Union, No Address - #A30595.70300)

**762. Public Concern: The Forest Service should assess the cost of withdrawing millions of acres from the country’s natural resource base.**

Public Concern: The Forest Service should provide the public with an assessment of the opportunity cost of withdrawing millions of acres of land from our country’s natural resource base. These lands contain valuable reserves of oil, gas, coal, timber, and many other minerals. If we are no longer permitted access to these resources, then the Forest Service should provide information detailing where they will come from, what the national security implications of outsourcing are, and what will be the likely consequences of outsourcing these materials in other parts of the world. (Organization, Maryville, TN - #A8754.65000)

*Analysis of Analysis – the Roadless Area Conservation Rule EIS*

**763. Public Concern: The Forest Service should better explain the methods and data used in the economic analysis for the Roadless Area Conservation Rule EIS.**

I am also concerned with the economics of the “roadless” proposal. You say \$565,000 would be “saved” from road maintenance costs—how was this figure computed? Did you calculate any “cost” to lost revenue from foregone resource opportunities lost???? You say the “roadless” designation could cost \$21,000,000 in (lost) timber revenue—how was this figure determined—at what stumpage rates—have

these timbered areas been adequately cruised??? What other natural resource values have been estimated (if any)—what about mineral potentials???? (Individual, Tucson, AZ - #A5625.75900)

**764. Public Concern: The Forest Service should correct the Roadless Area Conservation Rule EIS timber-related job data to account for the fact that most employment resulted from taxpayer subsidies of below cost sales.**

The Roadless Area EIS is not only misleading, but also gives the impression it seeks to foster protests from those who believe they will be cut off from the subsidized largesse they desire from the resources on these lands. The estimate of 26,610 timber related employment from the total 3,214 MMBF estimates cut doesn't match the TSPIRS jobs data. But not to worry; this claim, which projects a \$39,000 annual job income, isn't worth the paper it's printed on. (ibid @ S 32) The EIS totally ignores that 94% of the 65,557 jobs claimed for the 9 years, 61,657 jobs were subsidized because timber sales were -\$1.32 billion in the red for the 9 years, 1992-2000. (Professional Society, Saint Leonard, MD - #A9040.75710)

**765. Public Concern: The Forest Service should correct the Roadless Area Conservation Rule EIS timber program cost analysis to include payments to counties.**

The Roadless Area EIS is not only misleading, but also gives the impression it seeks to foster protests from those who believe they will be cut off from the subsidized largesse they desire from the resources on these lands. Whenever running an analysis of the timber program, such as TSPIRS, the Service always omits COUNTY PAYMENTS, CLAIMING THEY ARE IRRELEVANT. WHEN ANALYSES ARE DONE FOR A PROPOSED WILDERNESS OR A PLAN TO CURB ROAD BUILDING, REMARKABLY ESTIMATED LOSS OF COUNTY PAYMENTS APPEARS ON CENTER STAGE. (EIS @ S-32). By November 2000 when the EIS was issued by President had already signed the law disconnecting timber and other receipts from paying 25% to the counties. Old habits die hard. This "red herring" makes its typical appearance. One of the vain hopes in changing the 25% county payment law was that disconnecting county payments as a cost would make timber sale losses evaporate. Red ink is so indelibly etched into the costs of running sales that no sleight-of-hand will make losses disappear. My estimate relying on F.S. data, OMITTING COUNTY PAYMENTS, is that 86 of the 109 Forests ran - \$1.32 billion in the red for the 9 years, 1992-2000. Each job costs \$2,400. The cost per job jumped from \$1,828 in 1992 to \$3,258 in [2000], up by 1.8 times. With county payments counted the job costs rises to \$4,600 each. (Professional Society, Saint Leonard, MD - #A9040.75730)

## Economic Effects

### Summary

**General Effects on Local Communities and Economies** – General comments on this topic revolve around the consideration of the economic benefits of roadless protection to state and local economies. One organization cites a study which, it claims that contrary to popular belief, protected areas are more economically beneficial to rural communities than the relationship between natural resource dependant industries and the same communities. Respondents point specifically to the importance of protected areas to companies seeking locations which offer a high quality of life. One elected official comments that proximity to roadless areas is a very important tool in interesting companies and people in staying in and moving to their town.

**Effects on the Resource Dependent Communities and the Timber Industry** – Comments about the possible effects of a national roadless rule on the timber industry are varied. Many people assert that the Roadless Area Conservation Rule will have a significant negative impact on resource-dependent communities generally and timber-dependent areas specifically. One individual states, the federal government has almost destroyed the timber industry in Idaho. And is now worried that if more roads are closed, then it will be too expensive to remove trees,

making it impossible to stay in business. Other respondents assert that the Rule will not have a negative economic impact. They often cite the Final EIS's claim that only a small percentage of the available timber supply will be withdrawn and therefore that there will only be minor impacts to this sector. These respondents often state as well that negative economic effects have generally been exaggerated by those who ask that the Rule not be implemented, and that the timber industry itself is most to blame for the current slowdown. Over-harvest, mechanization, the global timber trade, and lack of long-term vision have all contributed to its decline, not environmental concerns, these respondents assert.

Some say that the Forest Service has failed to follow its "sustained yield" mandate, as demonstrated by declining timber removal volumes. Some state that the Agency should focus timber removal activities in roaded areas, and also help local mills to retool in order to process smaller diameter stems. Others assert that chip mills are inferior economic engines for local economies, with lower wages and benefits to communities.

Finally, some respondents urge the Forest Service to continue to utilize natural resources from roadless areas in order to meet American consumer needs. Some cite the increasing cost of homebuilding in their request that a national rule not be implemented. Others, however, say that they would rather change their buying habits and purchase more sustainable products in order to end timber removal and other resource commodity use in roadless areas. (See also Chapter 5: Activities (Question 7): Timber Removal.)

**Effects on the Agricultural and Ranching Sector** – Those who discuss the effects of a national rule on agricultural and ranching economies state that a national rule will have detrimental impacts. One respondent specifically requests a review of aquatic species protection on agriculture, since recent drought conditions have exacerbated conflicts between wildlife and rural communities. (See also Chapter 5: Activities (Question 7): Grazing.)

**Effects on the Mining, Oil, and Gas Industries** – There are several comments that directly address effects of a national roadless rule on mining, oil, and gas industries and the communities that are dependent upon them. They state that the Forest Service should not implement the Roadless Area Conservation Rule or any national policy that restricts locatable and leasable mining exploration and development in roadless areas. Some respondents discuss specific lease areas or mining operations which, they believe, are threatened by the Rule, such as coal mines in the West Elk Roadless Area, the gold mines in Jerritt Canyon on the Humboldt-Toiyabe National Forest, and oil and gas leases on national grasslands in North Dakota. These respondents request that the Rule be dropped, or that it be modified to exempt all mining activities in roadless areas. They assert that the Rule will have serious negative effects on local communities and the nation's mineral industry and supply. One respondent questions the allegation that mining results in higher road costs to the Forest Service, since they must post special bonds for road maintenance.

Some question the claim that the Rule will have any noticeable effect on the nation's supply of energy or minerals because, they say, only a relatively small percentage of the total reserves are located in roadless areas. (See also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Mining Laws General, Mining Law of 1872, and Mining and Mineral Policy Act*; and Chapter 5: Activities (Question 7): Mining, Oil, and Gas Development.)

**Effects on the Recreation Sector** – A number of respondents cite positive economic benefits to the outdoor recreation and tourism sectors as a prime reason for implementing a national roadless

rule. People assert that the Roadless Area Conservation Rule correctly places emphasis on non-commodity uses and recreational values of roadless areas, and state that the tourism industry is a viable economic base for communities near roadless areas. Some respondents ask that a national roadless rule be implemented as long as it does not exclude mountain biking from these areas. They believe their expenditures provide an increasing economic boon to areas with good opportunities for their sport.

Others assert that a national roadless rule will best protect game species habitat and superior hunting and fishing opportunities, which in turn will directly benefit local economies. Many small business owners, from professional photographers to gear shop and lodging owners to outfitter/guides, ask that roadless areas be protected in order to support their economic well-being. Some question the claim that a national rule will restrict recreation and therefore rural economic development, citing statistics that demonstrate the opposite trend.

Other respondents ask that a national rule not be implemented, and state that the economic contributions of motorized sports to local economies will be reduced. As one individual points out, there are many outdoor recreational activities, such as camping, hiking, horseback riding, fishing, hunting, bird watching and other wildlife observation that are economic contributors and all rely on the availability of good roads. Several others ask that the rule exempt ski area expansion or that the rule be abandoned entirely. Some ask that the rule not restrict horseback riders access to roadless areas due to their economic contributions to the economy as a whole. (See also Chapter 5: Activities (Question 7): Motorized Recreation, Off-Road Vehicles, Snowmobiles, Non-motorized Recreation, Mechanized Recreation, Ski Area Development, Hunting and Fishing, Outfitter-Guides, and Equestrian Use.)

**Effects on Employment** – A number of comments regarding the possible employment impacts of a national rule are closely related to comments about economic effects to communities and businesses generally. Comments are vary between those who assert that a national rule will have favorable effects on local employment due to economic diversification, and those who state that it will eliminate too many high-paying commodity-related jobs, resulting in further economic deterioration of rural communities. Some respondents assert that the Forest Service has exaggerated job losses, and that the local commodity-based economies are inherently unsustainable. Some say that export of raw logs for processing abroad has had a negative effect on domestic employment; others state that the timber industry itself is to blame for unsustainable harvest levels which have led to the current environmental concerns and lower timber harvest levels from public lands. Others say that less expensive Canadian lumber is flooding the market, and assert that lowering Forest Service stumpage rates is not the answer to this problem.

A number of people write to request that the Roadless Area Conservation Rule not be implemented, and state that their businesses and the jobs they create are at risk from this Rule. Likewise, some state that no restrictions should be placed on mining activities in roadless areas in order to preserve high-paying jobs in this industry. Some respondents question the benefits of diversifying local economies toward tourism-dependent business activity. They assert that tourism-based jobs are often seasonal, low-paying, and rarely provide health or retirement benefits to employees. These respondents cite the historical viability of their rural communities and credit the timber related jobs as the reason. They now worry that these jobs have disappeared and see citizens having to work 2-3 jobs and still not making ends meet, plus there are no benefits attached to these low paying service jobs.

A few respondents ask that, if job losses do result from a national rule, the Forest Service provide job training to displaced workers. A few suggest that these workers be employed in ecosystem restoration projects. Others assert that the Agency is not responsible for employment levels; private sector employees in non-commodity industries often face layoffs and dislocation too, thus they say, timber workers should not be given special treatment.

**Effects on Tax Receipts** – A number of respondents believe that a national rule will result in the loss of tax receipts from local businesses as well as reduced payments from the federal government that are tied to resource extraction levels. People comment in particular on possible reduced funding for local schools and public services. Some say that reduced payments to states were not adequately considered in the Roadless Area Conservation Rule Final EIS and should be better analyzed at this time. Respondents are also worried that there will be a drop in mineral royalty payments and so request that these activities be exempted.

Some urge the Forest Service to compensate local communities for losses due to a national rule. Others state that the best way to address any decrease in federal payments is to completely overhaul the financing system; such an overhaul, some suggest, could include taxes on raw materials to support affected communities. Others assert that these payments should not be made up with other federal payments because they imply welfare or attempts to buy local support for a national rule.

**Effects on the Global Economy** – Respondents who discuss global economic considerations generally assert that the United States should make use of its own natural resources to avoid dependence on foreign sources of raw materials. These sources may be threatened by political instability or supply disruptions, some state, and therefore the Roadless Area Conservation Rule should not be adopted because it would limit locally available resources. Some people also comment that a national rule would result in the transfer of environmental effects of resource removal to less environmentally conscious countries. Others say it is unwise to continue to export our own forest resources, such as Alaskan timber, to other countries and generally ask for implementation of a national roadless rule. Some urge the Forest Service to take the lead in setting an example for the rest of the world about truly sustainable forest management and rainforest conservation.

### *General Effects on Local Communities and Economies*

#### **766. Public Concern: The Forest Service should consider the economic benefits of roadless protection to state and local economies.**

Southwick Associates (2000) examined 410 counties across the western US to document the relation between county growth and employment levels and the percentage of lands in protection within 50 miles of the county center. This study demonstrated that while many argue that protecting lands from extractive activities is especially harmful to rural communities the relationship between economic growth and protected areas was stronger than the relationship between economic growth and extractive activities:

During the period 1969-1997, in western rural counties, the amount of protected lands within 50 miles of a county's center was positively and significantly correlated with employment growth and with income growth. The amount of Forest Service roadless areas within 50 miles of a county's center was positively and significantly correlated with employment growth and with income growth. Accordingly, counties containing protected lands are more likely to experience stronger economic growth than those without. Further, counties with the highest proportion of land in protected areas are growing the fastest:

Employment in non-metropolitan counties with more than 10% protected areas grew more than 1.85 times faster than the average non-metropolitan county.

Employment in non-metropolitan counties with more than 10% Forest Service roadless areas grew more than 1.43 times faster than the average non-metropolitan county.

Income in non-metropolitan counties with more than 10% protected areas grew more than 1.4 times faster than the average non-metropolitan county.

Income in non-metropolitan counties with more than 10% Forest Service roadless areas grew 1.25 times faster than the average non-metropolitan county.

The study concluded that . . . the presence of Forest Service roadless or protected areas was not correlated with slower income or employment growth in any of the county clusters. This means that the statistical test could not find any indication that roadless or protected areas have caused county economies to grow slower. Instead, there is evidence that for some county types the presence of roadless areas was correlated with income and employment growth. (Organization, Ashland, OR - #A20421.75500)

#### **DUE TO THEIR IMPORTANCE TO COMPANIES SEEKING LOCATIONS WITH HIGH QUALITY OF LIFE**

For economic concerns with respect to roadless areas, the founder of the company I work for started Bend Research in Oregon to be near public land amenities. Part of the “quality of life” drawing care we use to lure new qualified employees is recreation opportunities on public land, including roadless areas. Grant County would do better to emphasize public land recreation in their economic development, rather than trying to return to the timber industry-dominated past. (Individual, Bates, OR - #A15564.75540)

Economic statistics show that protection of public roadless lands is consistent with a thriving economy, and maintains the natural capital that forms the foundation of Colorado’s identity, quality of life, and economic well being. . . . It is high quality of life offered by Colorado that continues to attract our educated workforce, drawing new high-tech businesses to locate here. (Organization, Denver, CO - #A17162.75540)

Proximity to roadless areas is a very important tool in interesting companies and people in staying in and moving to our town. We promote our nearness to those wild resources that few other places in this great nation have been able to preserve. Our future lies in the preservation of those few wild places that are left in our region. Montana has a dismal history of short term reliance on extractive industries that abuse then abandon the resources they touch. The pro development community would have us stuck to that same tar baby again. Let’s learn from our past experience. The Good Lord isn’t making any more of those few wild acres that are left. (Mayor, City of Great Falls, MT - #A28912.75500)

Washington State is in a unique position to emerge as a respected leader in the so-called ‘green movement.’ Our state holds a large portion of the lands protected by the Roadless Area Conservation Rule, and yet our internal economy is not as highly dependent on the logging industry as are other states in a similar position. Protection of our forests can be viewed as a boon to our state as it makes us more enticing to outside investment that is looking for a corporate home that offers an educated population, high tech resources, and a high quality of living for its workforce. Mining or logging our currently protected forests would be in direct opposition to the efforts of a great many programs at work in Washington to attract new industry. (Individual, Auburn, WA - #A1347.75700)

#### **767. Public Concern: The Forest Service should protect roadless areas to prevent future financial burdens caused by flooding.**

Millions of dollars in damages can be caused by severe flooding. Roadless and unlogged watersheds could help to mitigate the severity of the floods and thus save millions of dollars and a lot of human suffering. This may be especially important if we experience climate change. (Individual, Las Vegas, NV - #A5694.51330)

Recent severe flooding in Southern Virginia during a major storm event has been linked to upstream logging on both private and public (National Forest) lands. This damage, running into the millions of dollars locally, was also responsible for loss of life and human suffering, not to mention the impacts on the wildlife populations in that stream channel. Many Appalachian communities, nestled in narrow stream bottoms, are especially susceptible to such catastrophic damage as a result of mining and logging operations and their associated roadbuilding at higher elevations. Communities wind up bearing the brunt of these actions, while corporate players reap the profits on public lands at taxpayers' expense. (Organization, Bland, VA - #A17007.75700)

**768. Public Concern: The Forest Service should consider the economic impacts of weakening protection for roadless areas in the White Mountains.**

The Roadless Area Conservation rule (as published in January 2001) already provides exceptions that allow roadbuilding when needed to address concerns of wildfires and forest health and management; so, any argument that closure is a detriment is just plainly a non-starter. Not only am I concerned that changes to the rule will significantly weaken protections for the designated areas in the White Mountains which would definitely have an impact on tourism, I am equally concerned at the unequal playing field and economic disadvantage created by such proposed re-openings. Woodsmen and loggers in my part of New Hampshire do not have the luxury of such Federal largesse or indirect subsidy and cannot benefit as those on the other end of the state who would have direct access to the areas in question. (Elected Official, State of New Hampshire - #A4951.75200)

*Effects on Resource Dependent Communities and the Timber Industry*

**769. Public Concern: The Forest Service should consider the negative economic impacts of roadless protection on the economy.**

**ON RESOURCE-DEPENDENT RURAL COMMUNITIES**

The rule does not represent a balanced approach to forest conservation. However, it does create havoc in rural communities which depend on logging, ranching, mining, and drilling. (Individual, Manchester, NH - #A1183.75300)

The entire management of the forests needs to be reviewed to ensure that decisions affecting the viability of each individual forest and the very communities dependent upon the forest for their existence are not regulated out of existence by distant agencies, generic national rules, nor by influential special interests wielding indiscriminate political power over the Agencies mandated with performing this task. (Business, Juneau, AK - #A30599.13100)

*The Forest Service must analyze potential impacts on community and provide property, and must give these national forest neighbors meaningful opportunities to comment on decisions about federal lands.* One key ingredient of communities is a healthy economic environment on which to base the livelihood of individuals living in the community. Economic development and/or the use of natural resources within the National Forest are key components of the economic viability of communities near the forest. The Forest Service must, at a minimum, seriously consider any and all economic impacts that a "roadless" designation might inflict upon nearby communities that could be affected by such a designation. (Individual, Reno, NV - #A20857.75500)

