Chapter 5
Forest Management

This chapter includes four main sections: Forest Management, Activities (Question 7), Designating Areas (Question 8), and Agency Organization and Funding.

Forest Management

This section includes three subsections: Forest Management General, Adequacy of Analysis, and Roadless Areas General.

Forest Management General

Summary

A number of people comment about the Forest Service and its management of public lands generally, rather than its management of roadless areas. Some members of the public state that the Forest Service should shift toward a more balanced management strategy that focuses on recreational uses rather than commodity extraction. Others assert that the Agency has shifted too far toward environmental protection and needs to reemphasize traditional multiple use strategies which include commodity extraction and motorized recreational uses. (See also Chapter 1: National Roadless Protection – General Remarks: Need for a National Roadless Rule General and Need for the Roadless Area Conservation Rule.)

A few individuals suggest new approaches to timber and forest health management, calling for a new ethic of stewardship and ecosystem restoration among land managers. Suggestions include allowing local residents to conduct small-scale restorative logging and to help with controlled burns and fuels reduction, and agency support for the generational land steward program. These respondents state that non-traditional agreements are needed as a substitute for large-scale commercial contracts in order to support local economies and restore forest health. A few people suggest regional or local forest planning processes that should serve as models for the Forest Service as a whole or for its roadless area management, such as the Sierra Nevada Ecosystem Project and the Black Hills Forest Plan.

Others discuss organizational structure and the administrative framework of the Forest Service. Some comment that the Forest Service at the national level should ensure consistent decision-making at the local level; this assertion is echoed in comments which request implementation of a national rule. Some believe that the current agency structure is too complex, and that forests should be consolidated for more efficient management. A few individuals say they are dissatisfied with present Forest Service management and suggest that all roadless areas be turned over to the U.S. Department of Interior or the Park Service if traditional multiple use management is no longer practiced. Others suggest that National Forest System lands be privatized or turned over to local government control.

863. Public Concern: The Forest Service Chief should guide the Agency in the direction of balanced management.

EMPHASIZING RECREATIONAL IMPROVEMENTS RATHER THAN TRADITIONAL EXTRACTIVE USES

I still am in favor of roadless areas and wilderness! I hope to God, Mr. Bosworth, that you have the guts it will take to face off with the President and the lumber lobby, the mining for the past 30 years—preserve our wilderness and roadless lands! Your 2nd big challenge will be to turn the Forest Service around to an agency interested in helping the public—not restricting it! I have watched for years now as you have spent my hard earned tax dollars blocking me from admission to the forest system. It is an affront I can hardly begin to describe! Go back to the days of well-maintained trails, good forest campgrounds, cable cars across streams, and the green truck the sign of a friend coming to help. You have inherited an agency at the bottom of its historical abyss—you can either turn it around into the proud agency it once was—or you can continue on the present path until some visionary president disbands the agency and replaces it with something new. Barring huge change—I would vote for immediate dismantlement—you are currently doing no one any good, and you cost a hell of a lot of money. Not much of a bargain in my book. (Individual, Missoula, MT - #A5.12120)

864. Public Concern: The Forest Service should manage National Forest System lands for a wide variety of uses.

I would say the highest good is the public usage of the land—that means recreation, the national economy and the local businesses. I do not believe using it solely for timber production is correct, but neither is using it solely as a wildlife preserve (for wolves, grizzlies, or owls), nor as a botany preserve (for the old growth), nor as a nostalgic attempt to recreate the west as it was before the white man arrived (or for that matter, before the Indians arrived—after all, they did burn the forest regularly and they did leave a mark on this Eden as some seem to think primitive America was). (Individual, Bozeman, MT - #A59.50200)

BECAUSE TAXPAYERS HAVE A RIGHT TO USE PUBLIC LAND

The world is made up of opinions, some of these get more attention due to the size of their budget not by their educated fairness! Too many people throw money at organizations which benefit nothing. The Earth is a fragile, yet not so fragile thing, it has survived many years of changes, many of which our species would not have survived. With that in mind, this land is here to use and use for all. The consideration needs to be given so that the people that fund this land (taxpayers) have rights within these lands. (Individual, No Address - #A426.15100)

These are public lands. Each taxpayer's tax payments bought and maintains these lands. They are not owned by the Forest Service. They should be enjoyed by all. The Forest Service are employees of the public and need to respect our wishes on how to both protect wildlife and utilize these assets. (Individual, No Address - #A457.15110)

865. Public Concern: The Forest Service should assure consistent decisionmaking for all national forests.

BECAUSE THEY ARE ALL A PART OF THE NATIONAL FOREST SYSTEM

In exercising our stewardship over these forest resources and as supported by the many commenting interests representing all states, we should have a consistent basic regulation for all the national forests. It should not be easier to timber a national forest in Montana than one in Colorado or New York. Those living near a national forest in one state should be entitled to have it protected just as much as those living near another forest in another state. It is only fair and equitable that there should be a "level playing field" so that there will not be any discrimination among the forests. After all, they are all in the same national forest system. (Organization, Birmingham, AL - #A21582.13100)

866. Public Concern: The Forest Service should use the Sierra Nevada Framework policy as a model for management of the entire public lands system.

UNTIL ACTIVE MANAGEMENT IS PROHIBITED

Again, all of the so called "threats" to our forests have been used as a smoke screen to promote more logging. Why don't you admit it—government studies have shown logging is the number one activity which increases wildfire danger? Let's talk about hazardous fuels. What about the thousands of gallons of diesel fuel and atrazine that's regularly applied to clearcut land throughout the west. Sure that's on private lands, but what we're dealing with is this same mentality. If it can be mined, logged, grazed, roaded, or destroyed [then] it must be? The USFS actually has done something positive in the last 100 years, it's called the Sierra Nevada Framework. This policy should not be undermined as we know is in the works, it should be the model for the entire public lands system. At least until we finally wake up and stop all commercial exploitation of our national forests and public lands. (Organization, Santa Cruz, CA - #A29160.30100)

867. Public Concern: The Forest Service should adopt a management approach similar to that used to delineate and manage wetlands.

The Forest Service must adopt an approach similar to that used to delineate and manage wetlands of the United States. The Forest Service must start with clear and up-to-date criteria for the delineation of roadless areas. These criteria should include forest health, wildlife habitat, water quality, scenic values, access to non-federal land, and a variety of recreation opportunities. Once established, these criteria must be applied consistently to all forested lands while balancing the economic and social relationships that directly impact working families and local communities. (Individual, Hibbing, MN - #A21366.13200)

868. Public Concern: The Forest Service should employ a new "wilderness ethic."

BY EMPHASIZING A LIGHT RESTORATIVE APPROACH TO SUSTAINABLE MANAGEMENT BASED ON INDIGENOUS PRACTICES

It is time that Americans let go of the Daniel Boone/Davy Crockett/Boy Scout approach of believing our American forest resources are limitless and our divine right to use and abuse. Our "wilderness" ethic needs to be replaced with a new "wilderness ethic" of a light restorative approach to sustainable management based on Return to the Natives (indigenous ways combined with modern science and technology in a 'light restorative approach using the proper balance of native species and educated human use and appreciation of these areas). (Individual, Watsonville, CA - #A6767.30100)

The Indigenous Americans harvested forest resources and used controlled burns in a sustainable way for thousands of years and created balance with a light human touch. I truly believe that their ancestral history, knowledge and culture can provide "light touch" integrated approach (scientific observation, soft engineering/technology, restorative use, art and spiritual connectivity to the land and lifeblood waters) to management of our national forests. By returning to the Natives (our indigenous cultures and our own ancestral roots) and using native plants and animals in restoration management, we can empower and employ indigenous people and have a sustainable American landscape that President Bush and future Administrations can be proud of and set a world leadership example, so that developing nations do not repeat our same mistakes. (Individual, Watsonville, CA - #A6767.15162)

869. Public Concern: The Forest Service should be flexible in its management.

TO REFLECT CHANGING NEEDS

The history of the national forests clearly shows continuing change in economic and social needs, objectives, and opportunities, which calls for continuing flexibility in management. There is no reason to

think that we can better predict the future now than we did in times past. (Individual, Olympia, WA - #A811.15100)

870. Public Concern: The Forest Service should afford local citizens the opportunity to carry out land management activities.

BY ALLOWING THEM TO HELP WITH CONTROLLED BURNS AND SALVAGE OPERATIONS

Controlled burns are a good tool, but only along with free and easy access by caring people. After the fire in Los Alamos in the mid 70s that almost got the labs, the areas opened up to the population for gathering (before rot and insects got in) and there was a wonderful community experience involved and clearing the area of burnt but not destroyed trees. Why did we not do this again. It suggests that we have "Dogs in the Manger" behavior that needs to be stopped. Controlled burns need to be controlled by people with deep intuitive, spiritual, scientific and training in weather, forest behavior, etc. This is where you could have people of exceptional love for the forest caring for it. Not managers and people who just have a job to do. This is so much more important than that! (Individual, No Address - #A5360.30200)

BY ALLOWING CAREFULLY MANAGED PERSONAL USE TIMBER AND FIREWOOD REMOVAL

My belief is that, as now, we have to pay $10 per cord to go into the forest to collect firewood, for instance. The collector can drive up to the biggest pinon tree he sees, stand in front of it and cut it off over two feet from the ground and fell this glorious tree right next to a road. Then the limbs are hacked off, the green tree is cut into big splitable lengths and loaded into the truck, leaving the limbs right there and also the garbage and the bad attitude towards the forest. It is not unusual for me to go up there and have to clean up this spiritual assault, aesthetic assault and very uncool behavior. The people with the permit are not distinguished as to whether they are commercial or not and the forest is not cared for. Let the little guy go in there and be in there with some guidelines that encourage him to take the burden out, not just the big hunks. Then make is easier for him to take that wood home and build something out of it, to use it, to heat his home with it, etc. When we begin this process of everyone tending the forest and not feeling like it is private property, then we make progress. The roads are only bad because of the type of roads we want to avoid. Don't make it so that no roads exist in an area that needs to be tended, and accessed by careful, deliberate, environmentally concerned citizens and caretakers. (Individual, No Address - #A5360.30200)

871. Public Concern: The Forest Service should enter into non-traditional forms of management agreements.

TO BENEFIT LOCAL ECONOMIES AND FOREST HEALTH

The USFS should enter into non-traditional forms of management agreements. For example, a community manages a forest area in agreement with the USFS; a preservation group pays for the privilege to manage a wilderness area; a forest products company manages a portion of forest land in cooperation with the USFS; the respective state forest departments manage portions of the National Forest, etc. We need more joint ventures based on sound business principles and active stewardship management of the forest resource to create a wealth in the local economies while building a healthy forest environment. We must have both man and forest benefiting. (Individual, Libby, MT - #A10531.15100)

872. Public Concern: The Forest Service should support the Generational Land Stewards.

The best way to protect what you term "roadless values" is to not interrupt the Generational Land Stewards from their good works in maintaining that critical standard of diversity of tangible commodities and societal values. Keeping Generational Land Stewards, would also be economically prudent; for to seek out, train, tool up and pay new folks, to attempt doing what a GLS now does for free, would be a huge waste of our dollars! If you have a desire to preserve something really precious, and of real value, I urge you to preserve the Generational Land Stewards! (Individual, La Salle, CO - #A1103.70000)

873. Public Concern: The Forest Service should pursue tree-planting restoration projects in old neighborhoods.

When will we start using common sense with Mother Nature? We strip wooded areas to develop neighborhoods and leave old neighborhoods in shambles. Why don't we clear some of these old places and replant trees? (Individual, San Antonio, TX - #A1185.70110)

874. Public Concern: The Forest Service should consolidate national forests.

SO THAT AREAS OF SIMILAR ECONOMIC, SOCIAL, GEOGRAPHIC, AND VEGETATIVE SYSTEMS ARE ADMINISTERED TOGETHER

Consolidate national forests so that areas of similar economic, social, geography and vegetative systems are administered by one National Forest headquarters. (Individual, No Address - #A26264.13200)

875. Public Concern: The Forest Service should either actively manage public lands or relinquish its authority.

We are disappointed with what we see as an attempt by the USFS to refrain from managing our forests through the increasing creation of land designations that minimize or eliminate management. Perhaps we no longer need a USFS. Our local police could accomplish the goal toward which the USFS is working: lock it up and keep people out. (Individual, Cedaredge, CO - #A10364.12120)

876. Public Concern: The Forest Service should consider privatization of public lands.

Privatization of land is key. It results in stewardship and effective management. (Individual, Saint Paul, MN - #A11544.12000)

AUCTION TO THE HIGHEST BIDDER

I am opposed to the federal government building roads for private industry to exploit national natural resources, such as forests, mineral deposits, and oil reserves. Why not just liquidate the forest (or other inventory) that the government doesn't want to maintain, by selling it to the highest bidder. Let the winner of the bid build, maintain, and upgrade the roads as they see fit?. Then they will have to maintain their own property, and the government can tax them on it! (Individual, West Lebanon, NH - #A3812.15122)

Adequacy of Analysis

Summary

Some respondents assert that the Forest Service did not fully analyze the consequences of the Roadless Area Conservation Rule, and make specific suggestions for additional analysis needed during the current review process. Respondents state that forest health risks associated with eliminating commercial timber removal were not adequately considered. A similar assertion is echoed by others, who assert that the Rule deprives managers of tools that may be appropriate to improve forest health or function in specific places. These respondents state that analysis should be conducted for each roadless area to determine the best management approach. Others suggest that a regional-level analysis is the proper scale on which to evaluate roadless areas. Several respondents believe that potential increases in agency costs for firefighting were not properly evaluated.

877. Public Concern: The Forest Service should analyze the risks of eliminating timber removal and roading as management tools in roadless areas.

It is essential that roadless areas be accurately mapped, including those areas at risk of wildfire and insects and disease so that management options can be accurately assessed. In our opinion, the draft environmental impact statement for the previous rule did not adequately address wildfire risk. **(It is imperative that the Forest Service require that the risks and impacts of "doing nothing" be provided as well as an analysis of the risks or impact of roading or other management activities. In the final decision, the standards for no management on federal forest lands should be as any standard for management activities.)** (Association, Fernandina Beach, FL - #A15466.10135)

878. Public Concern: The Forest Service should compare the value of management activities versus the value of leaving areas roadless.

BY USING THE "CHOOSING BY ADVANTAGES" METHOD

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

First and foremost is a definition of what is worth saving through management and what is classified as worthless and should be left to nature. Roadless areas have little social and economic value to the nation unless they are open to all the nation to use. Preservation is such a false word when defining these lands taken out of production. Preserving what for whom? Again, if you decide that this public land has no value, then keep it roadless. If it has value and is worth saving, then take it out of the roadless areas and manage if for multiple use!!!! (Individual, Montrose, CO - #A370.45100)

Roadless Areas are a conglomerate of lands designated TO NOT BE ROADED. They are not intended, nor for the most part fit in the Wilderness classification. Each Roadless Area needs local review to consider their value and reclassification (in partials) as to those values. When this is done appropriately some areas (within each) may fold out as Wilderness, other areas may prove roadable. From our window, a majority of these areas would remain under Roadless status, but certainly be available for some economical logging. (Individual, Forks, WA - #A877.45100)

Any description of values should attempt to balance characteristics that are enhanced by maintaining an area in a roadless state against: (1) the values that could be achieved through active management, and (2) the risks associated with maintenance of the area in a roadless state. There are any number of instances where construction of a road through a roadless area would result in a net gain to the environment.

For example, if an existing road is located in a sensitive riparian zone, it may be beneficial to relocate such a road to a ridgeline, even if the ridgeline is within the boundaries of an inventoried roadless area. Or, there may be instances where the risk of catastrophic wildfire is high enough that the benefits to be derived from construction of roads necessary to reduce the fuel load and restore the stand to historic conditions will outweigh any impacts caused by road construction. (Governor, State of Idaho - #A20141.45000)

ON A ROADLESS AREA-BY-ROADLESS AREA BASIS

We believe public input will identify the important values to be considered when evaluating inventoried roadless areas. Those values are too numerous to list here, but run the gamut from do-nothing to intensive management. The important point is those values will vary from forest to forest and between roadless areas within the same forest. The Forests need only listen closely to the various interests to see what those values are, and keep an open mind by not eliminating those values the Forest does not agree with. WE believe the end result will be that some roadless areas will remain roadless and others will be developed. This analysis must be done on a specific roadless area by roadless area basis, not a top-down, government-knows-best basis. (Elected Official, Saint Anthony ID - #A4942.45100)

879. Public Concern: The Forest Service should use large scale analysis to provide guidelines in establishing the role of national forests.

Large scale analysis (such as the ICBEMP), national and regional strategic plans, or a revitalized RPA are appropriate to establish the National Forests' role in providing commodity and non-commodity goods and services. This is valuable input to the individual National Forest planning process; however, these broad scale analysis and/or strategies should never be direction, only guidelines. (Individual, Colfax, WA - #A5421.16000)

880. Public Concern: The Forest Service should evaluate the impacts of land management decisions with respect to impacts on other public lands in the area.

Opinions from all concerned individuals and affected government agencies should be solicited and considered in land management decisions, and the consideration of impact should not be limited to the land parcels under review. The impact of land management decisions on any section of Forest Service land must be evaluated with respect to the impact on other public lands in the area. The potential negative impact from overuse of other public lands, especially other USFS and NPS lands, should always be considered before placing additional restrictions on access to public lands in the national forests. (Individual, Crystal River, FL - #A6257.12300)

881. Public Concern: The Forest Service should consider that reduced road access would increase costs of forest management.

The costs of fighting wild fires are higher where no roads are available to move men and equipment closer to battle the blazes. (Individual, Rogue River, OR - #A4802.17000)

Areas designated as "roadless" in terms in government expenditure can not be managed for fire and disease except at very high cost, which cost may include the safety of firefighters or the sustainability of growth. If for no other reasons, this proposal should be dropped. (Individual, Salt Lake City, UT - #A806.17100)

Roadless Areas Management General

Summary

General Comments – Some respondents question the terminology used to distinguish between types of roadless areas, and request that the Forest Service better explain the term "uninventoried." Some assert that this means that these areas have not been evaluated at all, in which case the rationale for including management direction for them in the final rule is illogical.

Among others, a common refrain is that the current review of the Rule is the result of political interference from the new Administration. These respondents specifically ask the Forest Service to base its decisions about the fate of the Rule on science rather than political expediency. Thers are people who assert that the last Administration was bowing to political pressure in formulating the rule in the first place and say the current review process is appropriate. (See also Chapter 3: Informed Decisionmaking (Question 1): Decisionmaking Authority: *Trust and Integrity*, as well as the discussion of trust and integrity in the Executive Summary.)

Authority for Roadless Area Management – A number of respondents question whether or not the Forest Service has statutory authority to manage roadless areas as such under a national rule. These people assert that the Wilderness Act makes no provision for such a de facto wilderness category (see also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Wilderness Acts*, and Chapter 5: Designating Areas (Question 8): Wilderness

Recommendations). Others state that a separate roadless management strategy creates illegal buffer zones around wilderness areas. Some respondents maintain that the Forest Service does have the statutory authority to manage roadless areas to maintain their unroaded character. Some respondents request that as the public debate continues over roadless area management, Congress be left out of the fray to avoid further politicization.

General Direction of Roadless Area Management – Citing the prohibition on most timber removal in the Roadless Area Conservation Rule, some respondents ask the Forest Service to cancel all existing timber sale contracts in inventoried roadless areas. There are others who believe that by focusing on road-related issues and prohibiting roadbuilding, the Agency is implicitly rejecting active forest management activities in roadless areas, which may ultimately prove detrimental to forest health. (See also Chapter 6: Protecting Forests (Question 3).)

882. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule without political interference.

Citizens have overwhelmingly spoken our wish to keep our roadless areas roadless. Implementation should be the responsibility of professional foresters, acting without the political interference that has characterized this issue from the beginning. (Individual, Lolo, MT - #A111.10160)

I very much hope that you will let stand the Roadless policy it was written in the January 2001 Record of Decision. I hope you will realize that the previous decision itself is a compromise, far from a radical policy. Please do not cave in to political pressures to further develop the current roadless areas. (Individual, Lansdale, PA - #A611.10160)

BASE MANAGEMENT DECISIONS ONLY ON SCIENCE

The advent of the George W. Bush administration, with its generally anti-regulatory stance, may indeed be giving the Forest Service some second thoughts about how strong the proposed regulations should be, but science should decide this issue. The recommendations are based on years of thorough study. Court actions by resource extraction corporations are meant only to weaken the protection to public property that is offered by the Rule. This is the reason that our group will tolerate no exemptions or exclusions created to undermine or weaken the Roadless Area Conservation Rule. (Individual, Chico, CA - #A915.10150)

883. Public Concern: The Forest Service should explain why there are provisions for managing uninventoried roadless areas.

BECAUSE IF AREAS ARE UNINVENTORIED, GROUND CONDITIONS AND NEEDED MANAGEMENT IS UNKNOWN

Why is there a provision for managing “uninventoried roadless areas”? If it is in fact “uninventoried,” then the actual on-the-ground conditions are an unknown and therefore the type of management is also an unknown. Yet under the guidelines there is a broad definition of provision to manage these areas. (Organization, Orofino, ID - #A8393.45420)

Authority for Roadless Area Management

884. Public Concern: The Forest Service should consider that there is no statutory direction for managing areas as roadless.