First you must consider the economic impacts on the area served. Will roadless areas destroy local economies? If they do, make some adjustments. 'My way or the highway' is not the proper tack for a government that constitutionally is pledged to preserving individual rights. Sometimes as the Supreme Court has said in numerous decisions, the rights of the few will supercede the rights of the many. I also believe you have the duty to protect small town America and it's unique way of life. The rights of the Sierra Club, Earth First, etc., should not supercede the rights of those who live in rural America. (Individual, No Address - #A834.75300)

**ANPR Question 4-Protecting Communities:** One key ingredient of communities is a healthy economic environment on which to base the livelihood of individuals living in the community. Economic development and/or the use of natural resources within the National Forest are key components of the economic viability of communities near the forest. The Forest Service must, at a minimum, seriously consider any economic impact that a "roadless" designation might inflict upon nearby communities that could be affected by such a designation. (Association, Novato, CA - #A17652.75300)

Rural economies will suffer from this action. In a county such as Lake County in Northeastern Minnesota, 58% of the land base is federal, and the timber that is grown and managed on federal lands is a very important resource. This resource is very important to the economy and social well being of Lake County. Recently, timber management by the Forest Service has not been an end in itself. For example, timber products coming off of federal lands have been the by products of aesthetic enhancement, wildlife habitat creation or fuel loading reduction management. It is important to understand the consequences of reduced timber quantities on the economy, schools, communities, local units of governments and the people of a region that is so largely dependent on the land for its way of life. When the majority of land in a region is controlled by an agency that no longer sees that resource as important as a product, there are many negative far reaching effects. (Elected Official, Lake County, MN - #A15552.75510)

#### ON TIMBER-DEPENDENT BUSINESSES

The timber harvest on the Nicolet has gone from the 96 million board feet per year the operating plan to 40 million board feet currently. This has already caused abandonment of the only railroad in Florence County-The N.B.N. Railroad. The new "Roadless Area" when coupled with all the other Forest Service set asides such as Ladd areas, wilderness, semi primitive non motorized areas, research natural areas, Wild River classifications and River-Lake corridors have heavily impacted the multiple use of our Nicolet National Forest. The Preservation goal of "No Timber Cutting on Public Lands" is rapidly approaching and with it goes the economic viability of Florence County and my company-Pine River Lumber Company, Ltd. Good management of our forest Service lands will protect these 50 jobs and still provide "all" the other multiple uses so important to National Forests Management. (Association, Long Lake, WI - #A8046.75320)

Three Rivers Timber, Inc., is a family owned, small business sawmill operation located at Kamiah, Idaho. Approximately 200 families are supported by jobs in the sawmill, woods operations, and trucking. The local national forests are the primary sources of both raw materials to run our operation, and recreational opportunities for our employees. (Association, Kamiah, ID - #A3685.75320)

**This letter is the voice of 40 people employed at Great Northern Bark Company.** It produces decorative landscaping bark which is shipped throughout the U.S., Canada, and Japan. Four thousand semi trucks of product are shipped each year which generates \$8 million of revenue. Obviously, Great Northern Bark Company is entirely dependent on nearby lumber mills who are in turn dependent on the forests. Many small lumber mills have already been forced out of business because of federal and international influence on the lumber industry. **The Roadless Areas Conservation Rule clearly threatens Montana jobs and the lumber industry further.** (Association, Columbia Falls, MT - #A26902.75300)

Central Point Lumber Company was a small log mill operating in Central Point, Oregon, until the fall of 2000. At that time, the mill which had been in continuous operation since shortly after the end of World War II, Central Point Lumber, shut down and was auctioned in the spring of this year. Central Point Lumber closed because without fee timberlands and the lack of a federal timber sale program on the national forests of southern Oregon and Northern California, it could not compete in a global market. As you are already aware, some 19 billion board feet of the 50+ billion board feet of softwood lumber consumed annually in the United States comes from Canada. Central Point Lumber Company and the 80-100 family-wage jobs it provided our local economy is gone forever. Should this economic

information be of interest to the Chief of the U.S. Forest Service? SOTIA believes the answer is yes. (Association, Medford, OR - #A17183.75400)

The federal government has almost completely destroyed the timber industry in Idaho. Don't destroy it altogether. It is much too expensive to log most areas using transportation means other than roads. Existing roads should all be maintained. Funding should be provided to do so. (Individual, Boise, ID - #A9.75200)

**770. Public Concern: The Forest Service should consider the economic benefits provided by the timber industry.**

Timber harvest is a boon to our national economy by providing good paying jobs to those who do the harvesting and to those who utilize the products to make paper and build the many types of construction. (Individual, Whitefish, MT - #A5102.75510)

**771. Public Concern: The Forest Service should act to create a more streamlined legal process to dispose of frivolous legal challenges to timber sales.**

**IN ORDER TO MAINTAIN THE VIABILITY OF SMALL MILLS**

Our state has an unbalance portion of Federal Lands, Forest Service and BLM. The poor management of these lands has decimated the smaller sawmills in the state because they were dependent upon Forest Service timber. Over the last 5 years, because the Forest Service was no longer a reliable source of timber, the smaller mills in Western Montana went out of business, leaving, for the most part, only the large timber companies who own their own timber. These companies can now dictate the price of timber from the National Forests because they don't have to buy Forest Service timber and there is no competition. The roadless initiatives, legal actions and the resulting long resolution time for disputed sales, and a Forest Service organization responding to politics not science has made the reasonable management of our National Forests a disgrace. Not only causing the loss of timber industry jobs but also allowing the build up of high fuel loads in the forests resulting in catastrophic fires in dryer years. I think this can be changed by a more streamlined legal process with recourse for frivolous legal challenges, control and management turned over to smaller local units, the State of Montana, or as I mentioned, to a quasi private organization. (Individual, Missoula, MT - #A4891.75100)

**772. Public Concern: The Forest Service should acknowledge that sustained yield has never been practiced, with prior over-harvest leading to current reductions in commercial timber volume.**

The economics of timber harvest on the western forests is questionable. It is our observation that the best timber has already been harvested on most National Forests and definitely over-harvested on the Bighorn National Forest. . . . Sustained yield was not understood or certainly not practiced and now we have a huge decrease in timber production and sawmills closed. The timber that remains will be very expensive to harvest, as it is located in the most rugged parts of the mountain. Road building will be extremely expensive for a product that can't pay the costs and at the expense of many other users including recreation, watershed quality and wildlife habitat. (Individual, Sheridan, WY - #A15725.75400)

I believe it is time to reevaluate the congressional mandate for the Forest Service to provide sustained yield of renewable resources. Past forest management has not provided sustained yield as required by the 1960 MUSYA Act, and public forests have been decimated over the past 40 years. Private logging should not occur on public lands at taxpayer expense. (Individual, Olympia, WA - #A6929.75600)

**773. Public Concern: The Forest Service should reiterate that negative economic impacts from reduced timber removal will be minimal.**

The Facts and Figures on the Economic Impact of Prohibiting Logging in the Roadless Areas of Montana's National Forests:

1. The Relative Importance of Forest Products in the Economy: Most of Montana's forest products industry is located in western and southwestern Montana. In the counties adjacent to the National Forests 3.4 percent of all jobs were directly related to forest products activity (11,000 forest products jobs out of 340,000 total jobs).
2. The Change in National Forest Timber Harvests and Local Economic Impacts: The peak year of harvest off of both federal and other lands was 1988. Since then the harvest from the National Forests has fallen by 76 percent or 473 million board feet (mmbf). During that same period the Montana counties adjacent to the National Forests added about 91,000 new jobs.
3. The Impact of Prohibiting Logging in Roadless Areas on the Local Economy: Between 1993 and 1999 the National Forest timber harvest that came from the inventoried roadless areas on the Montana NFs was 4 million board feet (mmbf). For the 2000-2004 period, the Montana NFs plan to harvest about 3 mmbf in the roadless areas. Thus, the "loss" to this part of the west central Montana economy of putting all roadless areas off limits to roading and timber harvest would be a small reduction in NF timber harvests, at most 4 mmbf or about 2 percent. If these NF counties in Montana were able to digest a 473 mmbf reduction during the 1990s without serious economic consequences, they should be able to digest a 4 mmbf reduction with ease. . . . The direct employment impact of a 4 mmbf reduction in NF timber harvest would be about 40 jobs. Each year during the 1988-1997 period about 10,000 jobs have been added in these counties. The 40 job reduction represents about 1 job out of every 8,500 jobs in the Montana NF counties. Less than two days of normal job growth would replace them. Thus, ignoring any economic benefits of protecting these areas, the economic cost of permanent protection would be a less than a one-hundredth of one percent reduction in employment or a 2-day pause in the region's ongoing economic vitality. (Organization, Missoula, MT - #A21359.75310)

The enactment of the Roadless Area Conservation Rule did have some impact in my industry in the Mid-Atlantic regions hardwood lumber markets with the closing of roadless areas in Monongahela and George Washington National Forests in West Virginia and in Virginia. The negative impact on the secondary products manufacturing segment was very short lived with domestic hardwood pricing stabilizing within 60 days. (Association, Hershey, PA - #A31493.75510)

**774. Public Concern: The Forest Service should focus timber removal in roaded areas.**

The Forest Service and our current national administration is too concerned with spending tax dollars to subsidize timber harvest in roadless areas and not concerned enough with proper management including regeneration and pre-commercial and commercial thinning in areas already roaded and committed to timber management. (Individual, Bozeman, MT - #A5649.75600)

The value of our National Forests can only be described as priceless. The worth of almost anything increases as it becomes more scarce, and we all know old growth forests are becoming rare. If we continue to allow further logging of our national forests, old growth forests and all the plants and animals that thrive in their environment will be lost. Anyone who traveled in other parts of the world has seen what happens to forests when the only criteria for protecting trees is economical. The famous Black Forest in Germany is basically nothing but a giant tree farm. The formerly forested British Isles are now hills of heather. We have plenty of commercial and BLM tree farms to support the timber industry. Leave what little remains of the old growth forests for our descendants to enjoy. The roadless ban is one small way to preserve the true value of our National Forests. (Individual, Port Angeles, WA - #A1044.70000)

**TO SUPPORT LOCAL MILLS**

There are plenty of road-accessible lands available for logging. Using the FS's own numbers, we estimate there are over 10 billion board feet of timber available for cutting within a quarter mile of the more than 4,650 miles of existing logging roads on the Tongass. That's enough to support sustainable, small-scale, locally owned, high-value timber businesses. (Individual, Auke Bay, AK - #A8021.90130)

**775. Public Concern: The Forest Service should implement a national rule to encourage private forest landowners to make more efficient use of their resources.**

Corporate interests need to better utilize the vast land assets they still retain. Humans need to make more efficient use the vast tracts they already occupy and dedicate to their exclusive use and pleasure. It is simply imperative that some significant, unbroken stretches of wild remain protected. If you try to please everyone, you will simply destroy the remaining forests. (Individual, Olympia, WA - #A16987.70500)

**776. Public Concern: The Forest Service should not implement a national roadless rule because it will further encourage overharvest of private lands.**

The reduction in Forest Service timber sales in recent years has led to a profound imbalance in Montana's log supply equation. Inventories show that Montana as a whole has not been overcut, but rather has more timber than in 1950. However, the private industrial timberlands of Montana have been very heavily logged in recent years as mills have had to compensate for the lack of National Forest timber. Their motivation is simple, to try to avoid shutting down, losing the investment in their sawmill, and throwing their employees out of work. The data gathered for an interagency task force which was summarized in the 1993 publication "An Assessment of Montana's Timber Situation" clearly show that we will need substantial amounts of National Forest timber in the near future if Montana's forest products industry is to avoid collapse. The policy of decimating the timber sale program, through a series of moratoria, listings of species such as Bull Trout under the ESA, and initiatives such as the "lock up" of 50 million acres, will in turn decimate Montana's timber dependent communities. (Organization, Missoula, MT - #A28141.75300)

**777. Public Concern: The Forest Service should help local mills retool to maximize benefits to local economies.**

The FS should work with local communities to help them utilize any forest products that are removed so that maximum economic benefit stays in the community. (Re-tooling mills to take small diameter wood, for example.) (Individual, Carlton, WA - #A30322.75400)

**778. Public Concern: The Forest Service should consider the small number of jobs created by chip mills versus those created by conventional saw mills.**

As a large number of chip mills have moved into our area because of our reputation for poor environmental protection. With their insatiable appetite for wood, projections show that they will denude the Upstate at an unsustainable rate. And all of this havoc is wreaked while a trivial number of jobs are created by a chip mill, about 1/100 of what would be created with a conventional saw mill. (Individual, Clemson, SC - #A1455.75310)

**779. Public Concern: The Forest Service should allow resource development in roadless areas to meet the needs of American consumers.**

Given the fact that your agency has de facto control over the lands which you claim, I would like you to consider the fact that our country needs the resources which are upon the public lands in order to maintain our standard of living, and to remain a light of freedom to the entire world. If we close off all of our public lands, and do not allow the resources in them to be developed, then our nation will become poor. I do not want my children and grandchildren to grow up as the children and grandchildren of people in third world countries, where the government controls everything, and the people are homeless and poor in this our land. (Individual, Las Vegas, NV - #A1078.70300)

**780. Public Concern: The Forest Service should stop claiming that the lumber needs of American consumers justify timber removal in roadless areas.**

There are no reasons or rationale adequate to continue destroying these pristine national treasures. The selling off of these forests only benefits a few timber barons. As a citizen and a taxpayer I state emphatically that you may not use my "needs" for lumber or paper pulp as an excuse to destroy these biologically rich habitats; I WILL DO WITHOUT! (Individual, Eugene, OR - #A14374.75500)

**781. Public Concern: The Forest Service should consider the negative economic impacts of roadless protection on the economy.**

**ON THE HOMEBUILDING INDUSTRY**

There is a real concern among lumber dealers and all those in the building/housing sector about how the management, or non-management, of the US forest resources impact the ability of people to purchase a home. The laws of supply and demand dictate that whenever supply is lessened, costs rise. Each time the United States shuts down access to the forests, thereby shutting down any kind of logging or selective harvesting, it impacts the cost of lumber—and it drives the US to more dependency on foreign sources of product. Lumber is the largest single component in the building of a house and when the cost of lumber increases, the cost of the house increases. For each \$2,000 increase in the cost of a home, according to the US Census Bureau, 300,000 Americans nationwide are kicked out of eligibility for a home mortgage. This is great concern for lumber dealers because if people can't afford homes, homes don't get built. When homes don't get built, lumber dealers don't have business. (Association, Washington, DC - #A6211.75400)

I have been a great supporter of yours here in Colorado and appreciate the delay of enforcing the anti-capitalist approach of the Clinton Administration on Public Lands. At one time the public lands were a Land of Many Uses. Now, they seem to be the land of socialism. The U.S. Forest Service Roadless Rule permits our public lands to decay and additional chances of wild fires of those forests and the surrounding areas. Without Roads to set up fire blocks, we are sitting on tinder here in the west so the environmentalists/socialist agenda can be promoted. By implementing the roadless rule it will increase the cost of the homes in the United States, increase the Energy Crisis and assist in bringing down our economy. (Individual, Castle Rock, CO - #A3628.10112)

*Effects on the Agricultural and Ranching Sector*

**782. Public Concern: The Forest Service should consider the social, cultural, and historic value of the sustained use of these areas and the local communities they support.**

The current Roadless Area Conservation Rule fails to account for the social, cultural, and historic value of the sustained use of these areas and the local communities which they support. As rural communities are economically besieged by impacts from a faltering economy, increasing agricultural input costs, and the loss of public resources, our country's valuable cultural heritage is slowly being eroded away. The economic and social value of these roadless areas to many industries, including ranching, cannot be understated, and should be taken into account in the decision making process. (Association, Sacramento, CA - #A3681.75000)

**783. Public Concern: The Forest Service should consider the negative economic impacts of roadless protection on the economy.**

**ON RANCHERS**

The roadless initiative also hurts my family in that it will make it harder on the ranchers who have permits to graze their cattle on the mountain. Not having any roads sure makes it hard to manage cattle. (Individual, Manti, UT - #A23591.75520)

**784. Public Concern: The Forest Service should address the effects of aquatic species protection on agricultural areas.**

This community has seen the worst drought in decades, although it is usually plentiful with water flowing off the Southeastern Cascades. The very recent Federal decision to shut down the "A" canal run-off of the upper Klamath Lake, that has been designated for the local farming community for decades, to supposedly spare the hardy Sucker fish and the unpredictable salmon at the mouth of the Klamath river has undoubtedly hurt the economy and the morale of the people here yet again. There has been an angry outcry to "kill the Sucker-fish" and to amend the Endangered Species Act, which was the "official" basis for the Federal decision, although there is a cynical suspicion that California's demand for more [electricity] played a role in this decision. There is a contingent here with whom almost all of the regional rural populous sympathizes with, that is on the verge of an all-out rebellion. (Individual, Klamath Falls, OR - #A6931.51200)

***Effects on the Mining, Oil, and Gas Industries*****785. Public Concern: The Forest Service should consider the negative economic impacts of roadless protection on the economy.****ON MINING-DEPENDENT COMMUNITIES**

The roadless rule prevents the mining and drilling of natural resources on public lands that has yet to be extracted, costing local governments millions of dollars. This would directly affect me in a number of ways. Higher taxes would be required with the loss of taxes collected on mining companies and other businesses forced to close due to the abovementioned actions. (Individual, Sterling, UT - #A8924.75700)

**786. Public Concern: The Forest Service should prepare an Energy Impact Statement for mining-dependent communities with inelastic economies.**

The Roadless Area Final Environmental Impact Statement clearly noted that in some areas of the country (particularly rural western states), that the economy is relatively or completely inelastic. This means that if historic mining jobs are eliminated, there won't be anything available to replace them, or they will be replaced by minimum wage jobs. Input is needed from local and county commissioners, agencies and public to determine the importance of coal mining to the region. Careful consideration should be given to those counties and communities where mining activities are critical to the economy and well being of those areas. An Energy Impact Statement would prove useful to this deliberation. (Business, Wright, WY - #A23085.75530)

The amended rule should include the President's Executive Order requiring that any federal action to incorporate lands into inventoried roadless designation must also include an Energy Impact Statement that identifies and quantifies impacts to energy resources within the area. (Business, Wright, WY - #A23085.65300)

**787. Public Concern: The new rulemaking process should reevaluate coal leasing restrictions in the West Elk Roadless Area.****DUE TO THE IMPORTANCE OF MINING TO THE REGIONAL ECONOMY**

There have been several Forest Management Plan revisions over the past 20 years, as well as several Environmental Impact Statements for such things as Oil and Gas Development in the Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG). In fact, the Oil and Gas FEIS Record of Decision stated, "The West Elk Roadless Area has been divided into two general areas, the area west of Coal Creek and the area east of Coal Creek. West of Coal Creek existing coal leases, coal exploration activities, and roads and spurs have compromised the roadless values. Standard Lease Terms will apply west of Coal Creek. East of Coal Creek, this part to the West Elk Roadless Area is of the Kebler Pass

Corridor. The decision of the Kebler Pass Corridor is No Lease . . . .” The coal mines are located in the area west of Coal Creek.