The roadless issue started with the Wilderness Act in 1964. The intent of Congress in requesting the inventory is clearly spelled out in Sec. 3(b) of the Act. The values and characteristics to be considered are well defined in Sec. 2(c) of the act. These values have already been well defined by RARE I, RARE II and subsequent Forest Plans. It was the intent of Congress for the inventory to provide recommendations for Wilderness classification by Congress. There is no statutory direction for the

Forest Service to manage areas as roadless. It was not the intent of Congress as expressed in the 1964 act for the inventory to establish special classified areas without management direction. (Individual, Moscow, ID - #A5380.20206)

"Areas without roads have inherent values and characteristics that are becoming scarce in an increasingly developed landscape. While National Forest System inventoried roadless areas represent only about 2 percent of the total landbase of the United States, they provide significant opportunities for dispersed recreation, clean, clear sources of public drinking water, and large undisturbed landscapes that provide privacy and seclusion. In addition, these areas serve as bulwarks against the spread of invasive species and often provide important habitat for rare plant and animal species, support the diversity of native species, and provide opportunities for monitoring and research." (Forest Service Roadless Web Page, Questions and Answers 2000).

Given such statements, it is difficult to discern how the protected roadless areas created by the January 12 rule would differ in any significant manner from wilderness areas established under the Wilderness Act of 1964. The Forest Service must respect the fact that the overwhelming majority of the roadless areas that are the subject of the ANPR and the January 12 rule were expressly rejected by Congress for Wilderness designation during consideration and passage of 19 separate pieces of legislation. In fact, virtually all areas targeted by this proposed action were specifically left open to mineral location under the Mining Law of 1872, leasing under the Mineral Leasing Act of 1920, mineral material sales, as well as for other multiple-uses, when Congress decided against wilderness designations for these areas pursuant to the Wilderness Act of 1964. Thus, "wilderness values" cannot be applied wholesale and without specific authorization from Congress. (Association, Spokane, WA - #A17351.25100)

BECAUSE IT IS PROHIBITED BY LAW FROM CREATING BUFFER ZONES AROUND WILDERNESS

In pursuing the ANPR process, the Forest Service must understand that a "national roadless rule" is unnecessary (and probably unlawful) given the existence of the Wilderness Act of 1964. Congress passed the Wilderness Act to establish a National Wilderness Preservation System because several decades of management of the public lands by administrative agencies through designation as "roadless," "primitive," "canoe," "wild," or "wilderness" areas, resulted in a patchwork administrative scheme for setting aside "wilderness areas" for special protection from multiple-uses. As the House Report accompanying the Act explained:

"A statutory framework for the preservation of wilderness would permit long-range planning and assure that no future administrator could arbitrarily or capriciously either abolish wilderness areas that should be retained or *make wholesale designations of additional areas in which use would be limited.* This committee accordingly endorses the concept of a legislatively authorized wilderness preservation system." House Report (Interior and Insular Affairs Committee) No. 15338, July 2, 1964, at 3616-17 (emphasis added). . . . Through its express decision not to create buffer zones and instead limiting the special protection for wilderness areas to that area within carefully drawn boundaries, Congress made clear that the remaining lands not designated wilderness were to remain open to multiple uses. (Association, Spokane, WA - #A17351.25100)

The Forest Service traditionally has respected congressional will in regard to management of non-wilderness areas. For example, the Forest Service Manual on Recreation, Wilderness, and Related Resource Management explicitly forbids the maintenance of "buffer strips of undeveloped wildland to provide an informal extension of wilderness." FSM 2320.3(5). The Forest Service must refrain from attempting to create the functional equivalent of congressionally designated wilderness areas in this roadless proposal. In the rulemaking process leading up to the January 12 rule, the Forest Service failed to do this by implicitly incorporating "wilderness values" to create unlawful buffer zones by informally extending congressionally authorized Wilderness Areas. (Association, Spokane, WA - #A17351.25100)

The process of creating "roadless" areas should not be used as an administrative method to circumvent issues with which Congress has dealt but may not have resolved. Congress created the Wilderness Act of 1964 to preserve areas of the country with unique value from man's impact. Since the date 106 million acres of lands in the U.S. have been designated as "wilderness" by numerous acts of Congress. Congress

did not see fit to create "protected border areas" around or adjacent to the wilderness. The "roadless area conservation" program should not be used to create additional "protected" areas in addition to existing "wilderness areas". Only Congress should exercise such authority where it deems necessary. (Association, Novato, CA - #A17652.25100)

885. Public Concern: The Forest Service should clarify that there is statutory direction for managing areas as roadless.

THROUGH THE FOREST PLANNING PROCESS

By law, national forest plans have to evaluate the wilderness potential of roadless areas and make wilderness recommendations to Congress. The Rule would not change that. Regardless of recommendations for wilderness, National Forest plans can also designate roadless areas for continued management as roadless areas. (Individual, Fort Thomas, KY - #A11699.25000)

886. Public Concern: The Forest Service should not involve Congress in management of roadless areas.

BECAUSE INVOLVING CONGRESS POLITICIZES MANAGEMENT

Based on what I know now, I would avoid the Congress in any way possible. Going to Congress will only serve to remove the management from professionals and make it political. (Individual, Hudsonville, MI - #A4928.25000)

BECAUSE CONGRESS IS UNABLE TO IDENTIFY WITH THOSE MOST AFFECTED BY ROADLESS DESIGNATIONS

Local forests should be empowered to close any sections of forest they deem fragile if overuse or abuse occurs. Congress should not be involved in "roadless" areas at all . . . they are unable to experience or interact with the people who are directly affected by such mindless designations as "roadless." Remember, these forests are maintained by taxes. (Individual, Three Forks, MT - #A697.25120)

General Direction of Roadless Area Management

887. Public Concern: The Forest Service should immediately cancel all planned active management projects in roadless areas.

American Lands is not confident that these areas will be adequately protected by the Chief's July directive or through the forest planning process. Nor is it likely that Congress will pass legislation in the very near future to protect all roadless areas as wilderness. With that in mind, the Forest Service should immediately protect all remaining roadless areas under its final rule. All development projects, including timber sales, off road vehicle trails, oil and gas drilling, and other schemes should be immediately cancelled. (Organization, Nevada City, CA - #A4941.25120)

888. Public Concern: The Forest Service should consider that forest management activities can take place in roadless areas while still preserving roadless area characteristics and values.

Oil and gas can be extracted from a roadless area in a pipeline and still keep the roadless character of the area if that was determined to be worth the cost. On the forest health side we feel very strongly that we keep the ability to carry out active management and then do just that. If keeping the roadless character of the area is an important value then we certainly have the equipment, expertise, and history to carry out tree removal from roadless areas. Throughout the West helicopters have been used to remove dead and dying trees from roadless areas for 40 years. Almost all of these areas are still roadless, but they are in much better shape than if nothing had been done. The Silver complex fire in Southern Oregon, the Foothills fire in Southern Idaho, and the hundreds of thousands of acres of mountain pine beetle salvage in the California Sierras are prime examples. And the beauty of how this was done is that great social and economic values were realized by doing the right thing for the environment. Today and under

Clinton/Gore rules none of this would be possible and we are a poorer people because of it. So we suggest the USFS go back to true multiple use where environmental, social, and economic values are all considered. We have been stuck on exclusively environmental values for so long we are about to destroy what we all would like to see remain for future generations. (Business, Portland, OR - #A10558.45100)

Roadless areas should not be automatically perceived as a "special place" or even a place with out roads. A major concern is that there is a perception that areas without roads are by definition, wild or wilderness and thus, should not be managed at all. The facts are that many of the inventoried roadless areas actually have roads in them. By focusing solely on the issues of roads or lack of thereof, we are missing the opportunity to consider the potential values of an area that the public may want such as healthy forests and wildlife habitat. These values are attainable through specific activities (management). Determining values desired, therefore becomes important. What is it, exactly that the public wants? It may not be areas totally off limits, but rather areas that provide primitive recreation, semi-primitive recreation, wildlife attributes and healthy forests. Local forest planning can best help to describe the values desired and the activities, which can be used to achieve such values within a specific area. (Association, Atlanta, GA - #A17805.45100)

The ecological, physical, and biological attributes present in a particular place best define the values of the national forests. Roads, trails, or other improvements can improve or maintain these values. In many cases, these facilities are necessary if the values are to persist over time, such as in the case of maintaining certain wildlife habitat or access to reduce hazardous fuels. In addition, many of the inventoried roadless areas are not roadless. They have roads, water developments, transmission lines, and in some cases have been previously agricultural land. (Association, No Address - #A22978.45100)

889. Public Concern: The Forest Service should use the Black Hills National Forest as a model for managing roadless areas.

I call your attention to the fine job your agency has done for the last 100 years in the Black Hills National Forest as proof that roads, logging, recreation, wildlife etc. are compatible. Since the first ever U.S.F.S. timber sale there in 1899 when the inventory was 1.5 billion board feet there have been 5 billion board feet harvested and over 5 billion board feet are still standing. An article in the January 2000 Journal Of Forestry reports the forest "now also supporting increased recreation, wildlife, water and other uses". I have heard of no catastrophic fires on this forest. I challenge you to use this as a model for planning the future of the "roadless areas." (Individual, Springfield, OR - #A21815.30520)

890. Public Concern: The Forest Service should not manage roadless areas as if it were the National Park Service.

The courts have separated the sustained yield and multiple-use mandate of national forests from other Congressional mandates, such as national park management, and have clearly distinguished national forests as being not wholly dedicated to recreational and environmental values. The roadless rule contemplates management akin to that of the National Park Service and has been created from a political basis, rather than by Congressional mandate or, more importantly, scientific necessity. (Professional Society, Anchorage, AK - #A21707.10130)

891. Public Concern: The Forest Service should turn protection of roadless areas over to the U.S. Department of the Interior.

I would even ask you to take this action one step further and turn these areas over to the protection of the Interior Department and someday make these areas a "National Wilderness" similar in concept to our National Parks which are so heavily overburdened at this point. (Individual, Estes Park, CO - #A3970.25200)

Activities (Question 7)

Question 7: Describing Activities. Are there specific activities that should be expressly prohibited or expressly allowed for inventoried roadless areas through Forest Plan revisions or amendments?

This section includes 24 subsections: Activities General; Travel Management General; Road/Trail Construction; Road/Trail/Maintenance/Reconstruction; Road/Trail Closure/Obliteration/Restoration; Natural Resources General; Timber Harvest; Mining, Oil, and Gas Development; Grazing; Utilities; Other Natural Resource Concerns; Recreation General; Motorized Recreation; Motorized Recreation – Off-Road Vehicles; Motorized Recreation – Snowmobiles; Non-Motorized Recreation; Mechanized Recreation; Ski Area Development; Hunting and Fishing; Outfitter-Guides; Equestrian Use; Camping/Shelters/Accommodations/etc.; Special Use Permits; and Other Recreation Concerns.

Activities General

Summary

General Comments – Respondents suggest that the Forest Service manage activities on National Forest System lands by seeking public input regarding which activities should be allowed or prohibited. Other suggestions include using the National Environmental Policy Act process, using existing individual forest plans, and using the Roadless Area Conservation Rule to govern activities in the national forests.

Adequacy of Analysis – One respondent recommends specific readings for the Forest Service to research in directing resource management: *Travel Management, Bringing People and Places Together* and *The Outdoor Recreation in American Life, A National Assessment of Demand and Supply Trends*.

Activities – A number of respondents comment on what activities they say should or should not be allowed in roadless areas. Comment on specific activities are included in the sections to follow. People comment, in general, that the same activities should be permitted in roadless areas that are currently permitted in other areas of National Forest System lands, at least to the extent that current forest management plans allow. Others say the Forest Service should allow currently permitted activities in roadless areas to continue. Some state that a wide variety of activities should be allowed—in designated areas, according to the condition and features of the land, and unless the activities in question are causing environmental damage. Other respondents list a wide array of activities they say should be prohibited or restricted in roadless areas—activities that are harmful to the environment or that present a liability concern, activities that require roads, and activities that cause excessive noise.

Activity Management General

892. Public Concern: The Forest Service should seek public input regarding activities that should be allowed or prohibited.

The public will identify the activities that should, or should not, occur in roadless areas. Some roadless areas should allow timber harvest and motorized use and others should not. There will not be agreement on all, or possibly any, activities that may occur in a particular roadless area. The agency's job is to provide a fair and balanced apportionment of activities among the different roadless areas on the forest, not an all-one-way approach as the Wasatch-Cache proposes. In other words, some roadless areas will become roaded with a variety of activities consistent with that form of management, while other roadless areas will remain without roads and with activities appropriate for that kind of management. Look to the various publics for input on where those uses should occur and then use common sense to provide some balance of those uses on the forest. (Elected Official, Saint Anthony, ID - #A4942.90000)

893. Public Concern: The Forest Service should govern activities through the National Environmental Policy Act process.

OHV use, mining, grazing, and other special uses should be managed through the normal NEPA process. (Organization, Placerville, CA - #A22653.90000)

894. Public Concern: The Forest Service should allow existing individual forest plans to govern activities in roadless areas.

UNTIL THESE PLANS HAVE BEEN AMENDED OR REVISED

Specific activities, prohibited or allowed, can only be determined after the determination is made on what the future management will be for the roadless area. This determination has already been made in the existing Forest Plans and this implementation should continue until that planning is amended or revised. Under the existing Forest Plans, roadless area management direction is given, including specific activities that are allowed or prohibited. We cannot see any reason to change this current direction until these plans have been amended or revised under the current NFMA regulations or under the revised NFMA regulations. (Business, Colville, WA - #A3362.90000)

895. Public Concern: The Forest Service should use the Roadless Area Conservation Rule to govern which activities should be permitted.

Describing Activities—The current rule covers this very well and should not be changed. (Individual, Peck, ID - #A1109.90000)

Now, the Bush Administration is moving to stop the rule and its protections. They have asked for public comments regarding their intention to weaken the rule, so harmful activities, such as logging and new coal, gas, oil and other mineral development, could proceed in roadless areas that were protected by the January rule. (Individual, Austin, TX - #A1125.90000)

The rule represents a balanced approach to forest conservation, saving the last 30% of America's wild national forests from logging, mining, and drilling—activities already allowed on most national forest lands. As written, it also adequately addresses issues of fire management, forest health, access, and local input. (Individual, John Day, OR - #A1126.90000)

896. Public Concern: The Forest Service should consider the current and historic uses of roadless areas.

When evaluating Roadless Areas, the Forest Service should consider:

The current and historic uses of the area (is the area used for canoeing, hiking, camping, cross-country skiing, OHV use, etc.). (Individual, Des Moines, IA - #A12587.45500)

Traditional use should score highest in evaluation. (Individual, No address - #A57.70200)

The description of values needs improvement

Land use history should be noted. Some "roadless" areas have roads, some were logged or farmed during the last 200 years, and some have been developed during the last 30 years. Land use history needs to be documented. Roadless is more of a historical designation than an ecological designation. (Individual, No Address - #A17292.45000)

Local planning should use historic usage (past 100 years) as the baseline. . . . If the forest has not been significantly damaged over the past century, the forest should be deemed robust enough to allow the current usage patterns to continue. (Individual, Tustin, CA - #A20777.30110)

897. Public Concern: The Forest Service should base land management activities on several established systems.

RECREATION OPPORTUNITY SPECTRUM, VISUAL QUALITY OBJECTIVES, AND THE ECOLOGICAL CAPACITY OF THE LAND

Land management activities should be based on established systems: Recreation Opportunity Spectrum, Visual Quality Objectives, and the ecological capacity of the land. (Individual, No Address - #A17292.90000)

Adequacy of Analysis

898. Public Concern: The Forest Service should research references about management of resources and public uses.

TRAVEL MANAGEMENT BRINGING PEOPLE AND PLACES TOGETHER* AND *THE OUTDOOR RECREATION IN AMERICAN LIFE, A NATIONAL ASSESSMENT OF DEMAND AND SUPPLY TRENDS

To some degree many of these issues/concerns have been discussed in the past, albeit, with the nuances of nomenclature being used to set the tone in addressing ongoing and future direction of resource management and meeting the needs of the public. Two significant examples of reference recommended for your research are: TRAVEL MANAGEMENT BRINGING PEOPLE AND PLACES TOGETHER, Report of the National Access and Travel Management Strategy Team January, 1992; and the Outdoor Recreation in American Life, A National Assessment of Demand and Supply Trends. (Individual, Evansville, IN - #A19627.90000)

Allow Activities

899. Public Concern: The Forest Service should permit a variety of activities in roadless areas.

Any activities should be permitted in the area that are not specifically prohibited in the document establishing the roadless areas. (Individual, Olympia, WA - #A278.90000)

We support the changes that reduce restrictions on the forests. We would like to see plans that allow more heliskiing, snowmobiling, cross country skiing, and other activities in the same areas. Obviously some areas should be restricted from motorized vehicles but common sense must prevail. (Individual, No Address - #A733.90000)

For all inventoried roadless areas, forest plan revisions or amendments should consider a full range of management alternatives, from active management to wilderness recommendations. If the decision for an areas is to remain roadless, permitted activities should include forest health treatments, watershed

improvement activities, motorized and non-motorized recreation, wildfire suppression, insect and disease treatments, and some improvements not requiring permanent road access. (Association, Concord, NH - #A1050.90000)

IN DESIGNATED AREAS

All activities should be allowed at some location. This does not mean that ALL activities should be allowed at ALL locations. Smart land management will need to be applied to make the designations. Unique natural beauty sites such as vistas or waterfalls should not be logged and, at the same time, highly productive timber sites should be logged. When there is a conflict over the same site, then some knowledgeable decisions will need to be made and not just blanket designations. Knowledgeable managers are going to have to have some backbone and stick to their decisions. This has not been the case in the past. (Individual, Corvallis, OR - #A1132.90000)

In Southern Oregon, access to BLM and Forest Service lands range from multiple use roads and trails, to areas exclusive to OHV use, to the famous Pacific Crest Trail (hikers-only). This approach has worked very well. As you develop policies in this area, I ask that you would keep all interests in mind. Many OHV enthusiasts are responsible with the outdoors (myself included), and it would be a shame to outright ban this kind of access. For example, my ability to enjoy the outdoors is often limited by my work schedule; my half-day motorcycle rides into the backcountry allow me to enjoy absolutely beautiful landscapes that may take 1-2 days of hiking. This is a precious privilege to me! (Individual, Talent, OR - #A1160.90000)

The full array of recreation opportunities needs to be provided for through differing levels of roads, trails, uses managed for etc. It was apparent under past management trends the NF would be largely made up of areas designated as wilderness and areas consisting of roads and cutover forests. The great challenge and opportunity is to maintain areas in between these 2 extremes. More acres without roads (acres that will continue to be without roads), where non-wilderness types of recreation activities can take place are needed. Uses such as mountain biking, hiking, motorcycling, ATVing, etc should be provided for in settings other than roaded timber producing areas. Describing this in terms of the Recreation Opportunity Spectrum (ROS), more areas of SPNM and SPM need to be protected and managed as such for the long tern. The ROS designations need to be allocated in Forest Plans rather than being simply an inventory of current conditions. Designation of the majority of remaining roadless will provide a proper mix of ROS designations on NFs. (Individual, No Address - #A1702.90000)

IN AREAS APROPRIATE TO THE ACTIVITIES

In general, there shouldn't be any overall forbidden activities, but certainly some limitations based on locale may be appropriate. For example, if an area has dangerous cliffs, then permitting rock-climbing might be reasonable, but having hiking trails or snowmobile trails might pose a threat to human safety. Horses and ORV's should not use areas where there is sandy subsoil in steeply sloping terrain, which might cause undue erosion. Camping or campfires shouldn't be permitted during an especially dry or windy season of the year. Common sense should be the best guide in this part of planning. (Individual, Nashville, TN - #A874.90000)

UNLESS THE ACTIVITIES ARE DAMAGING AN AREA

There should be no activity out right banned unless it is illegal. I love to sing, you may not like my voice, should I be banned form singing? All activities can usually be allowed if properly managed. Each activity should be fairly evaluated and all attempts should be made to manage each activity with proper design and maintenance. If an acceptable result is not achieved, activity should be stopped and re-evaluated for a reasonable amount of time (6 months or so). Experts should be consulted and advice sought. (Individual, No Address - #A57.90000)

Growth in consumption and population make it inevitable that humankind will increasingly face limits with regard to material uses of natural resources and manipulation of ecosystems, so strong preference should be placed on human desires and activities that minimize our per capita ecological footprint on

wild lands. On all public lands, but especially in remaining roadless areas, ecological footprint analysis should be used to determine which activities have the least environmental impact and most social benefits, with market economic benefits placed secondary to water quality, air quality, wildlife habitat and high quality human powered recreation experiences. (Individual, Corvallis, OR - #A650.90000)

There are no activities that should be prohibited unless that activity can be proven to cause MAJOR damage. (Individual, Mount Hood Parkdale, OR - #A1084.90000)

900. Public Concern: The Forest Service should not exempt activities listed in a Schedule of Proposed Actions.

All Projects Must be Reevaluated. Exempting work that is "listed in a schedule of proposed actions" is unacceptable and undermines the policy's intent. (Organization, Arcata, CA - #A1778.45620)

901. Public Concern: The Forest Service should permit the same activities in roadless areas that are currently allowed in other areas of National Forest System lands.