In addition, the area has experienced extensive drilling programs for coal exploration, as well as coal leasing. Delta County has been supportive of these coal mining activities, as it serves to extend the future of the economy of the region which supports so many of our residents. Little to none of this information was considered in the previous rulemaking, as the boundary was pre-determined. There was not an opportunity to discuss modifications in the boundaries, and as such the revised rule needs to provide that opportunity. Informed decision-making does not mean that every last bit of information be available, but pertinent and relevant data/information is critical. The Forest Service needs to ensure that the key information is brought to light. (Elected Official, Delta County, CO - #A15550.75530)

#### **DUE TO POTENTIAL IMPACTS ON THE WEST ELK MINE**

Development of the West Elk Mine historically has required several ventilation shafts and development of drilling activities requiring the construction of access roads over National Forest lands. In addition, last year, the Mine experienced a serious underground mine fire as a result of spontaneous combustion. Road construction was vital to locating the fire, determining its extent, and extinguishing it, thereby preserving vital natural resources, jobs, and associated federal coal royalties, state taxes, and revenue sharing to Gunnison County. Therefore, roadless designation of the area affecting the West Elk Mine would significantly impede future mine development and exploration by cutting off access to the surface necessary for safe and productive mining operations.

This problem is [not] merely hypothetical. Indeed, it is very real—because under the Roadless Rule, almost all of the West Elk Mine’s future expansion areas required for operations to continue would be designated as roadless since those expansion areas lie within inventoried roadless areas. Indeed, West Elk already has faced effects from the Roadless Rule. It sought permission to conduct exploration drilling in the future expansion area, but the Forest Service recently denied that request based upon the anticipated roadless designation of that area.

This denial by the Forest Service is particularly ironic since the Roadless Rule supposedly has not been implemented because of the preliminary injunction granted to plaintiffs on May 10, 2001 by the United States District Court for the District of Idaho in *Kootenai Tribe of Idaho et al v. Veneman*, Civil No. 01-010 (D. Id. filed Jan. 8, 2001), and *State of Idaho v. Dirk Kempthorne, Governor v. US Forest Service*, Civil No. 01-011 (D. Id. filed Jan. 9, 2001). Indeed, this very ANPR is an acknowledgement by the Forest Service that the rulemaking process resulting in the Roadless Rule was flawed and should be corrected. (Association, Washington, DC - #A19636.65320)

Unfortunately in the interim, however, Arch’s West Elk Mine has been caught up in the middle and is experiencing actual, not hypothetical, problems. Arch fears these problems are representative of only the tip of the iceberg should the Roadless Rule be fully implemented. Thus, as of the date of this filing, the West Elk Mine is in jeopardy due to the enjoined Roadless Rule. More specifically, even though the Roadless Rule is not in effect, the West Elk Mine has been unable to proceed with a recently approved BLM modification of two of the Mine’s coal leases, adding 160 acres to the 4836 acres in Lease C-1362 and just under 150 acres to the 2770 acres in Lease COC-56447. These lease modifications, which constitute less than a 3% increase in the size of the Mine are needed to adjust lease boundaries in order to avoid the bypass of economically recoverable coal and to provide for the efficient use of Mine resources and infrastructure without extensive expansion to new land areas. All of this has been explained and analyzed in the Forest Service’s Environmental Assessment (“EA”) related to the exploration license applications filed with BLM to cover activities in the acreage included in the lease modifications. Nevertheless, the Forest Service is proposing a stipulation to these lease modifications that will require the application of road building prohibitions.

Denial of Arch’s exploration license applications by the Forest Service based on the application of road building prohibitions will not only result in a waste of otherwise recoverable coal, but also raises real concerns that such restriction represents a portent of things to come—with adverse effects not only for Arch, but to our local communities as well. (Association, Washington, DC - #A19636.65320)

**788. Public Concern: The Forest Service should adequately consider impacts to the Utah coal industry.**

If implemented, the current proposed rule will jeopardize hundreds of millions of tons of Utah's known coal reserves and will threaten the very energy independence of the State of Utah. The U.S. Department of Agriculture and the U.S. Forest Service failed to adequately address the impact of the Roadless Area Rule on Utah's coal industry because of a complete lack of detailed maps during the public scoping process. As a result, the estimated 50 million tons of Utah coal identified by the Agency's final Environmental Impact Statement (FEIS) grossly understates the proposed rule's impact on Utah's dwindling coal reserves and the corresponding economic impact on local economies. (Association, Salt Lake City, UT - #A20464.75530)

**789. Public Concern: The Forest Service should allow access for mining to protect investments made by the industry.****IN NEVADA GOLD MINES**

AGNA is the majority owner and operator of the AngloGold-Meridian Jerritt Canyon Joint Venture that operates the Jerritt Canyon Mine on the Humboldt-Toiyabe National Forest in the Independence Range. The Independence Range lies northwest of Elko, Nevada, and southwest of the Jarbidge Wilderness.

Approximately eight miles north of the Jerritt Canyon Mine is the Big Springs mining area. Independence Mining Company Inc. (an indirect predecessor of AGNA) produced as much as 60,000 oz. of gold annually in the 1980s and early 1990s from Big Springs; AGNA has conducted some additional exploration activities in the area within the last year. Squeezed between the Jerritt Canyon Mine and Big Springs is an inventoried roadless area identified in the FEIS for the Roadless Rule, see FEIS, Vol. 2, at 117, where valuable mineral deposits quite likely exist and could be found if exploration remains feasible. The designation of this area as "roadless," however, will significantly impair any such mineral exploration and development because: (1) the preparation of new forest plans triggered by the proposed rule will cause significant delay; and (2) the likely necessity of conducting an EIS at substantial costs will make most exploration activities uneconomical. Indeed, the roadless designation itself creates a major new disincentive to making the substantial investments needed to carry out mineral exploration. (Association, Washington, DC - #A19636.75530)

**790. Public Concern: The Forest Service should consider negative economic impacts to the oil and gas industry.****IN NORTH DAKOTA**

This rule will have a devastating impact on the oil and gas industry of North Dakota and drastically impacts the economy and well being of the state as a whole. The current management direction of the grasslands allows multiple uses as determined at a local level by the Forest Service's Bismarck office. The Roadless Initiative would take nearly 25% of the Dakota Prairie Grasslands out of multiple use management and set it aside for amenity uses by small special interest groups. (Business, Bismarck, ND - #A19269.75530)

BP Amoco has put their Mandan refinery up for sale. This was announced the same week the Final EIS for the Roadless Plan was released. Why would a company do this when the lack of refinery capacity is one of the main contributors to the current oil shortage? It is my understanding that the Mandan Refinery has had difficulty in obtaining sufficient oil to operate at optimum capacity. It also obtains approximately 36% of its volume from wells located on the National Grasslands. I do not believe that if they felt assured of adequate oil supplies that they would have put the refinery up for sale. (Elected Official, McKenzie County, ND - #A27737.65300)

**791. Public Concern: The Forest Service should consider negative economic impacts to the phosphate mining industry.**

The proposed ANPR poses serious threats to our company's ability to continue providing critical phosphate soil nutrients to America's farmers. (Association, Pocatello, ID - #A20842.75530)

**792. Public Concern: The Forest Service should abandon the Roadless Area Conservation Rule.**

**DUE TO NEGATIVE ECONOMIC IMPACTS TO THE HARDROCK MINING INDUSTRY**

The USFS proposal would adversely affect NWMA members economically, spiritually, and emotionally. A significant number of our members have made substantial investments in mineral related activities occurring within the National Forest System. Their future business interests are directly and irreparable harmed by the January 12 Rule, as needed access is prevented. (Association, Spokane, WA - #A17351.75530)

**793. Public Concern: The Forest Service should consider the conclusions of the National Academy of Sciences report on hardrock mining.**

These letters refer to an October 1999 report entitled "Hardrock Mining on Federal Lands," prepared by a balanced, blue ribbon panel of experts under the auspices of the National Academy of Sciences/National Research Council, pursuant to a request by Congress (the "NRC Report"). That Report specifically found, as an overarching conclusion, that existing federal and state regulation of hardrock mining on Federal lands (including National Forest lands) was "generally effective" and that "improvements in the implementation of existing regulations present the greatest opportunity for improving environmental protection and the efficiency of the regulatory process. (Association, Washington, DC- #A19636.75530)

**794. Public Concern: The Forest Service should refute the allegation that coal mining results in higher road costs to the Agency.**

**BECAUSE INDUSTRY RECLAMATION BONDS FINANCE MAINTENANCE**

Clearly note that surface disturbances associated with coal mining (i.e., road construction and reconstruction) to the Forest Service. Federal and State rules, regulations and statutes require that the operator reclaim the disturbance to a condition at least as good as the pre-mining land condition and that it be done at the operator's expense. A reclamation bond is held by the State until such time as the reclamation is deemed satisfactory (usually 10 years after completion of the finalization of the reclamation). The Forest Service needs to refute the allegation that coal production is creating road maintenance costs for the Forest Service. (Business, Wright, WY - #A23085.75600)

The Forest Service has a unique relationship with coal mining on Forest Service lands in that there are state and federal requirements to reclaim any surface disturbance associated with mining activities to a condition that is at least as good as the pre-mining land condition. **Coal mining activities cannot by definition result in the need for the Forest Service to expand any further dollars for maintenance of roads, as it is the responsibility of the operator to reclaim those disturbed areas to the satisfaction of the landowners.** The amended rule should clearly and distinctly recognize this fact. (Business, Wright, WY - #A23085.65320)

**795. Public Concern: The Forest Service should discourage boom and bust oil and gas development.**

Depopulation in North Dakota's western counties is a longstanding circumstance. The economics of oil development in western North Dakota, only a small part of which is dependent on the National Grasslands, causes boom or bust scenarios in local communities. In 1999, on the other hand, twenty-eight percent of North Dakota's primary sector economy was attributed to our most active growth

industry—tourism. Guide services, food and sleeping accommodations, outfitters, educational and entertainment opportunities, and related retail sales and services give local citizens options for livelihoods alongside historic ranching traditions. (Organization, Bismarck, ND - #A19108.75530)

**796. Public Concern: The Forest Service should reiterate that a national roadless rule will not impact the nation's energy supplies.**

Roadless area in the Rocky Mountains are not a major domestic source of oil and gas. These areas contain only 0.04% of the nation's oil and resources and 0.06% of U.S. gas resources. Protecting roadless areas will not impact the nation's energy supplies. (Individual, Laramie, WY - #A22540.75530)

Roadless areas in the Rocky Mountains contain only four-tenths of one percent of the nation's oil resources and six-tenths of one percent of U.S. gas resources. In fact, these wild forests are worth more standing. (Organization, Portland, OR - #A12004.75500)

Most roadless areas have been available for oil and gas leasing for decades, but few have been leased. Extensive portions of the lands which the oil and gas industry believes have high potential are already under lease and therefore would not be affected by the Roadless Rule. Specifically, according to the Forest Service, 759,000 acres of national forest roadless areas with high oil and gas potential—mostly located within the Intermountain, Northern, and Rocky Mountain regions—are already under lease. The Roadless Rule would have no effect on these existing oil and gas leases and, in fact, provides for future development, with roadbuilding, on lands currently under lease. For this reason, claims of the Rule's impact are usually overestimated. (Organization, Denver, CO - #A21367.75530)

### *Effects on the Recreation Sector*

**797. Public Concern: The Forest Service should consider the economic benefits of roadless protection to state and local economies.**

**DUE TO THEIR IMPORTANCE TO THE TOURISM INDUSTRY**

Alaska's long-term economic gold mine is tourism, increasingly and effectively promoted on the basis of its unspoiled environment and abundant wildlife. Since statehood, Alaska's annual tourism growth has averaged 10 percent. Recent trends point to even higher growth rates. Tourism in Southeast Alaska averaged an annual increase of over 20 percent since 1988, with a cumulative increase in revenue of 108 percent. But some tourism businesses now find themselves confronting limits to growth, caused by clearcut logging and related development. (Organization, Plymouth, MN - #A7116.75000)

My family business has depended on roadless wilderness areas for more than 80 years. For this business to survive another generation or two we must have wilderness. We have already been impacted by logging and developments. Please, no more roads in the little that remains. (Individual, No Address - #A8149.75310)

My business employs 30 people directly related to the Boundary Waters Wilderness activity and the last thing my customers want to hear is the roar of road building and logging. Keep the Roadless Rule intact. (Business, Ely, MN - #A6610.75320)

We are grandchildren of a dude ranching family legacy. For the legacy to continue to us and our children we need to not change the Roadless Area Conservation Rule. Please keep it JUST AS IT IS. The guests that have come here for over 80 years want wilderness w/o roads. As an appointed official of our national forests you are representing us as owners of government lands. Please heed our wishes. (Individual, No Address - #A8151.75540)

We live in Bristol, VT and use the Green Mountain, Pisgah and other National Forests in the East, as well as some in the West, as owners of Wonder Walks, a permitted tour company that leads guided outings. We also hike, snowshoe, cross-country ski, and use the forest for enjoyment on our own. So, naturally, maintaining the ecological integrity of the forest is of utmost importance to us and our business. (Business, Bristol, VT - #A8734.75540)

Many of my constituents have contacted me in support of this measure. They believe it is important for both our surrounding Six Rivers Forest ecosystem and our local economy. Currently, our economy is becoming more balanced with the attributes of ecotourism, coupled with logging on other Forest Service Lands. (Elected Official, Humboldt County, CA - #A22067.75540)

It has been said many times that folks do not come to the mountains or the forests to see clear cuts, logging, or roads. The Southern Appalachian National Forests, in particular, are within one day's driving distance of half the nation's population, and are under increasing pressure from recreation and tourism. Wilderness areas in some places, particularly closer to these large urban centers, are facing overuse, while at the same time the existing roadless inventory is being whittled away by so-called "local" management into smaller and smaller parcels by roadbuilding and logging. In the end, such industries leave local communities with nothing but denuded hillsides or "beauty strips", and the departure of the loggers leave a tourism industry in shambles. (Organization, Bland, VA - #A17007.75540)

#### **DUE TO THEIR IMPORTANCE TO RECREATIONAL NON-MOTORIZED USERS**

This past summer, I spent 22 days backpacking in roadless areas out West. With the purchase of some new gear, airfare, and the use of guides, the economies of several cities benefited by having roadless areas close by. That dollar amount is multiplied many times over, and having a roadless area to attract people such as myself and others who benefit from roadless areas use, it is a continuing source of revenue for communities. (Individual, Plymouth Meeting, PA - #A8071.45100)

#### **DUE TO THEIR IMPORTANCE TO THE MOUNTAIN BIKING COMMUNITY**

Mountain biking is one of the most popular recreational uses on the TNF, by virtue of its affordability, popularity among all age groups, and accessibility to miles of trails from large Northern California population centers. The tourism associated with mountain biking on this Forest is significant to the small towns in the area, particularly Downieville, California, in the heart of the Forest, as well as the Lake Tahoe/Truckee area. Much of the social fabric of the Forest on summer weekends is strongly influenced by mountain biking activities. (Organization, Boulder, CO - #A17252.75540)

Due to popularity among all age groups, the accessibility of Tahoe NF trails from urban centers and large number of riding areas in the TNF, mountain bikers provide communities such as Downieville, Sierra City, and other smaller towns assistance from the money spent by mountain bike visitors. Larger areas such as the Truckee/Tahoe Lake area also benefit for the same reasons. Social functions within these communities celebrate mountain biking and the contributions of cyclists. (Individual, Woodland, CA - #A18071.75500)

#### **DUE TO THEIR IMPORTANCE TO RECREATIONAL FISHING AND HUNTING**

Fishing and hunting values and traditions are deeply held in the United States and must be considered in decisions that affect the roadless areas in the forests and grasslands—the nation's best remaining fish and wildlife habitat. The Forest Service should also consider the huge economic benefits roadless areas bring to state and local economies. A 1999 report by the American Sportfishing Association found that in 1996 alone, fishing in the National Forests contributed \$8.5 billion to the nation's economy. Keeping roadless areas in our national forests and grasslands roadless, will help to sustain these economic benefits. (Individual, Beverly Hills, MI - #A4756.75000)

The Forest Service should also consider the huge economic benefits roadless areas bring to state and local economies. A 1999 report by the American Sportfishing Association found that in 1996 alone, fishing in the National Forests contributed \$8.5 billion to the nation's economy. Keeping roadless areas

in our national forests and grasslands roadless will help to sustain these economic benefits. Regarding allowable activities in roadless areas, roads should not be constructed in the existing roadless areas of our national forests and grasslands. These roads threaten vital trout and salmon habitat by increasing sediment in streams - sediment that fills pools and smothers spawning gravel. (Individual, Minneapolis, MN - #A5301.75500)

Remember take away the animals and fish and we have no reason to buy a license, so you won't have any money for paying for wardens, etc. (Individual, Campbellsport, WI - #A3971.53300)

#### **DUE TO THEIR IMPORTANCE TO PHOTOGRAPHY-RELATED BUSINESSES**

Today I primarily make my living shooting wilderness landscape photographs here in Colorado. Colorado's roadless areas are the heart and soul of my business. This is not a simple-minded issue of jobs versus the environment. Preserving all of Colorado's remaining wild areas is essential for me to continue my career. (Individual, Boulder, CO - #A13461.75320)

#### **DUE TO THEIR IMPORTANCE TO OUTFITTER-GUIDES**

Inventoried roadless areas are critical to small outfitting and guide businesses permitted to operate on national forests throughout Montana. Inventoried roadless areas provide approximately half of all service days, more than designated wilderness. 235 wildlands outfitters (77% of all wildlands outfitters) depended on unprotected roadless areas for a significant portion of their business. For those wildlands outfitters, that depended on unprotected roadless areas for a portion of their business, sixty percent of their service days occurred in roadless areas. Only twenty-three percent of Montana wildlands outfitters utilized designated wilderness but no inventoried roadless areas. Thirty percent of wildlands outfitters depend on unprotected roadless areas to provide a "wild" experience. \$83 million in economic activity and 3,339 Montana jobs stem from businesses who operate in Montana's inventoried roadless areas. (Business, Bozeman, MT - #A21902.75320)

#### **DUE TO THEIR IMPORTANCE TO THE OUTDOOR GEAR INDUSTRY**

REI is a major specialty retailer of outdoor gear and clothing. Our projected sales for 2001 will exceed \$700 million, making us a significant part of the \$18 billion outdoor industry. As the nation's largest consumer cooperative we have more than 1.8 million members actively purchasing annually nationwide. . . . REI members and our 7,000 employees are passionate outdoors people and active stewards of our outdoors. Our research indicates that protection of Wilderness and pristine outdoor places for recreation is overwhelming favored by our members and employees. As a company, we've worked for more than 25 years with the outdoor industry, land managers, outdoor groups and the conservation community to ensure our members can enjoy a diversity of outdoor experiences. Forest Service lands are significant and vital to ensuring this experience.