TO THE EXTENT THAT CURRENT FOREST MANAGEMENT PLANS ALLOW

"Roadless" areas should be managed no differently than any other area of the forest that is not designated by the Congress as Wilderness. There is absolutely no reason to make the FS manage roadless areas as de facto wilderness or any other special designation. All activities that are permitted within the forest should be allowed within "roadless" areas to the extent that current forest management plans allow. If a concession must be made and the agency is compelled to add yet another restrictive management prescription then prohibit the building of new paved or other all weather roads or upgrading of the primitive roads. Allow the primitive, or "jeep" roads to evolve as use and weather dictate (assuming that there is no significant resource damage as a result). (Individual, El Dorado, KS - #A5117.90100)

902. Public Concern: The Forest Service should permit currently allowed activities in roadless areas to continue.

In general, use of the roadless areas should be a continuation of existing use. That is, if grazing is an existing use, it should continue as before and under the same environmental controls. This is a case where "sustainability" should be the guideline. Even limited logging might be considered if it can be done by air and without roads. One use that should not be allowed is mineral extraction since it requires roads and this is not an existing use in a roadless area. The USGS has stated that roadless areas have a small fraction of one per cent of the mineral resources of the country so this is no loss to the country. (Individual, Boulder, CO - #A5250.90110)

903. Public Concern: The Forest Service should protect local communities from sudden restrictions and bans from activities that had previously been legal.

What are the characteristics, environmental values, social and economic considerations, and other factors the Forest Service should consider as it evaluates inventoried roadless areas? The local community should be protected from sudden restrictions and bans on activities that have previously been legal. (Individual, No Address - #A850.45611)

904. Public Concern: The Forest Service should allow some people to live by themselves, in roadless areas.

IN SMALL NUMBERS

Human woods-dwellers and squatters must be treated with tolerance. However, if large groups of people begin perpetually inhabiting roadless areas, they must be approached calmly and asked to leave. Hermits and solitude-seekers should not be disturbed, however. (Individual, Olympia, WA - #A25533.90000)

Do Not Allow/Restrict Activities

905. Public Concern: The Forest Service should prohibit certain activities in roadless areas.

Activities that should be prohibited in roadless areas through Forest Plan revisions or amendments are clear cutting, mining, grazing and recreation/resort development. Those activities that should be allowed are low impact, non-motorized recreation. (Individual, Boise, ID - #A674.90000)

Activities prohibited in Roadless Areas should include mining, logging, drilling of any kind, and the increasing threat of ORV traffic. Motorized use for rescue would be ok. (Individual, Memphis, TN - #A1032.90000)

No road building, or off road vehicle travel, logging or mining should be allowed in the roadless areas. (Individual, Elk City, ID - #A1064.90000)

ACTIVITIES THAT ARE HARMFUL TO THE ENVIRONMENT OR THAT PRESENT A LIABILITY CONCERN

If we allow activities that are inconsistent with the landscape, we will be sacrificing our resources and those of every generation to come for short-term greed. The long-term health of a system is more important than having to deal with a lawsuit from the Snowmobiling Association of America. If you have a sound biological basis for denying an activity, you should not lose in court. Similarly, if you have a solid liability issue for denying an activity, you should not lose in court. For example, if many people using jet skis on public land (water) get hurt and sue the Forest Service, the activity presents a liability concern. Allowing the activity isn't worth accepting the liability attached to it. (Individual, No Address - #A29243.90000)

ACTIVITIES THAT REQUIRE ROADS

It is pretty clear that activities that do not need a road should be allowed and those that need roads or create roads should be banned. Even administrative use of roads in roadless areas is silly as these areas have been maintained for years before vehicles. (Individual, No Address - #A472.90000)

ACTIVITIES THAT CAUSE EXCESSIVE NOISE

Roadless areas because of their roadless status, have "managed" themselves quite successfully through natural selection processes which operate independently of human agency. The only management they require is protection from human-introduced degrading influences, such as motorized vehicles, logging, fire, mining and noise or other encroachment. (Individual, Port Angeles, WA - #A6179.30100)

DRUG RELATED ACTIVITIES

In distinction to many of the radical environmentalists, some of whom are involved with illicit drug cash crops, I believe that illicit drug cash crops should be withheld from these roadless areas. (Individual, Klamath Falls, OR - #A6931.90110)

Excessive amounts of land deemed "roadless" will not be able to be used by most law abiding people but may actually get a lot of usage from illegal aliens, drug smugglers, and in some cases, drug farmers. (Individual, No Address - #A931.90000)

METH labs and dope farms should be prohibited on federal Forestland as it is in all other places. (Individual, Orofino, ID - #A17317.90110)

MILITARY TRAINING

We feel that the following activities should be expressly prohibited in all roadless areas on FS land: livestock grazing, road building, road maintenance, motorized recreational vehicle use, military leases for training, trapping, commercial mining and herbicide use. (Individual, Nine Mile Falls, WA - #A15241.90110)

MILITARY TESTING

Activities prohibited: . . . Military bombing ranges. (Individual, No Address - #A28602.90110)

906. Public Concern: The Forest Service should not allow individual forest plans to make exceptions for specific activities.

Although I myself ride an off-road motorcycle, the use of motorcycles should be prohibited in almost all areas except those specifically designated as such. Motorcycles, the two-wheel variety, are never ridden with care and/or consideration for the land or the environment. They leave ruts in the trails, which cause erosion, and the riders have a tendency to make their own trails without any consideration for anything. (Individual, Maricopa, CA - #A3732.90110)

I am writing because I am against any change to the Roadless Area Conservation Rule. The current rule strikes a balance between preserving our remaining wild lands and accommodating competing uses; there is no good reason to change the rule. I particularly oppose allowing individual national forests to opt out of the rule and decide to go back to logging, building roads in, or otherwise developing these pristine wild areas, above all those in Alaska's Tongass rainforest. (Individual, Cleveland, OH - #A4484.90110)

Travel Management General

Summary

Access – A number of respondents assert that the Forest Service should provide access to roadless areas. One Organization remarks that Forest Service rulemaking must not restrict public access to narrow corridors along a few major roads. They believe this is the current trend and are concerned that forest users will be impacting areas because access is not distributed better. Some state that the Forest Service should not allow the presence of an endangered species to block access to lands; others request that the Agency not penalize the whole population because of the irresponsible actions of a few.

Other respondents assert that the Roadless Area Conservation Rule would have no effect on access. One individual declares that there are so many existing roads to travel, that he does not believe will be closed in the future, that no one should be concerned about be locked out of the forest.

Adequacy of Analysis – A number of respondents suggest that the Forest Service should carefully examine and evaluate the entire road system. Specifically, people ask the Agency to evaluate the use of each road to determine which existing roads are needed for effective long-term management, what new roads should be built, and which roads should be obliterated. As part of this analysis, one organization suggests the Forest Service document visitor usage on all forest travelways, and that it use the FS-643 Roads Analysis publication to determine the specific values of each motorized road and trail.

One point of disagreement among respondents is the adequacy of the evaluation of road impacts presented in the Roadless Area Conservation Rule EIS. According to one state agency, that evaluation is flawed inasmuch as most roads in inventoried roadless areas are temporary roads and "the ecological impact of temporary roads or roads closed to the public is significantly different than those used to describe and justify the conclusions reached in the evaluation." Another respondent states, however, that the original EIS described the impact roads have on the landscape and it is this person's opinion that no one has proven otherwise.

Funding – A few individuals discuss funding as it applies to travelways in general. These respondents suggest that the Forest Service increase the budget to fix the road system, allocate funds according to specific road priority, not charge fees for road use, and request funding to support trail programs.

Travelways – Some respondents say the Forest Service should remember the purpose of the national forest transportation system—that is, to "support management activities and access needs into the foreseeable future." One Organization states that the Agency should base road management decisions on the individual merits of each travelway inasmuch as "the cumulative effect of not analyzing each road and trail segment is tremendous." This same organization also recommends that the Forest Service establish a multiple use review board to guide travel management decisions. On the other hand, at least one individual asserts that dirt roads and trails should be allowed "without the government being involved with or being held accountable in any way shape or form."

Roads – A number of respondents state that the Forest Service should work with states and respect their authority with regard to road management decisions. One state agency, for example, states that the Forest Service should incorporate management direction for public roads which are under the jurisdiction of local governments. According to others—the Forest Service should give due consideration to the position of local authorities regarding road rights; should respect states' section line laws; should address roads which appear on older system maps, roads which are of local importance, and Revised Statute 2477 rights of way (see also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Revised Statute 2477*); and should acknowledge the existence of every access road. An Organization states that the Forest Service should not imply there are more roads than there actually are.

Other respondents think that the Forest Service should acknowledge that the Roadless Area Conservation Rule would not close roads or prevent the construction of new roads in already roaded areas; should approve the location of roads at the national level following proposals from local authorities; and should place the burden of proof for justifying road construction on those proposing roads.

Trails – General comments regarding trails include the request that the Forest Service explain how trail rules work with a roadless designation; the suggestion to rotate trails in roadless areas in order to prevent resource damage; and the claim that the Agency should stop turning existing trails into roads inasmuch as "roadless national forest trails should be restored to their traditional uses and purposes as foot and horse trails, not motor vehicle speedways." One respondent suggests eliminating specific trail width rules, while others suggest that the width rules protect trails from off-road vehicle damage. Finally, one Organization asks the Forest Service to recognize that trails which are not authorized through a public planning process are illegal.

Access

907. Public Concern: The Forest Service should provide access to roadless areas.

BEYOND NARROW CORRIDORS ALONG A FEW MAJOR ROADS

Forest Service rulemaking must avoid restricting public access to narrow corridors along a few major roads. The current trend to restrict public access to narrow corridors in the forest will concentrate over 90% of the forest visitors to less than 10% of the forest area. This trend is occurring in all of our

National Forests. The cumulative impact from concentrating forest visitors to narrow corridors is not reasonable management of our public lands and access to our public lands. The document must evaluate the cumulative impacts from management goals that concentrate visitors and eliminate dispersed recreation opportunities including, impacts to quality of recreation, diversity of recreation, equal allocation of recreation opportunities, wildlife, trails, erosion, vegetation, and reduced recreation opportunities for motorized visitors. (Organization, Helena, MT - #A13226.90000)

TO THE BOUNDARIES OF ROADLESS AREAS

Please provide public access TO THE BOUNDARIES of roadless areas at about 5-mile intervals. (Individual, Billings, MT - #A7295.91110)

908. Public Concern: The Forest Service should not allow the presence of an endangered species to block access to lands.

If GAG [Green Advocacy Group] determines that a 5000-acre parcel of land contains some variant of plant/animal sub-species classified or "classifiable" and "endangered" by the ESA, the 5000-acre number meets the requirements for a wilderness designation. But let's also say that there is a road running through the center of the parcel leading to something like a privately owned camp. By the presence of supposedly endangered sub-species, the green groups can effectively close off access to the road by claiming that the presence of the road and the traffic it generates are a threat to the plant/animal in question. Once the ESA has been used to close the road and deny access to the private property, the greens can then lobby to have the area declared a "Wilderness Area." Since the road no longer technically "exists," it and the land surrounding it are permanently taken out of any meaningful public usage. By the time all the complaints are filed, lawsuits are prepared, pickets are organized, and propaganda is distributed, nearly everyone involved will have forgotten one very important point. It was the ESA that effectively "created" the endangered sub-species where none existed before. This led to the loss of access to both private and public property, and the ultimate designation of a wilderness area that would not have met the requirements for such on its own merits. (Individual, Jefferson, OR - #A775.25100)

By eliminating vast areas from public access to purportedly protect some endangered species is just a subterfuge for controlling and re-engineering citizens' life styles. This goal of the radical environmentalists disregards the rights of the individual which is an American tradition. (Individual, Crescent City, CA - #A6097.50000)

909. Public Concern: The Forest Service should prohibit new road construction and regulate commercial ventures, but continue to allow access on existing routes.

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

Roadless should mean the desire to keep an area free from roads, not a goal to remove roads from an area that already has them. I see no conflict with public access for recreational purposes and wilderness designations, even if the access includes motorized vehicles. I frequent routes in our National Forests that have been in place in excess of 125 years (I have adopted such a route, 3N02, Burnt Flats Trail, in the San Bernardino National Forest in California) and there is no indication of habitat destruction, let alone damage to the habitat, as a result of vehicular access to these routes. If an area is defined as Roadless, yet there are already routes established, then the Roadless Designation should mean that no new routes be established, and heightened regulation of commercial ventures should take place. But, in no case should recreational access be restricted from existing routes in our National Forests and Parks. (Individual, Murrieta, CA - #A367.45523)

910. Public Concern: The Forest Service should not penalize the whole population because of the irresponsible actions of a few.

There are a small handful of people who deliberately destroy public property and lands. Please don't penalize all of us for their actions. Let the fines be steep for those who leave designated trails and unattended fires or destroy habitat. We have gotten completely out of control by allowing people to shrug off responsibility. Make people responsible for their own actions. If the coffee is hot and it burns the person who bought it, it is an accident not a liability. Please do not restrict access to our mountains. They are our backyards. There are millions of acres that are unaccessible to motorized vehicles. These areas have no roads and no sign of human intervention. It is impossible for anyone to access these areas. (Individual, Spring City, UT - #A833.10130)

911. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule does not affect access.

I certainly will not have time to travel the existing system of roads during my lifetime. None of these existing roads would be closed as a result of the Roadless Rule, and Coloradoans would continue to have access to these lands as well as access to private and State-owned lands. (Individual, Aspen, CO - #A5119.10111)

I ride an off-road motorcycle and enjoy hiking. I would like to see the government maintain roadless areas. I believe we have enough areas for public access where we can ride, walk, etc. (Individual, No Address - #A796.10150)

There are already enough millions of miles of access roads in our National Forests. Please do all that you can to maintain the Roadless Area Conservation Rule. It is the best thing for our country now and into the future. (Individual, Bayside, CA - #A12071.10111)

TO ALASKA'S NATIONAL FORESTS, BECAUSE THERE IS UNIQUE MARINE ACCESS

Some critics of applying the roadless policy to Alaska's forests have suggested this will prevent public access to forest resources for recreation and tourism. Both of Alaska's national forests, however, encompass an unusual system of coastal islands and fiords that provide unique marine access ranging from kayaks and small boats to the Alaskan ferries and major cruise ships. The Seward Scenic Byway and Alaska Railroad bisect the Chugach National Forest and provide additional access for many different activities. With marine access, including the Alaska Marine Highway System, and the existing highways, roads, railroad, and trail system, both of Alaska's national forests offer substantial access for recreation, tourism, and local resource users, including subsistence. Not only does this provide reasonable access, it offers unique opportunities that will attract national and international visitors to our state for experiences that are becoming increasingly rare elsewhere throughout the world. (Organization, Anchorage, AK - #A22992.40000)

Adequacy of Analysis

912. Public Concern: The Forest Service should document visitor usage on forest travelways.

Comments and concerns expressed by motorized visitors indicate that the current allocation of recreation opportunities is not balanced. During the preparation of the environmental document, the Forest Service must count and classify visitors using the forest travelways. Our observations show that these travelways are frequently visited by hundreds of motorized visitors. We see very few non-motorized recreationists on multiple-use lands. We see very few vehicles parked at hiking trailheads leading to thousands of acres closed to motorized visitors.

The Forest Service must also interview motorized visitors on these travelways. Interviews will document that these travelways are very important to motorized visitors and that these visitors are concerned about

the declining availability of motorized recreation and access opportunities in the National Forest. (Organization, Helena, MT - #A13226.15152)

913. Public Concern: The Forest Service should use the FS-643 Roads Analysis publication.

TO DETERMINE THE SPECIFIC VALUES OF EACH MOTORIZED ROAD AND TRAIL

A science-based approach to the analysis of forest roads is presented in the Forest Service publication FS-643 Roads Analysis which was published in August 1999. This document must be used in this evaluation to determine the specific values of each motorized road and trail. This document includes a comprehensive overview of considerations and issues, suggested informational needs and sources, and analytical tools that must be evaluated during the analysis of forest roads. Many of the considerations and issues presented in FS-643, if evaluated adequately and fairly, would support keeping primitive roads and trails in the project area open for motorized recreation, handicapped, elderly, and physically impaired.

The rulemaking process must make full use of FS-643 Roads Analysis Manual in order to properly account for the social, economic, cultural, and traditional values that motorized roads and trails provide to the public. FS-643 must be used on every road and trail segment in order to properly identify and evaluate the needs of motorized visitors and in order to avoid contributing to additional cumulative impacts to motorized visitors. (Organization, Helena, MT - #A13226.16110)

914. Public Concern: The Forest Service should consider the impacts of roads described in “Conservation Biology.”

As you consider the Rule, I urge you to read about impacts of roads described by Trombulak et al. 2000 in *Conservation Biology*. (Individual, Bellingham, WA - #A16218.14500)

915. Public Concern: The Forest Service should carefully examine and evaluate the entire road system.

FOR EFFECTIVE LONG-TERM MANAGEMENT

Obviously there are roads that serve no purpose. Modern logging equipment, for example, doesn’t require the road densities that older equipment did. We would hope that you would carefully examine and evaluate the entire road system and determine what existing roads are needed for effective long-term management. What new roads should be built and what roads should be obliterated. Now would seem a prudent time to do that in conjunction with roadless area disposition decisions. (Individual, Lewiston, ID - #A2872.45100)

BY EVALUATING THE USE OF EACH ROAD

It is WRONG to evaluate roadless areas, as no National Forests are without roads. It should be thought of from a new direction: Where there is some distance between roads (this will vary from place to place), what will best benefit the nation? Will utilizing the resource be it? If so, more roads may be absolutely necessary. However, all roads do not have to be open for all people at all times. Use whatever roads that are necessary to manage the area. Roads may in fact not be needed until some point in the distant future. (Individual, Aloha, OR - #A3675.45000)

TO DETERMINE WHICH EXISTING ROADS ARE NEEDED FOR EFFECTIVE LONG-TERM MANAGEMENT, WHAT NEW ROADS SHOULD BE BUILT, AND WHICH ROADS SHOULD BE OBLITERATED

Roads that compose the National Forest transportation system were built and placed to support management activities and access needs into the foreseeable future. They represent a tremendous investment and serve us well. However, it seems that Forest Service leadership has forgotten the purpose of this system. The past Assistant Secretary of Agriculture, when asked by a reporter why all these roads had been built, said he had no idea. He then cited irrelevant comparisons of the mileage of national forest roads and the interstate system. Soon after the interview the agency embarked on an aggressive program to obliterate and decommission as many miles of road as they could in the time left for the

administration. Timber sales at one time maintained the lion's share of these roads, but when these disappeared funding was not requested to take up the slack. The lack of funding was then cited as the reason for obliterating the roads.

Obviously there are roads that serve no purpose. Modern logging equipment, for example, doesn't require the road densities that older equipment did. We would hope that you would carefully examine and evaluate the entire road system and determine what existing roads are needed for effective long-term management, what new roads should be built and what roads should be obliterated. Now would seem a prudent time to do that in conjunction with roadless area disposition decisions. (Individual, Cloquet, MN - #A8272.45500)

TO DETERMINE THE ENVIRONMENTAL EFFECTS OF THE ROUTES IN THEIR CURRENT CONDITIONS

Require an analysis of all existing routes to determine the environmental effects of the routes in their current conditions.

Once the inventory discussed above is completed, it will be necessary to evaluate the existing routes to ensure compliance with environmental laws and regulations. In some cases, routes that exist and are being used are resulting in unacceptable environmental impacts. These routes will need to be relocated or repaired to ensure that the impacts are reduced to an acceptable level. This evaluation would identify the actions that are necessary to accomplish this objective. (Organization, Salt Lake City, UT - #A12009.45524)

THROUGH INDIVIDUAL FOREST PLANS

Every forest has a plan. This should describe the project roading during the plan's life and reveal the total road system projected, including roads into unroaded parts of the forest. If it doesn't, that's a plan flaw that needs correction. (Professional Society, Saint Leonard, MD - #A9040.90000)

IN NORTH DAKOTA

One of the major issues regarding proposed wilderness and now roadless conservation areas in North Dakota is the fact that these areas have extensive road systems. This fact was acknowledged in the 1987 Custer Forest Plan. *See* Custer FEIS, Appendix C. The 1999 draft plan revision, which preceded the roadless rulemaking by a few months, omits any enumeration of roads, although these roads still exist. The 2001 DPG FEIS does not address the specific comments made about each unit, especially the roads found throughout these units. The Forest Service only counted state highways and forest development roads, thus omitting the roads under dispute as well as private easements.