The roadless policy is important to our business because it would have preserved 58.5 million acres of land for the 137 million Americans who last year participated in human-powered outdoor recreational activities. It also recognized that the real growth in use of public lands is in recreation. (Business, Sumner, WA - #A21731.75540)

From the muscle-powered recreation standpoint, roadless areas offer a unique and pristine outdoor experience where one can experience nature in its original state and with minimal intrusion from the outside world. These opportunities are dwindling and the REI's business is critically linked to successfully ensuring a diversity of outdoor experiences on these lands. These lands are increasingly important as urban growth continues and close-to-home recreation areas are more and more frequently surrounded by intensive development. In the long-term, these roadless areas will be in greater demand by people who want a more primitive outdoor experience. A lack of availability of such outdoor experiences will affect the future growth and success of outdoor companies such as REI, as well as manufacturers, outfitters, travel companies and the recreation-dependent communities adjacent to the resource areas. (Business, Sumner, WA - #A21731.75540)

As an employee of Tent and Trails located in New York, permanently protecting roadless areas in America's National Forests is vital to the sustainability of the \$18 billion outdoor industry that supports more than one million jobs—including mine. (Individual, New York, NY - #A27278.75540)

**798. Public Concern: The Forest Service should refute the claim that roadless area protection will harm recreation-dependent communities due to loss of visitors.**

Some opponents of the RACR claim that roadless area protection will diminish recreation opportunities on public lands, undermining the progress many rural communities have made in diversifying their economies. Potential conflict between roadless area protection and recreation has become one of the most prominent and contentious issues in the debate over public lands. Contrary to anti-roadless area propaganda, the amount of recreation on a given National Forest does not decline when a forest has a higher percentage of protected lands. When combined with the understanding that wilderness and recreation in primitive areas is an opportunity unique to the public lands system—one that cannot be replaced once it is gone—and combined with the host of other economic and community benefits wilderness provides outside the direct sector of revenue generated from recreation, further protection is clearly a prudent measure to take for our public lands. (Organization, Portland, OR - #A12004.75540)

**799. Public Concern: The Forest Service should protect big game habitat.**

**DUE TO THE CONTRIBUTION OF HUNTING TO THE LOCAL ECONOMY**

Southwest Colorado's economy receives a large boost every Fall from an influx of hunters. The thriving elk herds sought by these hunters rely on the security and solitude of national forest roadless areas during spring calving and rearing seasons. This is another important way in which the Roadless Rule will protect and enhance our local economy, by protecting the habitat that sustains our big game herds. (Individual, Durango, CO - #A11655.53100)

**800. Public Concern: The Forest Service should consider the negative economic impacts of roadless protection on the economy.**

**ON THE RECREATION-DEPENDENT TOURISM INDUSTRY**

I think recreation has a considerable economic impact and the stifling of recreation would lead to a corresponding stifling of our economy. (Individual, Palmer Lake, CO - #A23361.75540)

There is the issue of road access for recreational purposes. Outdoor recreational activities such as camping, hiking, horseback riding, fishing, hunting, bird watching and other wildlife observation are an important economic value to our area. We need good roads. (Association, Port Angeles, WA - #A17190.75540)

In past years, we have seen the impact of severe wildfires upon many communities in the United States. Burnt forests have a negative impact upon the General Public when they visit affected areas. Very little tourist activity occurs in the midst of a fire—and the resultant impact to the very area people are coming to visit may have a negative effect for several years beyond that of the fire. As many communities have become reliant upon tourism as a substitute and/or replacement for other Forest uses that provided the foundation for their communities and social structure, these same communities are extremely vulnerable to any impact on their ability to maintain jobs, and directly to provide and sustain the services and facilities required to maintain the viability of the community. I have spent time in communities that have been devastated by changing rules and laws—in many cases leaving the inhabitants with no choice other than to leave, in order to provide for their families. A healthy forest also includes its human inhabitants! (Business, Juneau, AK - #A30599.30130)

**ON SKI AREA-DEPENDENT COMMUNITIES**

The economic and social impact of a ski area closure will be detrimental for Taos and Mora counties whose already high unemployment rates are among the highest in the nation. Sipapu is the largest private employer in Southern Taos County and employs about 70 full and part-time citizens in the winter and about 25 in the summer. (Permit Holder, Vadito, NM - #A20142.75310)

Sipapu was begun by the Bolander family in 1952. Today the resort remains a small family ski area. The Roadless Initiative is a broad action, which has benefits for certain areas of public lands. However, it will be detrimental to this small family ski area and the communities surrounding it. Over the past 50 years the Bolanders have invested significant funds, including a half million-dollar state-of-the-art waste treatment plant with enough capacity for the expansion of the ski area. If the forest plan had not designated this area for ski area expansion the family would not have invested their life savings in Sipapu Ski Area. **We are asking for your help in insuring the viability and continuance of this valuable community resource in Northern New Mexico.** (Permit Holder, Vadito, NM - #A20142.75320)

**ON THE MOTORIZED RECREATION-DEPENDENT TOURISM INDUSTRY**

Some for this law say that it would boost the tourist trade. I can't see how this is possible. The truth of the matter is they come to Utah because of the easy access to our mountains. Take for example the ATV Jamboree, ground zero for this event is Richfield, Utah my home town. This single event attracts people from all over the world. I've personally met people from far away as Russia that have come to ride four-wheelers in our mountains. It is a huge event, the only other event that coming to ride and hunt there would significantly drop. Without the tourist brought in for these events the business driven by them would go under. Greatly hurting the local economy. (Individual, Richfield, UT - #A12640.75540)

**801. Public Concern: The Forest Service should exempt the proposed Pelican Butte ski area from the Roadless Area Conservation Rule.****TO HELP REVIVE THE DEPRESSED LOCAL ECONOMY**

Klamath County is in a crisis. My hope for this community, as is the hope of many of the long-time residents here, is that there could be economic diversification away from a resource-based economy (i.e. lumber) towards non-resource-based economy in order to smooth out the economy here while avoiding environmentally adverse industries. The Jeld-Wen Corporation's \$4,000,000 commitment to develop Pelican Butte, one of 51 peaks in this county, into the most environmentally conscientious ski-destination in the country was one of this community's isolated hopes of pulling it out of the economic doldrums just prior to the proposed "Roadless ban." This \$4,000,000 commitment has largely gone into the single most extensive environmental impact study in the history of skiing in this country. If the "Roadless ban" is assumed to the degree that Mr. Clinton proposed without any real local input whatsoever, then there is no hope for such a ski-development. Although the 3,000 acres that was proposed to be set aside for this project represents only 1/10,000th or 0.01% of the total Clinton "Roadless ban" area and although it would only have the capacity of 12% of the Vail ski-area before its recent expansion, this ski-destination would have a decidedly positive impact here, and hence, there has been a 70% local approval of such a project. Not only would it provide employment for the local community, but it would entice environmentally clean industries to develop branches here, thus affording the technical graduates of the Oregon Institute of Technology, 97% of whom currently leave the county for metropolitan areas, local employment. (Individual, Klamath Falls, OR - #A6931.75100)

**802. Public Concern: The Forest Service should not reduce trail access to recreational horse riders.****BECAUSE THIS USER GROUP HAS A SIGNIFICANT IMPACT ON THE U.S. ECONOMY**

Recreation use of the horse is the fastest growing segment of the horse industry and plays a major role in the United States economy. With an economic impact of more than \$28.3 billion, recreational riding supports 316,900 full-time jobs and involves more than 2.9 million individuals. Any action by the

federal government that could affect the opportunities of recreational riders to ride their horses on trails or public lands would have major influence on the viability of this very important industry. (Organization, Washington, DC - #A23320.75540)

## *Effects on Employment*

### **803. Public Concern: The Forest Service should protect roadless areas.**

#### **TO CONTRIBUTE TO THE HEALTH AND DIVERSIFICATION OF LOCAL ECONOMIES**

Critics of roadless area conservation contend protecting public lands will adversely affect economic growth. But evidence strongly shows that economic vitality and conservation of wild forests are not mutually exclusive. In fact, the economic health of rural communities that contain a large portion of federal land is actually ENHANCED by wildlands protection. For example, extractive industries no longer drive the economic engines of rural California. High tech business, tourism, recreation, and outside investments have helped diversify local economies in the Sierra Nevada, replacing the boom and bust cycles of unsustainable extractive industries. As a result, Sierra Nevada, once dependent upon activities like logging and mining, are thriving in large part because of the unique quality of life attributes public lands provide . . . (Organization, Missoula, MT - #A17234.75540)

Another problem we are facing across the nation is that unstable unsustainable economies have been developed, such as subsidized logging in the Tongass, and irrigated farming in the arid West, and these economies simply can't be maintained forever under increasing and competing resource demands. The Forest Service must work in concert with other agencies to phase out these economies. People must understand the limitations, must see the transition coming, and hopefully have some job retraining or other opportunities to help weather the transition. Honestly is an important element here.

When timber planners in the Tongass experienced falldown (the gap between timber predicted, and timber available on the ground), they deferred the problem to the future by expanding and shifting unit boundaries. This was illegal, kept the timber industry functioning at inflated levels, and caused greater hardships to rural communities, when those future timber sales had no real timber supply on the ground. You can't promise everything to everyone. Ultimately, people can recognize and respect the idea that the more people wanting a slice of the pie, the smaller the pieces have to be. The Forest Service has to be honest about the amount of resources that are available, and the limits of exploitation of those resources. (Individual, Sitka, AK - #A15506.75610)

Nor am I willing to put our forests at the mercy of politicians such as Montana Governor Judy Martz, Idaho Governor Dirk Kempthorne, or any of our Western congressional delegations and state legislature who, instead of seeking to diversify and modernize our economies, resort to anti-environmentalist demagoguery while continuing to over-emphasize the failed natural resource economy that has left my state, Montana, with the poorest performing economy in the nation. (Individual, Bozeman, MT - #A27944.12240)

#### **TO ENCOURAGE EXTRACTIVE INDUSTRIES TO REPLACE UNSUSTAINABLE BUSINESS PRACTICES WITH SUSTAINABLE ONES**

What viable business would deplete the very resources it needs for survival? The timber industry, the mining industry, the off road vehicle industry, and the petroleum industry. These industries need to find sustainable ways to create and use the products they sell. If industry cannot do this with the 380,000 miles of existing forest roads, their business is in need of some serious re-evaluation of the methods they use. If these industries cannot make this change, more sustainable industry will rise up and replace their biologically destructive products. WE need to protect all of our public lands that remain even remotely intact. The survival of the environment that sustains all life is in serious question. PROTECT ALL OF OUR NATIONS REMAINING AREAS OF ROADLESSNESS! Logging, mining, and road building interests must be held responsible for the impacts they have put on the US population's land. (Individual, Carbondale, CO - #A17312.75400)

**804. Public Concern: The Forest Service should consider the effects of timber export on employment.**

Too much of the harvested crop [logging on national forest] is shipped abroad and not used to provide additional jobs for Americans. (Individual, Williston, TN - #A1394.75310)

**805. Public Concern: The Forest Service should consider the effects of timber import from low-wage countries on domestic employment.**

Because of globalization these local mills are facing competition from cheap wood products made in low wage Asian, Mexican, South and Central American and African countries. Our local mills for that reason are not doing well. Flooding the market with more and more wood would be insane. (Individual, Klamath Falls, OR - #A2537.75950)

**806. Public Concern: The Forest Service should act to preserve local jobs by keeping roadless areas available for timber removal.**

I am writing to say open the roadless areas, and let the people that will still work for a living, have a job. I live next to the Bankhead Wilderness area, and it's a shame to even ride through it and see all the rotten and fallen trees, that someone could have used. The jobs that it would have created, and the money the schools lost out on is laying on the ground doing no one any good. (Individual, Double Springs, AL - #A120.75310)

As an employer of over 50 people I would like to express my concerns regarding the ROADLESS issues in our National Forests. The working families that we employ as a company depend totally on the forests of the United States for their livelihood. This includes the National Forests as well as private lands. Our products depend heavily on both the White Mountains National Forest in New Hampshire as well as the Monongahela National Forest in West Virginia. Any laws established to restrict the multiple use of these or any other National Forests are a direct threat to the people who's lives depend on the resource. (Association, Kingston, NH - #A21599.75300)

The USFS has been completely insensitive to the local people who use and enjoy these public lands. They have demonstrated their insensitivity in past decisions. There have been no tears shed by the environmentalists or bureaucrats for the folks who have lost their jobs and livelihoods over the past few years as a result of the decisions made by the USFS. I wonder how environmentally militant they would be if the decisions they made eliminated their own jobs. (Individual, Stayton, OR - #A1042.75310)

Satterwhite Log Homes in Gunnison, UT has a contract to log the Manti LaSal National Forest. This has a great economic impact on the community. The jobs offered by the sawmill are very beneficial. They employ 51 people along with 60 loggers who are from the surrounding areas. The lumber contributes to area farmers and ranchers allowing them to make improvements on their corrals, barns, fences, as well as other uses. The community uses the lumber for the construction of houses and fences. Lumber scraps are used for firewood. Being able to log in the Manti La Sal National Forest is very important to the Gunnison community and the surrounding areas. (Individual, Manti, UT - #A20336.75510)

**807. Public Concern: The Forest Service should act to preserve high-paying local jobs.****BY KEEPING ROADLESS AREAS ACCESSIBLE TO MINING**

It is well known that development of hardrock minerals creates new wealth, which is distributed throughout the U.S. economy and society. . . . Mining on USFS administered lands also provides the Nation's highest paid non-supervisory wage jobs. These jobs are one of the cornerstones of diversified rural economies in many parts of the West. They also are the foundation for the creation of many non-mining service and support businesses found in or near National Forests. (Mining Industry/Association, Spokane, WA - #A17351.75530)

**808. Public Concern: The Forest Service should consider that low-wage recreation-based jobs are no substitute for commodity-based high-wage ones.**

Despite inflated claims to the contrary, recreation related jobs and industries are no replacement for the resource-based economies which have been devastated by decades of the protectionism advocated by self-declared environmentalists. Although through hard work and good fortune, I was able to attend law school and establish a successful career as an attorney following the decline of the timber industry in the early 1980s, many of my contemporaries continue to suffer from the economic deprivation caused by the closure of national forests to true multiple use management. Recreational industries simply do not provide family wage employment. (Individual, Portland, OR - #A7955.75310)

The Tongass has been managed over the past five to ten years with regard for only agenda put forward by the environmental industry. This has resulted in an erosion of the lands available for development and maintenance of an economic base. The Tongass timber program was established in the 1950s to create an economic base that provided year round employment for the citizens of SE Alaska. By following the agenda of the environmental industry, SE Alaska has returned to an economy based on seasonal employment. The tourist industry provides only 3-4 months of work per season. The timber industry has been reduced to the point that there remains only about 100-150 year round jobs out of the 3,000 that existed when the land base was large enough to provide the raw material for a substantial forest products industry. The fishing industry is and always has been seasonal with a large portion of the fleet coming in for the fishing season only and therefore limiting the contribution to the economy. This therefore has reduced the wealth producing ability of the area, and leaves only the wealth draining public sector jobs. (Individual, Wrangell, AK - #A2360.75500)

Timber jobs have always made this valley thrive. The people here are now working 2 or 3 jobs still they make less money than one job in a mill. They have no benefits, or retirement. I know many people with kids that have multiple jobs and can't even pay their heat bill. (Individual, Kalispell, MT - #A17704.75310)

**809. Public Concern: The Forest Service should provide assistance in diversifying local rural economies.**

Local interest can be extremely biased when it comes to the use of these public forests. We don't like to change and oftentimes diverse local economic opportunities are hard to foster, leaving past experience as the only way. Helping our communities diversify our economies should be the main priority. (Individual, No Address - #A17946.75100)

**810. Public Concern: The Forest Service should provide career assistance.**

**RETRAIN FOREST WORKERS**

I am astonished at the number of "trophy" homes being constructed, often as second homes, in Montana, in locations that provide a favorable environment and view. These are often adjacent to national parks, forests, wilderness areas and preserves. As in the past, Montana's forest workers may need to relocate, retrain, and learn new skills. Businesses are relocating in Montana because of our stable workforce and quality of life. If anything, our forest workers need help to acquire new skills. I recall an equivalent period when thousands of displaced aerospace industry workers were retrained with federal subsidy - many becoming career Forest Service personnel. (Individual, Lolo, MT - #A111.17300)

Ex-loggers can retrain and start new lives. (Individual, Bozeman, MT - #A284.75310)

If the logging industry gets their way, all our trees will be gone. Surely, our wonderful forests are too great an asset to just sacrifice them for some temporary jobs. Let's find something else for the loggers to do. Let's give them training for new and different jobs. Let's not destroy this beautiful land of ours. (Individual, No Address - #A623.75310)

Local communities and profit-making ventures that rely on the taking of resources from public land (logging, wildlife grazing, mining, the off-road industry) must be “weaned” off their dependence on government subsidies. Other government programs, focusing on education and training must be developed to help these entities toward viable economic independence. (Individual, Portola, CA - #A695.75000)

#### **PROVIDE RESTORATION-RELATED CAREER OPPORTUNITIES TO DISPLACED TIMBER AND MINING WORKERS**

Any timber-or mining-related jobs that may be lost through these conservation measures should be replaced by jobs that will tend to SUPPORT environmental preservation and restoration. This is something we owe to all hard-working Americans, their families, and their progeny, for many generations to come. (Individual, Bradford, NH - #A5980.75300)

We believe that ecological integrity must never be sacrificed on the altar of private economic convenience. This is not to be construed as a dismissal of the problems of workers whose employment may be jeopardized by implementation of the final Rule. The ecological abuses—that were permitted from the late 1940s to the late 1980s—have resulted in forest conditions (fuel accumulations, watershed degradation, noxious weed invasions, etc.) that demand restoration activities. These activities as well as implementation of the ‘Cohesive Strategy’—can provide many opportunities for employment of those workers whose jobs are jeopardized by the roadless area protections. (Organization, Mariposa, CA - #A23321.75310)

One excellent role for local communities who may lose logging jobs is to replace these jobs with restoration, such as thinning of unnaturally crowded ponderosa pine and Sequoia forests and conducting restorative controlled burns. These activities are needed over a vast area of ponderosa pine and ponderosa pine/Douglas fir forests and could help to sustain local communities/replace logging jobs for years to come. I have traveled a large enough area of our National Forest system to know that this is a tremendous task that has the potential to provide thousands of jobs for years to come. (Individual, Davis, CA - #A30523.75310)

The good news, particularly for those protesters at that wake-like rally, is that there can be better economic times ahead for them and their families; better times doing the work they want to do—outside, in the forest, working with their hands and equipment, operating around the trees and on the old mining properties. This time of environmental consideration can mean jobs, both old and new, and a lot more of them at wages and benefits matching and likely exceeding what they are earning today—after all, these workers have a long tradition of organizing themselves into unions.