The ANPR does not correct this failure because it assumes that all of these roadless conservation areas are in fact roadless. Unless and until the Forest Service addresses this issue, no amount of process will undo the harm to North Dakota communities and governmental interests. (Organization, Denver, CO - #A21358.45520)

916. Public Concern: The Forest Service should recognize that the evaluation of road impacts in the Roadless Area Conservation Rule is flawed.

BECAUSE MOST ROADS IN ROADLESS AREAS ARE TEMPORARY ROADS

The Environmental Impact Statement (EIS) developed for this proposal is flawed in its evaluation of road impacts. In most cases the roads identified as having significant impacts are unrestricted access permanent year-round graveled or paved roads. However, most of the roads currently found in Inventoried Roadless Areas (IRA), particularly in the Lake States National Forests, are temporary and/or closed to public access. The ecological impact of temporary roads or roads closed to the public is significantly different than those used to describe and justify the conclusions reached in the evaluation. (State Agency Madison, WI - #A28775.90120)

917. Public Concern: The Forest Service should consider that the analysis on road impacts in the Roadless Area Conservation Rule is adequate.

The original EIS thoroughly described the impact roads have on the landscape in its broadest sense. To my knowledge, no one has shown serious flaws in the analysis. Those impacts will not change just

because the timber and mining industries want to continue business as usual. The Forest Service has a duty to protect the land and water for a variety of uses. The original Roadless Rule did just that. The government should implement the rule without delay. (Individual, Marquette, MI - #A22634.10150)

918. Public Concern: The Forest Service should compare the effects of roads with other less intrusive access and recognize the basic principles of ecology.

Arguments for reopening the Roadless rule have complained about the limited management practices for improving forest health (fire suppression, pest infestations, etc). This argument neglects to compare the effects of roads with other less intrusive access and fails to recognize basic principles of ecology. Roads do not improve the health of ecosystems. The existing Roadless Rule Policy should not be altered. The existing rule should be implemented immediately. (Individual, Juneau, AK - #A11676.10150)

919. Public Concern: The Forest Service should address benefits to the Appalachian National Scenic Trail.

FOR ROADLESS AREAS IN THE VICINITY OF THE TRAIL

Direct and indirect benefits to the Appalachian National Scenic Trail should be addressed for those roadless areas in the vicinity of the Trail. (Organization, Harpers Ferry, WV - #A21737.45621)

920. Public Concern: The Forest Service should ensure that if an illegally created route is to be reclassified as a trail, it must first undergo site-specific, National Environmental Policy Act analysis.

TO GAIN CLASSIFIED STATUS UNDER THE TRAIL SYSTEM

. . . if the person mapping classified and unclassified travelways as part of the Road Management Strategy determines that the route should be reclassified as a trail (motorized or non-motorized), and if that travelway has been illegally constructed or maintained, it still must go through site-specific NEPA analysis to gain "classified" status under the trail system. While construction and reconstruction of trails is listed as a categorical exclusion, user-created travelways violate 36 CFR 261.10(a) as stated above, because they have gone through no planning, making them technically illegal. (Organization, Missoula, MT - #A21359.90420)

Funding

921. Public Concern: The Forest Service should increase the budget to fix the road system, restore degraded areas, and impose much stricter standards on any new road construction in the Tongass National Forest.

IF THE TONGASS NATIONAL FOREST IS EXEMPTED FROM A NATIONAL ROADLESS RULE

Southeast Alaska stands to benefit the <u>least</u> from continued entry into roadless areas and benefit the <u>most</u> from a permanent suspension of road building. Saving the roadless areas on the Tongass will result in preserving the best lands this country has left. If our powerful Congressional delegation wins out for a few special interests and the Tongass is exempted, the budget to fix the road system and restore degraded areas should be increased dramatically and much stricter standards imposed on any new road building. (Individual, Juneau, AK - #A23242.45623)

922. Public Concern: The Forest Service should allocate funds according to specific road priority.

I think that the Forest Service budget should prioritize roads that need maintenance first, then decommissioning unneeded roads (without limiting access in the future), and then if funds are available, build new roads. (Individual, North Bend, OR - #A30657.17240)

923. Public Concern: The Forest Service should not charge fees for road use.

Do not charge for road use. (Individual, Cody, WY - #A18367.90110)

924. Public Concern: The Forest Service should request funding to support trail programs.

Please ask for funds to adequately support the Forest Service's recreation and trail programs. For many years the Forest Service has said they support recreation but they have NOT asked for the appropriated monies to do so. "On the ground monies" have decreased for the last 3 years, while money for various other plans has increased! Please ASK for more money for field level staff and projects. (Individual, Livermore, CA - #A23445.91211)

Travelways

925. Public Concern: The Forest Service should remember the purpose of the national forest transportation system.

TO SUPPORT MANAGEMENT ACTIVITIES AND ACCESS NEEDS INTO THE FORESEEABLE FUTURE

Roads that compose the National Forest transportation system were built and placed to support management activities and access needs into the foreseeable future. They represent a tremendous investment and serve us well. However, it seems that Forest Service leadership has forgotten the purpose of this system. The past Assistant Secretary of Agriculture, when asked by a reporter why all these roads had been built, said he had no idea. He then cited irrelevant comparisons of the mileage of national forest roads and the interstate system. Soon after the interview the agency embarked on an aggressive program to obliterate and decommission as many miles of road as they could in the time left for the administration. Timber sales at one time maintained the lion's share of these roads, but when these disappeared funding was not requested to take up the slack. The lack of funding was then cited as the reason for obliterating the roads. (Individual, Boise, ID - #A5165.16110)

926. Public Concern: The Forest Service should base road management decisions on the individual merits of each travelway.

BECAUSE THE CUMULATIVE EFFECTS OF NOT ANALYZING EACH ROAD AND TRAIL ARE SIGNIFICANT

We are concerned about the way that area closure is approached during the planning process. Past actions have closed many roads and trails to motorized recreation and access without addressing the merits of each one. Justification has included reasons such as ghost roads, user created roads etc. that are not site specific and do not amount to adequate justification. The fact is that many forest roads and trails in use today have been created by forest users going back to the early days of history when all of the forest was "open" to motorized access. The Forest Service cannot select which roads are useful to keep and which are not without a site-specific analysis. The cumulative effect of not analyzing each road and trail segment is tremendous. The decision-making must be based on the individual merits of each travelway. (Organization, Helena, MT - #A13226.45440)

927. Public Concern: The Forest Service should establish a multiple use review board to guide travel management decisions.

Motorized recreationists are concerned that a reasonable alternative will not be adequately addressed in the environmental document and decision-making. To prevent this from happening, we request a Multiple-Use Review Board be established to assure that the decision-making reflects the multiple-use management goals and the needs of the public. We request that a Multiple-Use Review Board look into all past travel management decisions in the National Forest to determine whether all decisions have adequately considered the needs of multiple-use and motorized recreationists. Where decisions have not adequately considered the needs of multiple-use and motorized recreationists, we request that the reasons be identified and that corrective actions be taken. (Organization, Helena, MT - #A13226.50200)

928. Public Concern: The Forest Service should allow only temporary access ways in roadless areas.

WHICH ARE OBLITERATED WITHIN A YEAR OF CONSTRUCTION

No developed roads should be allowed in any roadless area for any reason. Temporary access ways, obliterated within the year, would be permissible when created for certain limited purposes. Activities dependent upon road building would be consequently, prohibited. (Individual, Pendleton, OR - #A30482.90110)

929. Public Concern: The Forest Service should not be responsible for road and trail management.

I do not believe in keeping the roadless areas roadless. I believe in dirt roads and trails without the government being involved with or being held accountable in any way shape or form. (Individual, Pittsgrove, NJ - #A8198.90410)

930. Public Concern: The Forest Service should make parking areas available.

Make parking areas available. (Individual, Carlisle, PA - #A11410.90000)

Roads

931. Public Concern: The Forest Service should incorporate management directions for public roads which are under the jurisdiction of local governments.

We note that the proposed road rules included a reference to "Public Roads" which are in addition to the "classified" and "unclassified roads." We suggest to avoid confusion and to be consistent with the companion rulemaking that the proposed rules also incorporate management direction for these "Public Roads" which are under the jurisdiction of the local governments. (County Attorney, Grant County, OR - #A17667.45512)

932. Public Concern: The Forest Service should give due consideration to the position of local authorities regarding road rights.

As the comments filed with respect to the Draft Plan Revision and the roadless regulations show, the Forest Service needs to accept information instead of discarding it because it is contrary to policy or the Forest Service "disagrees." In the context of the road issue, the Forest Service represents these areas as roadless on the basis that the agency does not agree with the position of the state of North Dakota that the section line laws and pre-existing easements must be acknowledged. Absent a court determination, the North Dakota Attorney General opinion is entitled to far greater deference than a Forest Service letter saying the agency does not agree. The Forest Service is not authorized to adjudicate road rights. (Organization, Denver, CO - #A21358.10135)

933. Public Concern: The Forest Service should respect states' section line laws.

NORTH DAKOTA'S LAWS

At the beginning of the North Dakota forest plan revision process; the Forest Service presented the North Dakota counties with a "demand" for all roads and easements claimed by the counties. This demand was not only unreasonable and expensive but ran counter to the presumptions in North Dakota law that the counties need not prove existing public roads. The counties declined to spend scarce county funds on a massive title search but invited the Forest Service to conduct its own search. To date, the Forest Service has not done so, implicitly admitting that the undertaking is expensive and time-consuming.

The problem was only exacerbated by the Forest Service moratorium on R.S. 2477 roads and its official position that the North Dakota Section line law does not apply to lands owned by the United States. The problem reached the point where McKenzie County state's Attorney asked for an opinion from the state attorney general on this issue. The Attorney General concluded that North Dakota Section Line law does apply and further that the case law incorporating R.S. 2477 principles also extends those rights-of-way to the National Grasslands. The Forest Service has chosen to "disagree" and uses its disagreement to ignore all of the county public roads, especially in the context of the roadless issue.

Thus, the Forest Service approach polarizes the issue and excludes valuable information from its internal record. (Elected Official, Watford City, ND - #A27737.45400)

934. Public Concern: The Forest Service should address roads which appear on older system maps, roads which are of local importance, and Revised Statute 2477 rights-of-way.