First, however, we all need to recognize that the war is over. Industry should sue for peace. An armistice must be declared, hostilities suspended and environmentalists must come to the table.

Then the old adversaries can sit together, retool our natural resource economy, save many of our small towns and the fine people who live in them.

We can do it by protecting some of the old jobs and creating many new jobs in the land. Let’s use the muscle and genius of our best loggers and loaders, mill workers and miners in restoring the land. Let’s reclaim and renew and reforest. There are thousands of jobs and profits aplenty in all rational effort of environmental conversion. (Individual, Polson, MT - #A30763.75310)

#### **PROVIDE CAREER OPPORTUNITIES TO ENVIRONMENTALISTS**

I am aware of animosity between recreational users of the White Mountain National Forest (WMNF) and the Forest Service. I believe that both should be regarded as environmental concerns and that the WMNF should provide career jobs to environmentalists. A job with the Forest Service should be regarded as highly as a job with the AMC or other environmental organizations. (Individual, Birmingham, AL - #A1111.16000)

### 811. Public Concern: The Forest Service should recognize that its management decisions are not responsible for local timber-related job losses.

The [FS] has to recognize that most of these mills are doomed for reasons much more complicated than lack of timber from the [FS]. Our western small mill economy has been nothing more than a government welfare program for years now—The Flathead is the only forest in my recent memory to have shown timber sales operated in the black. The [FS] has to drop the line that deficit sales are justified because they save 35 jobs in Darby—Wal-Mart, Costco, and Home Depot all have more to do with the eventual failure of these mills, and the people working in those mills shop in all these stores! (Individual, Missoula, MT - #A5.75310)

The National Forests are not intended to be welfare for a dying timber industry or timber-dependent communities. And yet, in many cases, these are the reasons given for harvesting timber. In a recent newspaper article, Jerry Ingersoll, the district ranger overseeing lands around Ketchikan, Alaska, said of the proposed timber sale on Gravina Island, “Recognizing that the point is not to add money to the federal treasury,” Ingersoll said, “we’re managing timber to provide jobs for the local economy. That is the purpose of this program.” But I counter that providing jobs for Ketchikan, Alaska, is not the point. The Forest Service isn’t responsible for holding together and ensuring the solvency of the local economy. I don’t want my tax dollars used to keep Ketchikan, Alaska, fiscally afloat at the expense of the forests of Gravina Island.

The decline of the local economy, loss of jobs, homeless people, etc. are all blamed on disallowing timber harvest. These could all be blamed on poor economic planning as well, perhaps more appropriately.

We don’t compensate day traders when they’ve invested poorly and go broke, but we should compensate foresters when they’ve over-logged their forests to the point that they can no longer bear the burden of another cut? This sounds merely like a poorly managed investment, and this is how it should be treated. The National Forests are for the Nation and any justification to treat local communities disparately because they have inappropriately invested in a risky business, the timber business, is an invalid use. We have enough timber to harvest in the already roaded areas. Let’s just use those and leave the rest without roads. (Individual, No Address - #A29243.75600)

Although public perception assumes that in order to have greater environmental protections, we must lose jobs, declines in employment in the timber industry are not directly linked to tougher environmental regulations. Increases in mechanization and over-cutting are the primary causes leading to mill closures and decreased employment in the field. Technological advances in the timber industry in Oregon, for example, cost about 13,800 jobs from 1980 to 1988, even as output continued to increase by almost 20%. [Oregon State Department of Employment, 1996.] *By its own nature*, industrial logging (though not necessarily selective, sustainable logging) of our national forest is an economic paradigm that is—by way of the diminishing returns principle—on the way out. The fact of this presupposes and supercedes any circumstantial contentions made by timber barons or conservationists alike, for the situation writ large is one of an industry that in this typical *modus operandi* has grossly surpassed its means—effectively putting *itself* out of business (while notably, the great potential for job opportunities in ecological restoration work remains largely unrecognized.) (Individual, Bozeman, MT - #A23574.75510)

Enough is enough! Public lands are just that! The day of the Federal Land Giveaway should now be over! As a nation, we are punch drunk on growth! It is time we sobered up! Return the land to the people, just the way it is, and let those whose incomes are bloated by Federal Land Bargains go find another way to add to their already obscene fortunes. And when you remind me about “jobs”, let me remind you that those jobs were artificially created by those who really profit from these land grabs, and those people who will “lose” jobs will find more, and find jobs more in tune with the land. No, I don’t think this is an easy decision, and that is the first indication it is the right one. (Individual, Redmond, WA - #A1249.75310)

The economic impacts of a scientifically-based roadless area policy to the timber industry and industry jobs would be negligible: “In particular, concerns recently have been expressed regarding potential job loss associated with protection of roadless areas covered under the spotted owl conservation plan (within which some timber harvesting is permitted under Option 9). The probable sale quantities of timber within these areas, however, represent only a very small share of total timber production within the region, and thus cannot be expected to have a substantial impact on industry employment or earnings, or on timber prices. [This] should be kept in mind as your administration considers the inclusion of these lands in your roadless area initiative. The employment, income, and price impacts of protecting these areas are likely to be extremely small in percentage terms” (Whitelaw et al. 1998). (Organization, Missoula, MT - #A17234.75510)

It is not true that the forest products industry is dying because it is denied access to the roadless remnant. The mill owners we know blame their economic woes on a flood of subsidized Canadian lumber imports and on high stumpage rates. We don't know what the solution to Canadian lumber imports is, but there must be one at the international level. The solution to high stumpage rates is not for Ranger districts to charge less. Nothing would be solved by stumping the last of what's left. We do not believe that our state's economy is dependent on roading and logging the last 6 million acres. If a road hasn't been punched through an area by the last of the 20th century, it is probably because there was no economic incentive to do so. The best economic draw we have is a relatively clean environment, enhanced with natural roadless areas. We can't have it both ways. (Individual, Helena, MT -#A5666.75000)

#### **AUTOMATION AND THE TIMBER INDUSTRY ARE TO BLAME**

Another excuse put forth by the timber industry is the claim that because of environmental restrictions, local economies are suffering. Nothing is further from the truth. Many logging communities have suffered not because of environmental concerns, but because they simply have used up a limited resource.

I strongly advise you to visit the Olympic Peninsula, and see what the timber industry has done to the forests there. That has been akin to an arboreal massacre, and the local communities there are suffering as well as the forests.

Timber industry jobs have disappeared not because of environmental extremism, but because of automation in the timber industry itself, not to mention greed. Where at one time cut logs were milled near the forests from which they were culled, now they are shipped overseas to take advantage of cheaper labor. That hardly strikes me as being sympathetic to the needs of local forest communities. (Individual, Seattle, WA - #A26997.75510)

#### **812. Public Concern: The Forest Service should consider that raw log exports lead to domestic job losses in manufacturing.**

I would request that you check where the timber is supposed to end up. I think you will find that most of it is exported to the orient (especially China) where it is manufactured into cheap fiberboard furniture which is then shipped back to us, thus destroying US manufacturing jobs in the furniture industry. There can just be no rational justification for this. (Individual, Belleville, IL - #A23614.75510)

#### **813. Public Concern: The Forest Service should not attempt to protect timber jobs.**

The most significant consideration should be the conservation and maintenance of wilderness/inventoried roadless areas. Jobs for the local community should not be taken into consideration. The government should not be in the business of regulating and protecting jobs. In a free market system, there are no guarantees. If I open up a store but do not adapt to the changing needs of my customers, I will go out of business. The government should not bail me out. I am sympathetic to the needs of loggers but, frankly, the writing has been on the wall for quite some time now. Those who do not adapt and develop alternative skills should not be protected. If they lose their job, it is due to poor planning on their part. (Individual, No Address - #A22265.75310)

Recognize that no one owes anyone a job just because their parents moved to a certain place to take advantage of economic opportunities that, for reasons beyond their control, are no longer there. (Individual, Pendleton, OR - #A30482.75310)

I am a displaced nuclear worker and have not empathy or sympathy for people who do not want to create new jobs for themselves. (Individual, Silverthorne, CO - #A28101.75310)

YAA does not believe that federal agencies have an obligation to assure uninterrupted employment to any group of people or to assure the financial success of any private enterprise. (Organization, Mariposa, CA - #A23321.75310)

**814. Public Concern: The Forest Service should place a higher value on roadless areas than logging and mill jobs.**

Logging and mill jobs are not worth the trade off of sacrificing the relatively small amount of unlogged and unroaded area we have in the United States. (Individual, Portland, OR - #A3676.75000)

Local involvement becomes one of many factors, and the potential future use of a local economy should not be taken into consideration—for instance, opening new roadless lands to preserve a few timber harvest jobs is not a good idea. Roadless lands should be preserved beyond our immediate needs, unless in time of national or world crisis. Loggers can move; computer dot.com executives have had to adjust to a depressed new world, and so can traditional laborers. (Individual, West Yellowstone, MT - #A1045.75000)

Recognize that economic forces will assure that there will always be alternative private sources for timber, etc, but that the public lands must be held in reserve for public purposes that are not served by such private means. (Individual, Pendleton, OR - #A30482.75310)

*Effects on Tax Receipts/Funding to Communities*

**815. Public Concern: The Forest Service should discuss impacts of a national roadless rule on Bankhead Jones payments to states and counties.**

Also impacted are the Bankhead Jones payments to the state and counties. These payments are based on the revenue generated from the National Grasslands and are used for funding our roads and schools. The Final EIS failed to address these impacts. (Elected Official, McKenzie County, ND - #A27737.75500)

**816. Public Concern: The Forest Service should continue removing timber to fund schools.**

No more road closures and open the forests to harvesting its renewable resources which help to fund our schools and educate our children. Open the forests “For The Children.” (Individual, Kalispell, MT - #A1140.75730)

**817. Public Concern: The Forest Service should work to change the rural school financing system.**

**TO REDUCE THE NEED FOR HIGH TIMBER REMOVAL LEVELS**

The best way to manage roadless areas is as follows:

Alter the school financing system so that local school districts no longer have an incentive to push for high timber cut levels. (Individual, Dallas, TX - #A18002.30200)

**818. Public Concern: The Forest Service should support a 100 percent tax on lumber to reduce demand and support affected local communities.**

I believe if we doubled the price of lumber by taxing it at 100% of its retail price that would help demand. We could then take the taxes collected and put them into communities losing jobs and thereby help them make the transition to other economic activity. In the end, if we learn to live with less lumber by treating it as more valuable we have a chance to both slow consumption as well as raise the monies necessary to help those who depend on lumber get retrained for other jobs. If the price of lumber doubles, people will use more cement and other materials (adobe, etc.) that other countries without lumber resources have proven can be adequate for a manor of housing stock, including luxury homes. It is time to take aggressive, progressive action and this is one of many aspects of what that could be. (Individual, Portland, OR - #A6838.75000)

**819. Public Concern: The Forest Service should ensure that counties understand the impacts of the Conservation and Reinvestment Act on their tax base.**

Examine the tax revenues and fees (property taxes, assessments, etc.) that are generated from private lands within the political boundaries of the federal lands within their county. Between 1993 and 1998 the Forest Service and Bureau of Land Management studied property tax revenues in counties that receive PILT. That study was aimed at attempting to understand how the combination of PILT and 25% payments (logging and other multiple-use revenue shorting) would compare to property tax payments if the federal lands were privatized and managed in a manner similar to current federal management prescriptions. The results are dramatic and have broad application to how counties should think about CARA. Examine the costs and savings of federalizing the private lands within their county. (Individual, Jefferson, OR - #A775.75720)

The effect on economic activities on the lands likely to be acquired is a most critical consideration. Given federal land management over the last several years, and the objections to economic and recreation activity in federal areas by environmental groups, it is safe to assume there would be little or no economic activity generated if private lands are federalized by CARA through land acquisition. So, if the private lands within or adjacent to the boundaries of your national forest or other public land system are acquired, which businesses and how much employment activity will be lost? For example, the entire North Woods of Maine and the Northern Forests of new York, Vermont and New Hampshire are land acquisition targets for the environmental community. These groups have set their sights on 26 million acres for new Federal parks, refuges and national forests. The North Woods is almost all-private land at this time. How many jobs will be lost in the timber and recreation communities if even a small portion these lands are turned into new federal and state designations or National Monuments? There is no simple way to get this data or perform this analysis. Each county should make their best estimate to understand the potential impacts of CARA on their tax base and the economic future of their county. (Individual, Jefferson, OR - #A775.75700)

**820. Public Concern: The Forest Service should not reduce minerals royalty payments and income to local governments by restricting access through a national roadless rule.**

State and local revenues will be reduced by wholesale restrictions of federal mineral development in roadless areas. Exploration and development of minerals requires access. The rule prohibits access. It will also eventually end federal oil and gas leases on 219,000 acres, a large portion of the North Dakota Grasslands.

State and local revenues will be impacted because roadless areas will discourage mineral development on adjacent federal, state, or private mineral holdings. Isolated tracts, or tracts of smaller size are less desirable for mineral exploration and development due to economic factors associated with those activities. The rule ignores reserved oil and gas royalty interests of western counties that contribute to local revenues. (Governor, State of North Dakota - #A22065.75530)

Several counties, which have National Grasslands within their boundaries, reserved a 6.25% royalty interest in the mineral acres that were transferred to the federal government. This royalty interest will be affected by the roadless plan because the 266,000 acres of North Dakota's National Grasslands classified as roadless will not be leased or re-leased once the existing oil and gas leases expire. This decision will have an enormous impact not only on the county revenues generated from this royalty interest but on the economy of western North Dakota that depends on the oil industry as one of its base industries. (Elected Official, McKenzie County, ND - #A27737.75530)

The intermingled nature of the National Grasslands results in development of state lands and private mineral acres being closely associated with the development of the federal mineral acres. The failure to lease and develop the federal minerals will have a negative impact on the leasing and development of the state lands and private minerals. (Elected Official, McKenzie County, ND - #A27737.75530)

Coal has been produced from the southern part of the Piceance Basin, including the northern corner of Gunnison County, since the late 1800s with more than 100 miles having operated at various times along the margin of the Basin. . . . These two mines produce 35-40% of all produced in the State of Colorado, and the North Fork Valley is considered the premier coal-mining region in the State of Colorado.

These mines are among the top taxpayers in Gunnison County (the West Elk Mine is the #1 payer and the Sanborn Creek Mine is currently #3). Without access to coal reserves, the future of these mines is foreclosed and Gunnison County will be significantly impacted. (Elected Official, Gunnison County, CO - #A22061.75530)

The mining of western federal coal generates hundreds of million of dollars in federal royalties, states taxes, federal taxes, and it provides high-paying jobs for many thousands of rural residents in the western states. (Association, Washington, DC - #A19636.75530)

Unlike the question of roads, the Forest Service has a full record and a judicially mandated obligation to respect the county royalty interests. (*McKenzie County v. Hodel*) Nevertheless, when dealing with the roadless issue, the Forest Service again ignored the contractual obligation on the part of the United States to not take any action contrary to those interests, including placing them in wilderness and unavailable for mineral leasing.

Throughout the roadless rulemaking and the final plan revision, the Forest Service again ignores interests. Indeed, the Forest Service actually represented to the public that the roadless regulation would not interfere with energy production. In response to a letter sent by the counties, the Forest Service also failed to admit that more than 250,000 acres of the Little Missouri National Grassland would be closed to new energy development. (Elected Official, McKenzie County, ND - #A27737.65300)

## **821. Public Concern: The Forest Service should exempt Utah school trust land coal resources from a national rule.**

### **BECAUSE THEY WERE INTENDED TO COMPENSATE FOR GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT RESTRICTIONS**

In light of this deliberate congressional intent to grant the State of Utah resources that could be readily accessed to quickly provide replacement school trusts funds for those lost as a result of the proclamation of the Grand Staircase-Escalante National Monument, it is not only arbitrary and capricious but also an extraordinary breach of good faith to now designate these areas within which the State of Utah holds coal resources from the 1998 Exchange as areas of "special concern" that require roadless area conservation status. Even though the State of Utah and its lessees are excepted from a prohibition on road construction in order to reach these resources, the Roadless Rule nonetheless creates an entirely new, special management designation for these areas that may include heightened environmental scrutiny, such as an automatic EIS requirement, that will lead at best to development delays. As the Roadless FEIS itself recognizes, these heightened requirements and their concomitant costs may even make the development of some resources uneconomic. See FEIS, Vol. 1 at 3-316 -3-317, 3-321.

These increased costs threaten to significantly diminish the flow of revenues to the Utah school trusts that Congress intended to protect in the 1998 Exchange. Moreover, the other beneficiaries of that exchange, coal lessees like Pacificorp, have their ability to economically develop coal lessees threatened. The Utah school trust lands gained in the 1998 Exchange were not meant by Congress to be so encumbered, and even in light of an exemption to build a road to reach the coal there, the designation of these areas thwarts the will of Congress. (Association, Washington, DC - #A19636.75530)

**822. Public Concern: The Forest Service should recognize the positive contributions of ski areas to local and federal government revenues.**

Winter sports resorts that operate on National Forest lands, contribute significantly to the local economies in other ways that add to the economic stability of the communities. The counties annually collect property taxes on the buildings and ski lifts that are located on lands within the counties. These taxes are paid on a regular basis and the counties can count on receiving these funds. Historically, property taxes paid to Adams and Valley Counties have increased on a regular basis since the resort opened in 1961. As is the case with other businesses catering to the public, the resort collects and pays sale taxes to the State of Idaho. A portion of this money is returned to the county in which it is generated.

Ski-based resorts also pay an annual use fee to the federal government based on the revenue generated each year. By law, a percentage of revenues from the sale of forest products and permitted operations are returned to the counties and used to fund public schools and roads. Unlike some of the other payments that go to the US Treasury for commercial use of forest resources (i.e., timber receipts), these taxes and fees are similar to rent for the use of the land and vary comparatively with the ski industry in that a significant amount of revenue is generated in almost perpetuity from a comparatively small tract of land. In the case of resorts like Brundage, which has been in operation for 40 years and intends to continue in business for the foreseeable future, this is an economic factor that should be considered in the roadless protection and forest planning process. (Permit Holder, McCall, ID - #A15317.75540)

**823. Public Concern: The Forest Service should recognize its responsibility to rural western communities harmed by the Roadless Area Conservation Rule.**

Governors Marc Racicot of Montana and John Kitzhaber of Oregon recently stated that they believed the federal government has a special responsibility, both moral and legal, to rural communities of the American West. They observed that the policies of the federal government for nearly 140 years encouraged development of this nation's natural resources. As a result, small towns sprang up and people put down deep roots that allowed them to weather market fluctuations and whims of nature. The one thing they thought they could depend on was continued access to the National Forests and other public lands that are the source of their livelihoods. Now, under the January 12 Rule, the federal government is poised to put an end to that possibility. (Association, Spokane, WA - #A17351.75200)

**824. Public Concern: The Forest Service should provide a fund to benefit communities impacted by roadless designations.**

Personally, I would be in favor of a fund to relocate, retrain, or otherwise benefit local communities impacted by roadless designation, but I feel that the importance to the nation outweighs the damage, if any, done to local interests. (Individual, Louisville, CO - #A30201.15100)

**825. Public Concern: The Forest Service should not make payments to counties in lieu of harvest receipts.**

Now, the federal government is making payments to counties in lieu of harvest receipts. Whatever happened to the idea of the American pioneer spirit; the spirit that so typified the westerner? Has the American lost that or has the federal government given it away as the price of appeasing a trespassing tree-sitter? Does society now "owe" us a living? How is it that, in less than a century, Oregon's Benton County went from 1-1/2% publicly owned to nearly a quarter? I see this as a very fundamental shift in our society and it disturbs me greatly. Now we want to guarantee payments to the county in lieu of timber harvest receipts. That sounds like welfare and socialism. We, the American citizen, the

stockholder in this enterprise, own the land; let's use it! Let's use our wit and intellect! This shift disturbs me greatly. (Individual, No Address - #A25635.75700)

**826. Public Concern: The Forest Service should not attempt to buy the support of affected communities with transition payments.**

The Roadless Plan indicates that the Forest Service will petition Congress for funding to provide "transition payments" to those communities that would have adverse economic impacts as a result of the Plan. We find it particularly abhorrent that the federal government would attempt to bribe affected communities with a risky and temporary payment scheme to accept a plan that is so devastating to our economy and our tax base. Are we supposed to use this money to rent U-Hauls for people leaving because they have no job and to hire plumbers to drain the water from the pipes in our schools when we have to close them? (Elected Official, McKenzie County, ND - #A27737.75200)

**827. Public Concern: The Forest Service should not develop a plan to relocate affected residents in compensation for a national roadless rule.**

We are particularly upset over a plan that advocates relocation of residents to other communities or regions of the country as a method of implementing the stipulations of the Roadless Plan. As an Agricultural State, North Dakota did not participate in the economic boom that the people on the East and West coast have experienced. To be then told that we will have to suffer additional economic damage so these people can feel good about there being "roadless" areas somewhere in North Dakota is especially disturbing to those of us who work hard in trying to build our local economies. (Elected Official, McKenzie County, ND - #A27737.75200)

*Impacts on the Global Economy*

**828. Public Concern: The Forest Service should consider the potential transfer of environmental effects of timber removal to other countries with lower standards.**

What is the long-term effect of making resources on roadless lands essentially off limits, locally and nationally? Will more pressure be placed on commodity production from other countries without effective environmental protections? (Organization, Salt Lake City, UT - #A12009.75950)

Regarding timber resource, the effect would further shift the burden and impacts of wood consumption to ecosystems contained in private forests in the U.S. or forests of other countries. The result in the last decade of federal timber harvests dropping about 79% from about 13 to 14 billion board feet annually, caused imports to rise dramatically to 36% of U.S. softwood lumber consumption. The high harvest and export of old growth boreal forests in Northern Quebec and Alberta is a public issue of concern to their citizens. The harvest of softwood timber from the private forests of the Southeastern United States currently exceeds the rate of growth. Tropical hardwood ecosystem can't continue to provide wood products at the current extraction rate. A roadless rule must consider the consequences of timber supply in the global market along with the associated "ecological transfer effects." (Organization, Lakeshore, CA - #A28962.65200)

**SUPPORT INTERNATIONAL SUSTAINABLE FORESTRY PROGRAMS**

The WRI report estimates that the world demand for industrial wood fiber will rise from current levels by 20 to 40% in the next ten years. This increased demand will likely be met on the global level but regional shortfalls are likely to occur. They contend that if the current harvesting patterns of production are not changed, that economic pressures created by the demand will result in wood fiber being obtained at an increasing level from the worlds remaining "frontier" forests. As a consequence, the tropical forests of the Amazon and equatorial Africa and the boreal forests of Siberia and Canada will continue to have more pressure for timber harvesting and management of their forest resources. What are the alternatives: Success with improved availability of wood fiber in developing countries will depend on a variety of issues and programs. Lack of land tenure rights, political instability, and lack of funds and

national programs to reinforce tree planting and tree care all contribute to loss of forest cover. Programs such as community woodlots, and agroforestry applications which provide crops and wood fiber from the same land area, continue to hold great hope for improving existing long-term supplies of wood fiber. However, global support for such programs must continue. (Individual, Fairbanks, AK - #A15.50420)

### **829. Public Concern: The Forest Service should allow timber removal in roadless areas.**

#### **TO REDUCE DEPENDENCE ON FOREIGN SOURCES**

To reduce dependence on foreign sources It takes no sense to import almost half of our softwood lumber products from Canada, and at the same time allow millions of acres of dead, dying, unhealthy or burned acres of our National Forests to not be harvested. Just because the Environmental Extremists have learned how to use the courts to further their agenda, and have been successful in using the liberal media to brainwash the masses to agree with their agenda doesn't mean it makes sense or is what's best for the country or our National Forests. Most American's live in the bigger cities and they don't have a clue, as the old adage goes "where milk comes from," or for that matter what it takes and where a 2x4 comes from. (Individual, No Address - #A676.12200)

### **830. Public Concern: The Forest Service should allow mineral development in roadless areas.**

#### **TO REDUCE DEPENDENCE ON FOREIGN SOURCES**

The establishment by administrative action on January 12, 2001, of roadless area protection for 60 million acres of non-wilderness areas has serious economic consequences to a large number of forest dependent local communities, states with significant national forest lands, and the nation as a whole. This alone justifies a serious, wholesale reconsideration of this rule. In addition, this area represents approximately **one-third** of the 192 million acres managed by the USFS. In the January 12 Rule, the Forest Service provided no evidence that a national roadless rule would improve the system under which local agency officials made decisions regarding road construction on a case-by-case basis utilizing the local forest planning process.

The USFS proposal would adversely affect NWMA members economically, spiritually, and emotionally. A significant number of our members have made substantial investments in mineral related activities occurring within the National Forest System. Their future business interests are directly and irreparable harmed by the January 12 Rule, as needed access is prevented. Also, they take great pride and comfort in the knowledge that America has viable sources of minerals vital to our national security and future prosperity. The new rule has shaken their confidence in the ability of our country to achieve sustainability. (Association, Spokane, WA - #A17351.75530)

The USGS July 2001 Report on increased U.S. reliance on imported minerals shows starkly how implementation of the Roadless Rule could well further weaken the minerals position of the nation. As a matter of sound policy and balanced implementation of its statutory authority, the Companies urge the Forest Service to carefully consider the USGS's findings. . . . Finally, in connection with locatable minerals, the Companies wish to reference the enclosed letters of this past November from members of the Armed Services Committees of the Congress and the Western Governors' Association. See Attachment 7. These letters, addressed to the Secretary of Defense, raise serious (and, as yet, unanswered) questions about the adverse impacts of the Clinton Administration's last minute regulatory binge upon the stability of the strategic and critical minerals supply in the United States. The Companies urge the Forest Service to be responsive to the questions raised by those letters as the Agency considers revision of the Roadless Rule. (Association, Washington, DC - #A19636.75530)

I feel that with the new Chief and Administration we will begin to head in a new direction, but I know it will take time. To me, just like it makes no sense to import so much of our energy needs from sometimes unreliable foreign sources (when we have untapped domestic sources). (Individual, No Address - #A676.12200)

. . . the coal reserves adversely affected by the Roadless Rule are substantial, even by the Forest Service's own flawed assessment. Thus, turning to the preamble of the Roadless Rule once more, the Forest Service stated: "Between 38 and 1,371 million tons of coal on the Grand Mesa, Uncompahgre, and Gunnison and Manti-LaSal National Forests [in Colorado and Utah] could be unavailable for development as a result of this rule." 66 Fed.Reg. 3268. Again, to provide a frame of reference, last year's *total* national coal production was approximately 1.1 billion tons of coal. As a nation, at a time when we are realizing that we need all the domestic energy that we can safely produce in an environmentally protective manner, we simply cannot afford to write off a 1.37 billion ton reserve of high quality, low sulfur clean coal. And with regard to protection of the environment, existing federal law specifically mandates that coal mining on National Forest lands must be conducted in accordance with stringent environmental standards and procedures—and, then, that same body of law requires the reclamation of coal mines when active mining is completed. (Association, Washington, DC - #A19636.20300)

#### **TO AVOID VULNERABILITY TO SUPPLY DISRUPTIONS FROM POLITICAL AND MILITARY ACTIVITY ABROAD**

The domestic mining industry provides about 50 percent of the metal used by American manufacturing companies, and the U.S. is among the world's largest producers of many important metals and minerals—particularly copper, gold, lead, molybdenum, silver and zinc.

But the U.S. Geological Survey recently reported that since 1993 (when mineral imports and exports were roughly equal), U.S. reliance on mineral imports has risen nearly sevenfold in terms of value. See Minerals Commodity Summary 2001, U.S. Geological Survey. By 2000, America had become reliant for some portion of its supply of a number of mineral commodities that it had previously exported, including aluminum, copper, lithium, magnesium metal, rare earths—and even cement. The U.S. remained more than 50 percent import reliant for at least 29 mineral commodities, including bauxite and aluminum, chromium, cobalt, iodine, manganese, nickel, platinum-group metals, potash, tantalum, tin, titanium metal, tungsten and zinc.

To avoid vulnerability to possible supply disruptions from political or military activity and unpredictable price fluctuations, the government needs to develop policies that encourage domestic mineral activity. The January 20, 2001 rule obviously would discourage mineral activity and likely further contribute to this nation's dependence on foreign supplies of certain minerals. The Forest Service must consider this country's mineral needs as it proceeds with this rulemaking. (Business or Association, Washington, DC - #A29622.65320)

#### **831. Public Concern: The Forest Service should consider the effects of its management decisions on the global economy.**

Speculating on Alaska's Forest Legacy, a land of immense forest, unsurpassed scenic splendor, and tremendous recreational opportunities, it seems easy to conclude that given the current relatively low level of harvesting and the large sustainable volumes of wood fiber that are available from both State and Federal lands, that this action will have far-ranging impacts on the management of forest plantations in other regions of the United States and in foreign countries. As the world demand for wood fiber and products continues to grow, forest management decisions in Alaska will have national implications for the cost and in some cases quality of wood products and homes both nationally and abroad. (Individual, Fairbanks, AK - #A15.75950)

#### **EXPORTING OUR NATURAL RESOURCES CONTINUES OUR DEPENDENCE ON FOREIGN SOURCES**

A great amount of lumber being taken from our forests is being sent overseas. This is what my relatives still in the business tell me. Its like the Prudhoe Bay oil . . . "too much sulphur to pay for refining it for our use," so it too goes to Japan. But we were assured that getting the oil would stop us from dependence upon the Arabs for gas. (Individual, Bismarck, ND - #A4194.75950)

**832. Public Concern: The Forest Service should provide a model for other countries on how to preserve national forests from short-term economic benefits.**

We must, as the most powerful and wealthy nation of the world and of history, take the responsibility of acknowledging that the forests of the world are in danger, and must be protected. Our protestations with respect to the brutalization of the rain forests fall on deaf ears when we use our forests for ever-increasing wealth, and expect nearly destitute people elsewhere to sacrifice short-term gain for the benefit of the planet. Let us be the models we can and should be by acknowledging our responsibilities as custodians of this precious planet. Let us put wisdom and future generations ahead of short-term greed. (Individual, Lamont, FL - #A1307.70400)

## User Fees

### Summary

A small number of respondents discuss recreational user fees. These comments are usually directed at management of National Forest System lands generally, rather than management of roadless areas specifically. Some assert that recreational users should pay their way, that these additional funds are badly needed by the Forest Service, and that this income will help broaden support for management direction that favors recreational over commodity uses. Some suggest that this fee structure be based on relative environmental impact of a particular use. Others ask that user fees, including the Fee Demonstration Project, be terminated. They believe that the fee demo program is discriminatory, violates the intent of the creation of public lands, is a double taxation, and promotes commercialization of the national forest. These respondents state that fees are unfair due to continued commercial user subsidies and disproportional impacts to low-income people.

**833. Public Concern: The Forest Service should raise funds through user fees.**

Fee-for-use can help defer costs tremendously. Build recreational areas to MAKE MONEY. (Individual, Humboldt, TN - #A464.17120)

Money is usually the issue and I would be in favor of "tolls" for wilderness access in order to assure proper enforcement of regulations in order to avoid closures. (Individual, Lake Havasu City, AZ - #A735.17120)

I also think the user fees the forest service charges are reasonable. I appreciate that you allow me to write a check and pay for my campground. (Individual, Paducah, KY - #A1693.17120)

As the population of Arizona (and other areas in the world from which tourists come) increases, the demand for uses of the roadless areas will increase.

This demand will require that the Forest Service request (or promulgate) clear policies and rules to deal with this increasing demand.

Enforcement of new policies and rules that are handed down or are promulgated by the Forest Service will usually require additional resources.

These resources can come from appropriations or sharing of resources by would-be users. The Forest Service might be well advised to ask users to pay for use at a rate that will meet the incremental management and maintenance costs. (Individual, Cottonwood, AZ - #A26396.17120)

**FROM TIMBER REMOVAL AND ROAD USAGE**

Management of FS lands in the future should be partly funded by drastically increasing the cost of lumber leases and by changing fees for road usage, as is done by many leases and by charging fees for road usage, as is done by many logging companies now to people who use their roads for recreation. (Individual, Winthrop, MA - #A19642.17100)

**834. Public Concern: The Forest Service should implement a user fee system based upon relative impact.**

**TO HELP DEFRAY THE EXPENSES OF ROAD AND TRAIL MAINTENANCE AND LAW ENFORCEMENT**

My property adjoins a portion of the Shawnee National Forest in Southern Illinois, and I have had the opportunity to observe the effects of various logging techniques and recreational vehicles over the years. From my observations, I have come to believe that the Shawnee Forest has been overdeveloped in terms of road access, and that maintenance of these roads has been sporadic and inadequate. Furthermore, a small but active group of recreational vehicle users has created significant erosion on the forest property for illegal activities (poaching, trespassing, theft, cropland damage). I therefore attended meetings last year to voice my support for designating Roadless areas, and implementing a user fee system based upon relative impact to help defray the expenses of road/trail maintenance and law enforcement on Forest Service property. (Individual, Cape Girardeau, MO - #A1674.45100)

The issue of FEES and the value of a LACK OF FEES when possible, should be addressed. When negative impacts are caused, then fees sufficient to rectify such impacts should be imposed. Otherwise, there should be no fees. (Charge what DESTROYS, not who ENJOYS!) (Individual, Bishop, CA - #A20954.17120)

**835. Public Concern: The Forest Service should not charge user fees for recreational use of national forests.**

Immediately banish the fees program as it is discriminatory, violates the intent of the creation of public lands and promotes commercialization of our natural lands. (Individual, Olympia, WA - #A20844.17120)

Additional examples of non-resident, but local increasingly restrictive forest access policy abound. One is the increased use of "fee" areas, another restrictions and paid parking at trail heads, another time limitations on camping and escalating fees in day use areas, once free. The FS feels sufficient consultation and public notice to comply with all governing regulations is made. The fact that subsequent actions ignore the public comment and notice does not seem a primary concern of the local FS. These fees have adverse and disparate impact on homeless, low income and local individuals, homeless being the least consulted group. Residents are probably the second least consulting group although not hard to find for comment. (Individual, Prescott, AZ - #A28094.17120)

**BECAUSE THEY ARE UNFAIR TO LOW-INCOME FAMILIES**

It is the public's right to enjoy all of the public lands their taxes pay for - and without extra park fees which stop poor families from exposing their children to the wonders of nature. (Individual, Phoenix, AZ - #A7809.70700)

**BECAUSE CONSUMPTIVE USERS DO NOT PAY THEIR FAIR SHARE**

The Forest Service has made a number of concessions to the logging industry. Roads have been built to facilitate the harvesting of timber, timber which is sold at a mere fraction of its value. On the other hand, recreational users like myself are expected to pay a user fee just to hike or engage in other non-destructive activities in our national forest. This is extremely unfair. (Individual, Philadelphia, PA - #A1623.75600)

**836. Public Concern: The Forest Service should end the fee demonstration project.**

Please end the Fee Demonstration Project now. With all of the money you are receiving from timber and mining interests, there should be no excuse for your mismanagement of funds. (Individual, Seattle, WA - #A7758.17120)

I hope that you will oppose all efforts to impose "Recreation Fees" by supporting permanent implementation of the Fee Demo program. If this program is allowed to continue, our forests will be developed for revenue intense recreation at the expense of simple activities such as hiking, study, education, or solitude. The Fee Demo program, written and supported by the ARC (American Recreation Coalition), is an attempt to undermine public will by imposing fees that demonstrate popular support for industrial recreation. Our forests should remain wild and free if this country is to remain so. Please support an end to this insidious program. (Individual, Boise, ID - #A12034.17120)

The real economic value of national forests comes from recreation and environmental quality of life, which the Roadless Area Conservation Rule carefully preserves. Approximately 85 percent of the revenue generated from America's national forests comes from recreational activities, more than five times the amount generated by logging. This fact, however does not justify or condone the imposition of an unfair user fee: the Fee Demo Program. (Individual, Las Vegas, NV - #A5989.75400)

**837. Public Concern: The Forest Service should consider the economic impacts of user fees.**

If fees are proposed or imposed, any impacts on the poor relative to the rich should be addressed. The poor often visit or even choose to live near roadless and wilderness areas because, unlike the rich, who can take a cruise, or vacation in Tahiti "to get away from it all," they often can only afford to hike or bike in wilderness or quasi-wilderness type areas "to get away from it all"! No provisions should be enacted which grant an advantage to the rich, as against the poor, in the ability to enjoy unroaded natural areas in a non-injurious manner. (Individual, Bishop, CA - #A20954.17120)

**838. Public Concern: The Forest Service should ensure equal hunting and fishing fees in all states.**

I also want to comment that all public lands should be accessible to all the public! Hunters and fishermen should not have to pay extremely high fees and licenses should be available for hunting and fishing for the same price for anyone from any state because it is federal public land. There should be a standard license fee set up and all states would charge the same for hunting or fishing on federal public lands. Lets equalize the fees so some states cannot gouge the public when they use the federal public lands. (Individual, Bellingham, MN - #A7339.17120)

## **Subsidies and Agency Expenditures**

### **Summary**

The topic of subsidies and agency expenditures generates a great deal of comment related to the economic effects of roadless area conservation. A number of respondents discuss the issue of subsidies for commodity users across National Forest System lands generally, and state that these subsidies also drive timber removal in roadless areas that would otherwise be uneconomical. Overall, respondents assert that private industries should not be subsidized to remove natural resources from public lands. They state that environmental degradation, restoration efforts, and deferred maintenance costs only add to direct subsidies, resulting in even greater losses to taxpayers. Such subsidies on the Tongass National Forest are a particular topic of comment to respondents, who often cite multimillion dollar annual losses to the U.S. Treasury as ample

reason to extend a national roadless rule to this national forest (see also Chapter 5: Designating Areas (Question 8): Inclusion/Exclusion of Specific Areas from a National Roadless Rule: *Inclusion*). Some respondents ask that any remaining long-term contracts be immediately cancelled. Others assert that subsidies are unfair competition with their own businesses, whether harvesting timber from private lands or producing recycled products as an alternative to virgin lumber. Several respondents suggest that, rather than allowing below-cost timber sales, the Forest Service should disburse subsidies directly to timber workers.

A number of respondents call for the Forest Service to end all below-cost sales, and to account for all costs in these calculations, including non-market costs. Some request that the true market demand for Tongass timber be recalculated to include the incentives to over-consume based on artificially low prices due to subsidies. Others ask that a more careful study of economic factors be carried out when making any timber sale decisions in roadless areas; such factors, people say, should include increasing agency losses in the timber program and rapidly increasing costs of road rebuilding and maintenance.

Some request that the Forest Service hold timber companies more fiscally accountable for the effects of their actions. Suggestions from the public include requiring companies to post bonds to cover the cost of restoring any damage to ecosystems, requiring companies to remove slash and to pay for all road-related costs, and deferring payments or credits until full stand replacement is verified. Some state that the agency should regulate timber companies as monopolies, with fixed rates of return and careful oversight.

Others assert that entrenched subsidy and personnel advancement policies within the Forest Service create incentives for employees to continue to support an otherwise unjustifiable timber program. According to one individual, the Forest Service should reform its financial incentive system that promotes active management in roadless areas and removal of old-growth timber, which this person believes ignores long-term ecological considerations necessary to ensure healthy, diverse ecosystems. This individual also writes that the Agency should no longer use Timber sales as employee incentives, bonus programs, or determining factors in funding jobs and programs. As an alternative to timber subsidies, some respondents ask that the Forest Service redirect these funds to ecosystem restoration efforts, sustainable timber removal in roaded areas, or private tree farms. Several also request that the Agency end subsidies to ranchers with allotments on National Forest System lands.

### **839. Public Concern: The Forest Service should not subsidize extractive industries on public lands.**

More roads in such areas will remove more acres of land from production and threaten our water sheds, clean air, agricultural and recreation opportunities, and ultimately our local economy. Real costs can not be recovered by timber sales on public lands, and mining development usually results in costing more in local and federal clean-up and restoration expenses than it gains in tax revenue from the responsible companies. The price is too high for the taxpayer and the economy. (Individual, Bozeman, MT - #A6077.75600)

#### **BECAUSE THE REAL VALUE OF FOREST LANDS LIES IN THE ECOSYSTEM SERVICES THEY PROVIDE**

I think the economic value of logging has been overrated compared to the economic value of roadless areas, including tourism and local use related to fishing, hunting, rock climbing, backpacking, backcountry skiing, and wildlife/landscape viewing and photography. The economy of the Mountain West is in transition away from extractive resource-based industries, and resource management should recognize this. The economic future of the Mountain West will depend more and more on beauty,

recreation, and intact ecosystems. Let us not continue to subsidize destructive activities incompatible with the real value of this country. (Individual, Manhattan, MT - #A671.75310)

I am deeply concerned about the use of taxpayer dollars to subsidize the overuse and destruction of our publicly owned natural resources. This especially applies to roadbuilding in our National Forests. We must wisely use this land and I believe that the ecological service it provides will grow in importance as time goes on. Therefore, I urge you to let the roadless Area Conservation Rule stand as it is written in the January 2001 Record of Decision. (Individual, Fayetteville, AR - #A333.75600)

#### **BECAUSE SUBSIDIZATION AMOUNTS TO CORPORATE WELFARE**

Just like the guy who gets laid off from Motorola, so too must the logger/rancher adjust to the changing times? It is not the forest service's job to subsidize these industries with corporate welfare. (Individual, Wheaton, IL - #A52.75600)

It is apparent that our National Forests have historically been used as a corporate welfare program for the timber, mining, and oil industries. I believe that saving the last 30 percent of America's wild national forests from further corporate degradation is not only a reasonable compromise, but a critical step to take if we as a society hope to maintain wildlife habitat, protect water quality and preserve some of the last truly wild places. (Individual, Portland, OR - #A268.75600)

There is no value in a below-cost timber sale, but that is what we are being asked to support. This is corporate welfare at its worst, and don't think that millions of us Americans fail to make the connection between campaign contributions and losses to the treasury due to under cost timber sales. (Individual, Missoula, MT - #A1933.75610)

A key point U.S. Senator McCain makes repeatedly is that large corporations are the beneficiaries of large amounts of undue public largesse. The mining and timber industries are classic examples of this cronyism capitalism, something our country frowns upon when it happens in other nations. The Forest Service has a limited budget, and it cannot even afford the full costs of maintaining existing roads it built that give large mining and timber companies access to federal lands. Your departmental budget and that of every other federal department is likely to get even more limited, given other spending priorities and shrinking available taxpayer dollars. Much lip service is paid to cost-benefit analysis when it comes to environmental protection, but the same kind of cost-benefit study never seems to surface when it comes to the return on investment of taxpayer-subsidized environmental degradation. In our view, that was former Interior Secretary James Watt's greatest failure. We can respect, if not agree with, a position that all available natural resources are to be exploited in the name of free enterprise. However, there is no business case in any capitalist sense for unprofitable resource extraction. The only way it pays for mining and timber companies to exploit public lands is if they can externalize much of their true costs onto the backs of taxpayers, letting us foot the bill for the access roads and the cleanups. (Individual, Forest Hills, NY - #A6156.75600)

#### **BECAUSE IT IS UNFAIR COMPETITION WITH PRIVATE FOREST OWNERS**

Continuing to allow taxpayer subsidized harvesting is unwarranted competition or private forest owners. (Individual, Salem, OR - #A8263.75610)

As a private landowner (400 acres) of timberland, I ask that you not open the roadless areas to timber harvest. This puts the government in competition with woodland owners because of subsidies for roadbuilding. (Business, Portland, OR - #A37964.75600)

#### **BECAUSE IT IS UNFAIR COMPETITION WITH RECYCLED PRODUCTS**

Since the roads built through our Federal Forests (using tax dollars) often primarily serve private firms' needs to move timber, this rule is a critical step to reduce the subsidies for virgin materials that make it difficult for recycled products to compete. (Elected Official, Bronx Borough, NY - #A15554.75610)

When the government makes extractive resources cheaper—more available, it kills recycling—offices buy new paper because it is so cheap! Please help the market help the people and the future of our economy—don't weaken the Wild Forest Protection Plan! (Individual, No Address - #A1542.75000)

**840. Public Concern: The Forest Service should recognize that the value of removing timber is outweighed by the cost of mitigation measures made necessary by harvesting.**

When industry builds roads in the forests around the region I live in the government is required to build to a standard and to protect water quality from run off. The amount of personnel required to design and implement and the standard to which construction must be done makes the cost higher than the timber being harvested. (Individual, Lakeside, MT - #A5234.10111)

**841. Public Concern: The Forest Service should not allow below cost timber sales to occur.**

**ADD A DIRECTIVE THAT NO TIMBER SALES WILL BE ALLOWED WHEN FULL COSTS EXCEED RETURNS BY MORE THAN 10 PERCENT**

[Adopt] "No timber sales shall be made unless the benefits to the United States exceed the costs thereof, taking into consideration the costs of all payments to local governments (in lieu of taxes or otherwise), all credits against sales proceeds for road construction or other credits, costs of revegetation, and reasonably quantified costs to watersheds, watercourses, and commercial and game fish."

If possibly you feel that such a provision might be too strict, then please provide, instead, that those costs cannot exceed the sales proceeds (without credits) by more than ten percent. The Forest Service will be able to cost-out a timber sale to determine whether it is having a favorable financial impact. Therefore, it would appear in the great interest of the taxpayers that the Service adopt a regulation supplementing this rule or otherwise that, whenever a sale is shown likely to be unfavorable financially, then it [will] not be offered. We do not believe it is fair to the government's other efforts (such as defense, education and prescription drug benefits) or to the taxpayers that the costs of any sale should exceed the sale's proceeds by more than 10%; to do otherwise would be running too large a program deficit! (Organization, Birmingham, AL - #A21582.75610)

**BECAUSE IT IS UNFAIR TO TAXPAYERS**

The whole public owns the national forest; they're tired of having their tax dollars subsidize giant timber companies. The U.S. Forest Service loses hundreds of millions of dollars a year in below-cost-timber sales. (Individual, Lafayette, CO - #A807.75000)

I grew up in the Pacific Northwest. In my lifetime I watched clear-cut logging destroy our old growth forests in order to sell raw logs (with no value added quotient) to Japan. The taxpayer's subsidized this logging activity while the timber companies made all the profits. Next when the salmon runs were decimated from instream sedimentation, the taxpayer had to buy the fisherman's boats. Finally for the final fiscal insult the taxpayer paid to clean up small towns in W. Washington which were predictably flooded by spring run off coming unimpeded through the logged areas. (Individual, Bozeman, MT - #A7094.75600)

**BECAUSE THE U.S. IS FACING BUDGET DEFICITS**

Many of the roadless areas protected by the Conservation Rule would have been timbered if it were cost-effective to do so. However, many are too steep or too remote or, due to other factors, are not cost-effective to timber. It has been reported that the Forest Service, until recently, had lost between \$800,000 and \$1.2 billion every year on timbering in the national forests. In a recent year, \$29 million was lost in timber sales in the Pacific Northwest alone. Even though we are having some budgetary surpluses, it clearly appears that they are not as large as were anticipated and that we might be in a deficit position in the next few years. The nation, consequently, should not engage in subsidizing private interests when that is destructive of a natural resource. (Organization, Birmingham, AL - #A21582.75610)

**BECAUSE TAX DOLLARS ARE NEEDED FOR OTHER PROGRAMS**

If you do not wish to support the Roadless Area regulations (notwithstanding their support by the public), then please adopt fiscal directive prohibiting any sales that are not cost-effective to the government. In these days when the Administration has enacted a tax cut and also wishes to pay down the national debt and expand expenditures for defense, education and prescription drugs/Medicare benefits (all "big ticket" items), we just cannot afford any programs than lose substantial money! Therefore, in lieu of supporting the roadless area regulations and so as to save needed funds of the Forest Service, we urge you to adopt a fiscal directive that: "No timber sales shall be made unless benefits to the United States exceed the costs thereof, taking into consideration the costs of all payments to local governments (in lieu of taxes or otherwise), all credits against sales proceeds for road construction or other credits, costs of revegetation, And reasonably quantified costs to watersheds, watercourses and commercial and game fish." If you feel such a provision might be too strict, then please provide, instead, that those costs shall not exceed the sales proceeds (without credits) by MORE THAN 10%; to do otherwise would be running too large a program deficit! (Individual, Birmingham, AL - #A4991.75610)

**BECAUSE THEY PRODUCE ROADS THAT THE FOREST SERVICE LACKS THE FUNDING TO MAINTAIN**

Regarding economics, I hope it is more than obvious that no more below costs timber sales should occur. The roads we all end up paying for are not an asset when we have a huge backlog of needed repairs and maintenance on existing roads. (Individual, No Address - #A405.75610)

The federal government should NOT be subsidizing the forest products industry by building roads into these areas. Unfortunately there is a long and disgraceful history of the Forest Service building roads into these types of areas at the public expense to allow logging. In many, if not most, cases construction of the road network required to conduct the logging operations costs more than the value of the timber. This practice should not continue. (Individual, No Address - #A621.75600)

Economics alone should dictate that no new roads be constructed on public lands. We already have tens, if not hundreds of thousands of miles of roads, which have resulted in a maintenance backlog of billions of dollars. As a society, we cannot afford to maintain and monitor this sprawling network of roadways, nor should we desire to. In fact, I encourage the Forest Service to reclaim unnecessary roads wherever possible. The construction of new roads is certainly contrary to sound economic judgment. (Individual, Durango, CO - #A5420.75000)

Common sense (particularly the fiscal common sense touted by the Bush administration) should tell you that NOT building further roads into the backcountry represents a sound financial decision. Your own figures show the USDA Forest Service can't afford to maintain the roads already on the forest, much less allow for additional ones. (Individual, Atlanta, GA - #A26430.10150)

Protecting and preserving the remaining roadless areas on our public lands serves the public in many ways. The network of roads in the roaded portions of our public lands is already excessive and unmanageable. The U.S. Forest Service road maintenance program costs American taxpayers hundreds of millions of dollars per year and currently suffers a debit of hundreds of millions of dollars. U.S. Forest Service annual reports for every year since 1996 reveal further costs to the taxpayer in the form of heavily subsidized logging, mining, and grazing of our public lands all of which fail to return even the cost of administration. Yet these industries enjoy a second round of subsidies in the form of roads built across our public lands primarily to support extraction of natural resources with recreational access an afterthought often used [as] an excuse to perpetuate already heavily subsidized industrial use of our public lands. (Individual, Kennewick, WA - #A23359.75600)

**842. Public Concern: The Forest Service should revise funding and staffing incentive policies that allow timber management to dominate forest values.**

We think the agency lacks the incentive to balance the conflicting values of forest users. We think the incentives accrue to dominance and control on the side of timber management, rather than to balance,

because of fundamental flaws in the funding mechanisms. We have sat through too many interdisciplinary team meetings where the professional judgment of [wildlife] biologists is overridden by the dominance of the timber line officer; where the principles of watershed management offered by the hydrologists and geologists are squelched and censored by the dominance of the timber management staff; where scientific findings have been “reinvented” to satisfy the objectives of the timber management staff; where planning staffers, upon reaching consensus with conflicting interests, have expressed the frustration that we cannot implement the consensus because it will never be funded; where we have preferred trade-offs and bargained in “good faith” to achieve agreements with others, only to have reviewing officers accept our proffered by renegeing on the trade. We think these types of events transpire because funding allocations make timber management the dominating, controlling force in the agency. (Organization, Damascus, VA - #A17723.15122)

It is time for the Forest Service to reform its financial incentive system that promotes roadless area development and harvesting of old growth timber, causing your agency to ignore long-term ecological considerations necessary to ensure healthy, diverse ecosystems. Timber sales should no longer be used as employee incentives, bonus programs, or determining factors in funding jobs and programs within the agency. (Individual, No Address - #A15267.17100)

**843. Public Concern: The Forest Service should implement a national roadless rule.**

**TO COUNTERACT REVERSE ECONOMIC INCENTIVES AT THE LOCAL LEVEL**

We strongly oppose weakening nationwide protections for our remaining roadless areas through forest-by-forest decisions based on extraction rather than conservation. Extraction economics characterized by reverse incentives such as “purchaser road credits” and the Knutson-Vandenberg Act have undercut forest stewardship and imperiled our public lands through road building, logging, mining, and access by off-road vehicles. Please fully implement the January 2001 version of the final rule so enlightened management will finally prevail. (Individual, Oakland, CA - #A11880.75610)

**844. Public Concern: The Forest Service should eliminate below-cost timber sales and raw log exports on the Tongass National Forest.**

In recent years, the Forest Service has spent on average \$40 million more a year selling timber from the Tongass National Forest than it has returned to the U.S. Treasury. IN 1992, THE TONGASS TIMBER PROGRAM COST U.S. TAXPAYERS OVER \$64 MILLION, LOSING MORE MONEY THAN ANY NATIONAL FOREST IN HISTORY. Almost all Tongass timber is exported in nearly raw form, either as pulp or cants, squared-off logs, to the Far East where it is then processed into higher value products for export back to the U.S. In 1992, for example, 97 percent of the timber products and pulp produced in the Tongass and 72 percent of the cedar logs were exported to Japan. A smaller fraction of Tongass timber was shipped to other nations including Taiwan. (Organization, Missoula, MT - #A17234.75610)

**845. Public Concern: The Forest Service should improve methods for calculating true market demand for Tongass timber.**

**INCLUDE THE COST OF SUBSIDIES**

The Forest Service has overestimated true market demand in the Tongass by failing to take into account the subsidies included in every Tongass timber sale. Market demand depends on many variables, especially the price of obtaining timber. However, the Forest Service definition of market demand relies heavily on mill capacity, with little regard for the price that the public landowner (the Forest Service) might find appropriate to charge for timber. The agency’s interpretation of “market demand” overlooks a fundamental fact: If the U.S. government gives the timber away for free, or charges nominal cost (as it currently does), demand will be substantially higher than if the government charges prices comparable to private suppliers. The Forest Service is under no legal obligation to supply timber to Alaska mills on environmental or financial terms that ensure the mills can make a profit.

The industry claims the lower prices paid for federal Tongass timber reflect government use restrictions (namely, local processing requirements) and higher environmental standards for logging. However, “market demand” for that private timber is reflecting its own implicit subsidies. The biggest subsidy is private landowners’ ability to shift the environmental costs of widespread, unsustainable clearcutting onto third parties (usually, the general public). If that implicit subsidy for environmental costs were removed and those costs were put back onto the landowner or timber buyer, the private owners would have to charge a higher sale price, which in turn would tend to decrease market demand. (Organization, Sitka, AK - #A30486.75600)

#### **846. Public Concern: The Forest Service should consider additional factors in timber sale decisions.**

##### **CONTINUAL AND GROWING CASH FLOW LOSSES**

In 1980 the Forest Service substituted the term “Suitable For Timber Production” for the long-used term “Commercial Forest Land” (CFL). To qualify as CFL forest land must be able to grow 20 cubic feet of industrial usable wood annually. As Forest Plans were approved, 30,480,000 former CFL acres were eliminated from the “Suitable” rating, at 40% drop from 77,752,000 acres to 47,272,000 acres in 1998. Most of this elimination of acres from the timber base was in the 1980s. There are 165 Proclaimed Forests organized as 109 Administrative Forests. Four of these Forests cut timber, but lack any land rated “Suitable”. 14 Forests list 4,824,000 acres as “Suitable”, but their average annual timber growth rating fails the 20 CF CFL test; it is only 16 cubic feet a year, 20% under the CFL minimum. Therefore only 91 Forests have only 42,448,000 timber acres that pass the 20 CF test. Actually, there also may be areas on the 91 Forests that fail the 20 CF test. The amount of timber that can be cut each decade fell even more. This is called the “Allowable Sale Quantity”, ASQ. Since 1980 the 15,064 MMBF ASQ, fell to 6,959 MMBF a reduction of 8.105 MMBF as 54% decline. Most of that drop was in the ‘80s as new Plans were approved. There was no outcry from the timber industry in the Reagan-Bush Administration similar to the current one. As a reality check, when the 14 Forests that fail the 20 CF test are removed, the ASQ falls to 6.694 bil. BF. Leaving aside for the moment, the pervasive timber sale cash flow financial losses, also a characteristic of these 18 Forests, there are only 91 Forests with 42,448,000 acres rated Suitable for Timber Production, with an annual ASQ of 6.694 bil. BF. Continual and growing cash flow losses are not factored in to decisions to sell timber. (Professional Society, Saint Leonard, MD - #A9040.65260)

##### **RAPIDLY INCREASING ROAD REBUILDING COSTS**

In 1998 to run timber sales nationally 11.3 miles of existing logging roads were rebuilt for every new mile. It doesn’t take a genius to figure out that the Forest Service has serious road problems. 92% of the miles of timber roads built-rebuilt were financed by reducing the price of the timber to compensate timber firms for the estimated cost to build these roads. In addition millions engineering and inspecting these roads. A mere 13% of the timber road miles are built with appropriated money. In 1998 the cut was only 3.3 billion BF logging 525,000 acres. The ratio of miles rebuilt to new miles has grown every year, despite the cut falling to 60% of the 1992 level. Viewed over the long term, road deterioration is a growing cancer affecting streams, watersheds, soils and fish. For example, on the money-losing Tongass the road cost runs at least \$75,000 per mile. (Professional Society, Saint Leonard, MD - #A9040.75610)

#### **847. Public Concern: The Forest Service should impose greater fiscal requirements on timber companies.**

##### **REQUIRE TIMBER COMPANIES TO COVER THE FULL COST OF ANY ROAD CONSTRUCTION, REMOVAL, OR RESTORATION**

Forest timber sales should be made only at prices that reflect both the true value of the products harvested at a fair market price. The logging companies should pay for the cost of any road construction—under strictly supervised and environmentally sensitive methods—and then pay for the cost of removing/restoring roads or other damage if deemed appropriate by an agency and citizen committee. (Individual, San Antonio, TX - #A428.75800)

All costs of maintaining present roads (logging) roads and all other forest service costs associated with logging, should be fully and directly charged to timber companies prorated in relation to the board feet each harvests out of the total harvest. (Individual, Scio, OR - #A14375.17000)

The cost of building and closing of these roads reclaiming and seeding of the harvested areas should be shared with the harvester. (Individual, Rock Springs, WY - #A5695.75600)

The only problem with the roadless initiative is that it has too many loopholes and not enough protection of forests and the public interest. If there are to be any changes, they should consist of strengthening it, such as: Loggers, miners, and other beneficiaries of past roadbuilding must be required to pay all costs of remediation of the erosion, sedimentation, water quality degradation, destruction of fish habitat, and other damages that have been caused by roads. (Individual, Oakland, CA - #A28134.75400)

#### **REQUIRE TIMBER COMPANIES TO POST BONDS FOR RESTORATION**

The only problem with the roadless initiative is that it has too many loopholes and not enough protection of forests and the public interest. If there are to be any changes, they should consist of strengthening it, such as: Require the posting of a bond sufficient in size to cover restoration costs over multiple generations. (Individual, Oakland, CA - #A28134.75400)

#### **REQUIRE TIMBER COMPANIES TO REMOVE SLASH AFTER LOGGING**

The Forest Service does not require the timber industry to clean up after logging, slash piles are left for the Forest Service to clean up and the service is not funded to do the job. (Individual, Mesa, AZ - #A99.30100)

#### **REQUIRE TIMBER COMPANIES TO ASSUME DIRECT FINANCIAL LIABILITY FOR ENVIRONMENTAL DAMAGE NOW AND IN THE FUTURE**

Companies working with our natural resources shall assume full liability for any damage, including that not discovered until future generations, with no possibility of bankruptcy, and no shield of liability for the managers or investors. If we as a society are putting our living priceless natural resources at risk, the very least a company and its people can do is place their monetary resources at risk. (Individual, Oakland, CA - #A28134.75400)

#### **PLACE ALL TIMBER CONTRACT PAYMENTS IN ESCROW UNTIL FULL STAND REPLACEMENT IS VERIFIED**

All revenues from extraction of natural resources are held in escrow until replacement of the natural resources is confirmed. In the case of trees, this would take a minimum of decades. In the case of old-growth, this would take a minimum of centuries. Loggers are fond of saying there's nothing wrong with their practices, it will all grow back. OK, let them put their money where their mouth is. If it does grow back, then they'll get paid. If it doesn't, they're the ones who should take the loss, not the public. Anything less than this is a subsidy—i.e. a welfare program. (Individual, Oakland, CA - #A28134.75400)

### **848. Public Concern: The Forest Service should ensure that sales of resources are competitive.**

#### **BY ELIMINATING LONG-TERM CONTRACTS**

I would like to preserve the logging industry, access to rock resources and other natural resources. Sales of resources and leases should be aggressive and competitive, with no long term agreement dates where values might change over time. (Individual, Lacey, WA - #A17762.15160)

### **849. Public Concern: The Forest Service should recognize the budgetary benefits of prohibiting timber removal and road building in roadless areas.**

Strict protection of all roadless/unroaded areas also responds to budgetary concerns and the need to balance forest management objectives with funding priorities. It is a well known fact that management that suspends logging and road building and other developments on a National Forest is much cheaper to

implement than management that does not suspend such activities. As an example, Alternative 3 (which did not allow logging and new road construction) examined for the 1993 GWNF Plan Revision had by far the least cost to implement of any of the 14 alternatives considered in detail (see page B-100 of GWNF FEIS). Its budget was less than 60% of the budget for the alternative (8A) chosen by the FS to implement. Implementation of Alternative 3 would save the US Treasury and US taxpayers over \$6 million dollars a year on this one Forest alone. In addition, Alt. 3 had the highest benefit to cost ratio of any of the 14 alternatives (GWNF FEIS B-99). It is therefore reasonable to expect great benefits to the U.S. treasury and American taxpayers to similarly accrue from a prohibition on logging and road building in roadless areas. (Individual, Staunton, VA - #A29325.17100)

**850. Public Concern: The Forest Service should regulate all commercial activities as monopolistic public utilities with fixed rates of fair return.**

COMMERCIAL ACTIVITIES and RESULTING PROFITS. Commercial activities allowed on public lands should be allowed, if at all, subject to a public sealed bidding process and a review to ensure profits are not unreasonable. Operations allowed in limited areas of public lands intrinsically enjoy a certain degree of monopolistic benefit. As such, they should be subject to public scrutiny and regulation (as are public utilities) designed to ensure that this monopolistic advantage does not result in "UNDUE PROFITS" at the cost of the public affected by their activities. I propose as a very important general principle that any NOT non-profit operation authorized in or affecting these public lands be restricted to receiving no more net profit than that which constitutes a "fair return" on time and investment, exactly as public utility companies have been for many years. These determinations should be subject to full disclosure and public review, and any excess profits which may occur should be returned, with interest, to the people overcharged or to the authorizing agency. (Individual, Bishop, CA - #A20954.75500)

**851. Public Concern: The Forest Service should disperse subsidies directly to local workers rather than remove unprofitable timber.**

Have you ever considered simply disbursing the dollars that you presently spend to log National Forests to the people who have traditionally earned a living from this? This would be very much like the farm subsidy system that is presently in place. This could be completely eliminated after one generation. (Individual, Asheville, NC - #A6246.75600)

**852. Public Concern: The Forest Service should buy back timber sale contracts.**

As an adjunct to the present administration you should be raising the necessary funds to "buy off" the timber interests, and let them out to pasture (those who have been habitually involved with timber and can live no other way, nor can they be retrained to function sanely in any other occupation, as their heart will just not be in such "retraining programs"). They need to be pensioned off, and fund-raising then needs to be conducted to develop and produce any and all alternative products to wooden construction. To fail to do this is surely to monkey seriously with the regard and REKNOWN with which present and future generations will view the likes of you! (Individual, Bellingham, WA - #A1928.17000)

**TO HELP COMMUNITIES ADAPT ECONOMICALLY**

[Manage] as naturally as possible. NO LOGGING of salvage timber. No timber sales of any kind. If necessary buy back the contracts that have already been sold and help communities economically so they can sustain the changes. (Individual, No Address - #A29275.30100)

**853. Public Concern: The Forest Service should provide economic incentives for responsible use of natural resources in roaded areas.**

Provide economic incentives to behave responsibly, and renew our resources. If logging groups truly do so, they should not have to keep expanding into new areas. Provide additional incentives to recycle forest-derived resources to companies and individuals to reduce the demand for these resources. This is going to HAVE to happen sometime-why not now, before the situation is desperate and logging companies log themselves out of business? (Individual, Arlington, MA - #A1152.75000)

**854. Public Concern: The Forest Service should subsidize commercial tree farming as an alternative to logging public lands.**

Commercial tree farming is one alternative to logging public lands. If the government can afford to subsidize tobacco growers, why not subsidize tree growers? (Individual, Killeen, TX - #A43260.75600)

**855. Public Concern: The Forest Service should devote more money and time to conservation.**

One of the worst things about my job (besides the paycheck) is the thought of what is happening to forests throughout the world . . . I'm sure some of the forest destruction is inevitable, so many countries having floundering economic bases but the US . . . look at this time of economic prosperity, you'd think there would be more money and time to devote to the conservation of nature. (Individual, Allston, MA - #A186.75950)

**856. Public Concern: The Forest Service should subsidize wildlands restoration.**

Restoration of wildlands will take taxpayer subsidies, but as a taxpayer, I prefer to subsidize restoration rather than below cost timber sales. I do not think our slow growing northern forests can sustain the level of harvest required to keep busy the increasingly mechanized timber industry. More and more jobs will need to come from restoration. Restoration jobs rebuild communities and souls as well as ecosystems. (Professional Society, Missoula, MT - #A17054.75610)

**857. Public Concern: The Forest Service should not subsidize ranching.**

Ranchers' cattle are hurting national forests and ranchers get too good a deal for the pasture land. They should be charged much more. I pay more for an out of state hunting license than they do for a whole herd of cattle grazing for a year. (Individual, No Address - #A417.75620)

Remember that its time to start charging accurate rates for the grazing done on public land. (Individual, Blue Springs, MO - #A7209.75600)

Grazing, also, must now pay fair market value for grazing AUMs. Public land AUMs cost well below private sector ones. In too many areas, especially riparian, the damage from cattle and sheep in already fragile areas, is irreversible. (Individual, Kemmerer, WY - #A8383.75620)

Perhaps grazing fees should be increased to reflect a more realistic market value of the land and its use. (Individual, No Address - #A29334.90110)

## Heritage Resources

This section includes one subsection: Heritage Resources General.

### Heritage Resources General

#### Summary

Some respondents assert that roadless areas themselves constitute our national heritage and can best be protected through a national rule. Others specifically mention the need to preserve cultural and heritage resources such as historic sites and structures. One organization writes in that they are concerned about the preservation of old mines, cabins, settlements, railroads and other features used by pioneers, homesteaders, loggers, settlers, and miners, many of which they believe are located in roadless areas. While some respondents assert that a national roadless rule will aid in conservation of these resources, another respondent suggests that such a rule will hinder access, maintenance, and protection of heritage resources. State representatives request a complete inventory of heritage and paleontological resources in Wyoming that may be affected by a national rule. They request consultation with state historic preservation offices, American Indian tribes, and the Advisory Council on Historic Preservation to facilitate this process.

#### **858. Public Concern: The Forest Service should preserve America's national heritage.**

##### **BY PROTECTING ROADLESS AREAS**

Our nation's remaining roadless wild-lands should be protected not only to preserve wildlife, water purity, clean air, recreation areas, scenic values, cultural and historic sites, etc., etc., etc., (I could go on!), but also, quite simply, because they are part of our national heritage. Our great American landscape—the Rocky Mountains, the forests of the Pacific Northwest and Alaska, the swamps of the South, the woods of New England, and the Desert Southwest are not only God's wonderful creations, but they also serve and have served as a glorious backdrop for the great events of American history. We would not be who we are without them. Please protect these lands and let the roadless rule stand. (Individual, Summit, NJ - #A608.50000)

I do not want to see our National Heritage wiped out because our lawmakers were too influenced by shortsighted capitalists. Consider the future, and support this important conservation effort. (Individual, Cambridge, MA - #A1244.80100)

The roadless area conservation measures that have been placed on National Forest Service (NFS) lands afford a level of protections to NFS cultural resources that have not existed previously. Our heritage resources are endangered by any changes that weaken or render ineffective the cultural resource protection and Enhancement of the Cultural Environment. Federal agencies have been inventorying historic and prehistoric sites located on lands they manage. The NFS has inventoried over 277,000 heritage sites since 1973, and this is estimated only to represent about 25% of all their lands. Mike Kaczor of the U.S. Department of Agriculture Forest Service therefore estimates that NFS lands may contain up to one million prehistoric and historical heritage sites. These sites contain irreplaceable information of scientific and cultural value and historic importance to our nation. Therefore we are officially opposed to any attempts to repeal the roadless area conservation measures presently in place. The laws, regulations and enforcement of them need instead to be strengthened to preserve our cultural resources, so that future generations can appreciate the full value of our heritage. (Organization, Middleboro, MA - #A23043.80110)

**BY PRESERVING HISTORIC STRUCTURES AND TRADITIONS IN ROADLESS AREAS**

We are concerned about the preservation of old mines, cabins, settlements, railroads and other features used by pioneers, homesteaders, loggers, settlers, and miners. Many of these are located in roadless areas. These are important cultural resources and should not be removed from the landscape. Western culture has been characterized by opportunities to work with the land and preservation of any remnants of this culture is important. Current land management practices are not adequately protecting these resources and western culture including the opportunity to work with the land. (Organization, Great Falls, MT - #A15315.80100)

**859. Public Concern: The Forest Service should identify historic properties which may be affected by a national roadless rule, and assess and resolve any adverse impacts.**

**IN CONSULTATION WITH STATE HISTORIC PRESERVATION OFFICES, AMERICAN INDIAN TRIBES, AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**

Management of cultural resources on U.S.D.A. Forest Service (USFS) projects is mandated by, and conducted in accordance with, Section 106 of the National Historic Preservation Act and advisory Council regulations 36 CFR Part 800. These regulations require the USFS to initiate the Section 106 process (36 CFR Part 800.3), identify historic properties which may be affected by the project (36 CFR Part 800.4), assess any adverse effects which may result from the project (36 CFR Part 800.5) and to resolve these adverse effects (36 CFR 800.6). These efforts must be conducted in consultation with the Wyoming State Historic Preservation Office and any interested publics, Native American Tribes, and the Advisory Council on Historic Preservation as appropriate. All documentation of these efforts must meet the Secretary of the Interior's Standards for Archaeology and Historic Preservation (48 FR 44716-42). Provided the USFS follows the procedures required by federal law and established in the regulations, we have no objections to the project. (State Agency, Cheyenne, WY - #A22609.20000)

**860. Public Concern: The Forest Service should preserve cultural resources.**

**BY PROTECTING ROADLESS AREAS**

Wilderness and roadless areas are where I (working as a Forest Service archaeologist) can locate historic and prehistoric cultural sites which have not been impacted by other recent development. Prehistoric use of high mountain lakes within some of our present designated wilderness areas, was as important to some people hundreds and thousands of years ago as it is for me and many others today. These remote areas support a variety of plants and animals not found where man dominates. (Individual, Troy, MT - #A1180.80100)

**BY PROHIBITING ROAD BUILDING IN THE TONGASS NATIONAL FOREST**

I oppose building new roads in the Tongass Nat'l Forest. I live in Tenakee Springs and feel some of my favorite places in this Inlet are in jeopardy if the ban on roads is lifted.

In Crab Bay there is a large and complicated petrograph that could be harmed by creation of road access. It would be a great loss to the early history of the area and perhaps to the native culture if these were exposed or harmed.

Please take steps to assure a no road policy in the Tongass Nat'l Forest. (Individual, Tenakee Springs, AK - #A5144.45623)

**861. Public Concern: The Forest Service should ensure motorized access to historic sites in roadless areas.**

We are concerned about the loss of access to historic sites that each closure may produce. That is an example of denying motorized visitors, handicapped, elderly, and physically impaired, access to the forest with out adequately addressing site specific and scientific reasons why. We request that the Forest Service analyze all the roads, trails, and features of interest that they provide access to in this area to determine the benefits of each route. These benefits must be carefully considered in the decision to keep a route open or to close it. (Organization, Great Falls, MT - #A15315.80000)

In addition to taking steps to protect our local western culture, federal agencies should implement a roadless rulemaking alternative that include these features [old mines, cabins, settlements, railroads and other features used by pioneers, homesteaders, loggers, settlers, and miners] as part of motorized interpretative destinations and loops. (Organization, Great Falls, MT - #A15315.80100)

**862. Public Concern: The Forest Service should provide a detailed analysis of paleontological resources in roadless areas covered by a national rule.**

**IN WYOMING**

We believe it is important that the following issues must be addressed in the underlying EIS, on a Wyoming-specific scale:

A detailed analysis of the paleontological resources that are present in the areas proposed for closure. (State Agency, Cheyenne, WY - #A22609.10135)