Roadless proposal ignores roadless definition of 1964 wilderness Act and RS2477 rights-of-ways. The USFS administration interpretation of roadless areas as it has been used to identify "roadless areas" is contrary to the 1964 definition of a road and RS2477 rights-of-ways. This definition will perhaps one day be the subject of a case the Supreme Court may hear. USFS personnel in public informational meetings frequently define many existing roads in 'roadless" areas as "illegal" or "unauthorized" roads. Some of the roads are recent and unauthorized, but many of these roads have existed for several decades and some predated the creation of the national forest system. We suggest that the real roadless areas are much less than those presently identified. True roadless areas are generally well deserving of the name and should be designated as such, but much of the so called "roadless areas" have significant roaded areas that don't appear on recent USFS "systems" maps. Roads appearing on older system maps, those of local importance and RD2477 rights of ways issues are yet to be resolved. It is not appropriate for the roadless proposal to ignore these outstanding issues. (Professional Society, No Address - #A27584.20200)

935. Public Concern: The Forest Service should acknowledge the existence of every access road.

The "Roadless initiative" does not even acknowledge the existence of more than 70% of existing access roads thereby eliminating them. (Individual, Reno, NV - #A1108.45100)

936. Public Concern: The Forest Service should not imply there are more roads than there are.

The agency must make a commitment to the public to be unbiased in its decision making and reporting.

Example (1): Under the former administration the Forest Service wrote, "The current national forest road system includes 380,000 miles of road, enough road to circle the globe more than 15 time" [Footnote 18: 64 Fed. Reg. 56306] (making it sound like there is an extraordinarily amount of roads). However, the agency failed to make their balancing statements such as, "roads comprise less than 2% of the total National Forest System [Footnote 19: 1 mile = 5,280 feet x 100 feet (width of impact) = 528,000 square feet. 528,000 sq. feet divided by 43,560 sq. feet (1 acre) = 12.12 acres. Therefore, 1 mile of 100-foot wide road impacts 12.12 acres of land. There are 380,000 miles of roads in the National Forest System (see 64 Fed. Reg. 56306). 380,000 miles of roads impact 4.6 million acres (380,000 x 12.12 = 4.6 million). There are a total of 192 million acres in the National Forest System (See Roadless Area Conservation FEIS, p. A4). 4.6 million acres divided by 192 million acres = 2.19% 625 miles of roads could be maintained as Level 2, high-clearance roads, <u>for 834 years</u> for the same cost of fighting wildfires for one year! [Footnote 27: Coghlan, G.; Sowa, R. 1998. <u>National Forest Road System Use (draft)</u>. Engineering staff, USDA Forest Service, p. 13. Average cost to maintain a Level 2 road is $100.00/mile/year. www.fs.fed.us/new/roads/roadsummary.pdf 625 miles of road x $100.00 x 834 years = $52.125 million]. (Organization, Chesapeake, VA - #A11804.10141)

937. Public Concern: The Forest Service should consider temporary/short-term roads for non-timber management objectives.

SUCH AS WILDLIFE HABITAT IMPROVEMENT PROJECTS, FUEL TREATMENTS, PREVENTATIVE TREATMENTS FOR INSECT AND DISEASE PROBLEMS, ETC.

A piece that was sorely missing from the previous effort was options that included temporary/short-term roads for non-timber management objectives, such as wildlife habitat improvement projects, fuel treatments, preventative treatments for insect and disease problems, etc. These kinds of considerations are very difficult to address at a national level. (Individual, Missoula, MT - #A28297.13213)

938. Public Concern: The Forest Service should acknowledge that the Roadless Area Conservation Rule does not close roads or prevent the construction of new roads in already roaded areas.

This policy actually has a bigger bark than bite, as it will not entail the closure of existing roads or prevent the construction of new roads in already roaded areas. Most eastern forests will be virtually unaffected. Unfortunately, the small minority of Americans opposed to this plan are misstating the issues. (Individual, Syracuse, NY - #A1333.45100)

939. Public Concern: The Forest Service should approve the location of roads at the national level.

FOLLOWING PROPOSALS FROM LOCAL AUTHORITIES

Ultimately the location of roads will be proposed by local authorities and approved at the national level. This allows for the views of the States, tribes, local communities, and other organizations to be heard. This also disallows for bias at the local level. For example, if the local communities are primarily loggers, then the local authorities cannot be paid off to fight for the loggers' views. Although their views will be heard, the final decision will not be made at the local level. The checks and balances system will be implemented. (Individual, No Address - #A28579.13130)

940. Public Concern: The Forest Service should place the burden of proof on those proposing roads as roadless areas are evaluated.

As roadless areas are evaluated, the burden of proof should be on these proposing roads—established as the default as opposed to, for example, wilderness designation where the burden of proof is on the wilderness advocates and non-wilderness the default. (Individual, Spokane, WA - #A20648.45100)

Trails

941. Public Concern: The Forest Service should explain how trail rules work with roadless designation.

I'd like to see more focus on trails within Roadless areas, and how the Trails rules work with Roadless. (Individual, Meridian, ID - #A1683.45500)

942. Public Concern: The Forest Service should rotate trails in roadless areas.

TO PREVENT RESOURCE DAMAGE

Trails in roadless areas should be rotated. Much has been said about resource damage due to trails but I view trails as I view a living document. Its course and path should change gradually over time. This gives the trail time to heal and attain different qualities. (Individual, Palmer Lake, CO - #A23361.90410)

943. Public Concern: The Forest Service should stop turning existing trails into roads.

TO RESTORE TRADITIONAL USES

Forest planning should fulfill the agency's long-neglected duties under 36 CFR 295 to determine which specific areas or trails are appropriate, if any, for off-road vehicle traffic. To this end, MWA members [suggest]:

Stop churning trails into roads. Roadless national forest trails should be restored to their traditional uses and purposes as foot and horse trails, not motor vehicle speedways. (Organization, Helena, MT - #A21370.90421)

944. Public Concern: The Forest Service should eliminate the 50-inch trail rule.

We think the roadless rule should be implemented with the elimination of the so-called 50-inch trail rule. . . . (Organization, Brookport, IL - #A30260.91221)

945. Public Concern: The Forest Service should reconsider its elimination of the 40-inch rule.

AND RESTORE TRADITIONAL TRAILS THAT HAVE BEEN DAMAGED BY OFF-ROAD VEHICLES

Page 3 of the ANPR erroneously states that:

"Previously, the long-standing process employed by the Forest Service for all resource management decisions relied on amendments and revisions to the forest plans, governed by the National Forest Management Act. This is a highly collaborative process involving local regional and national interests."

This is not true. On June 25, 1990, the USDA-Forest Service published a federal register notice eliminating the long-standing "forty-inch rule" which protected national forest trails by prohibiting vehicles wider than 40 inches—such as ATVs—from driving on all national forest trials. This rule was considered crucial by field staff to maintain the distinction between roads and trails.

It was eliminated without amending forest plans, at the behest of ATV manufacturers wishing to expand sales of ATVs by selling them as "trail vehicles."

The administrative record shows this change was vigorously opposed by USFS field staff that correctly predicted disastrous consequences from opening trails up to ATVs. No effort was made to involve the public in the three page EA which supposedly justified this national mistake, nor is there any evidence that a single non-motorized, hunting, hiking, horseback or outdoor club was ever contacted before this change was foisted on the American people.

The U.S. Forest Service should clean up this mess and restore traditional trails that have been subsequently damaged by ATV traffic. (Organization, Helena, MT - #A21370.91221)

946. Public Concern: The Forest Service should recognize that trails which are not authorized through a public planning process are illegal.

Forest planning should fulfill the agency's long-neglected duties under 36 CFR 295 to determine which specific areas or trails are appropriate, if any, for off-road vehicle traffic. To this end, MWA members [suggest]:

Vehicle routes that were never authorized through a public planning process should be recognized for what they are: illegal scars and vandalism. (Organization, Helena, MT - #A21370.45500)

Road/Trail Construction

Summary

General Comments – The most common general comment regarding road/trail construction is that the Forest Service should construct and maintain an adequate system of roads and trails—as required by the Multiple Use and Sustained Yield Act (see also Chapter 2: Other Legal

Concerns: Federal Laws, Acts, and Policies: *Multiple Use and Sustained Yield Act*, and Chapter 4: Environmental Values: Management: *Multiple Use Management, Allow Multiple Use Management, and Do Not Allow/Reconsider Multiple Use Management*).

Funding – Some individuals state that the Forest Service has not been forthcoming regarding the availability of funds for road construction, and say the Agency should acknowledge that it has turned down money offered by Congress for road construction. Other suggestions include revising the way the accounting department handles road construction by calculating depreciation over the life of the road; shifting funding priority to trail construction and maintenance; and dividing Green Sticker and gasoline tax funds equally between management costs and new trail costs.

Road Construction – General comments regarding road construction include the suggestion that needed road construction should be determined at the local level based on situation and need; or that it be determined on a case-by-case basis by ecologists unassociated with the Forest Service or extractive interests. One respondent remarks that the Forest Service should complete a management plan for existing roads before banning new road construction. Another suggests the Agency revise its discussion of roads in the Roadless Area Conservation Rule Draft EIS to reflect current improvements in road construction and maintenance. According to this respondent its not a matter of building roads or not building roads, but simply a matter of doing it right.

A number of respondents assert that the Forest Service should allow road construction in roadless areas—to provide access to users; to disperse recreation users; under specific exceptions; or when needed for public safety. Respondents say that the Forest Service should not use the maintenance backlog as an excuse to forego road construction. One organization points out that given the size of land mass managed by the Forest Service, that some maintenance backlog should be expected and considers the existing backlog relatively minor, so consequently should not prevent moving forward with an active roads management plan.

Others assert that the Forest Service should prohibit road construction in roadless areas—because roads lead to increased active management; increased natural resource removal; increased motorized use; increased illegal activity and abusive human behavior; and increased need for rescue operations. Some individuals state that roads contribute to trail destruction and to landslide danger. Others say that the difficult terrain in most roadless areas makes road construction difficult anyway. According to one elected official, “if there had been any real significant timber value or mineral value on those lands, the roads would have been built long ago.” One common assertion, however, is that the Forest Service should prohibit more road construction because it lacks the funding to maintain existing roads; thus some say new construction should not proceed until the backlog has been taken care of.

Trail Construction – Some respondents say trail construction should be allowed to continue. According to individuals and organizations, the Forest Service should construct more recreational trails, turn unneeded roads into less damaging trails, reroute “problem” trails rather than close them, establish connector trails, and construct hiking paths and trail shelters. A few respondents say the Forest Service should engage other groups in trail construction. According to one individual, the Agency should allow trail users to construct trails because it is unable to construct them efficiently itself. According to another, the Agency should work with off-road vehicle users in constructing trails to ensure environmentally responsible usage and rider safety and satisfaction.

Road/Trail Construction General

947. Public Concern: The Forest Service should construct and maintain an adequate system of roads and trails.

AS REQUIRED BY THE MULTIPLE USE AND SUSTAINED YIELD ACT.

. . . the congressional findings and declarations section of MUSYA states:

The Congress hereby finds and declares that the construction and maintenance of an adequate system of roads and trails within and near the national forests and other lands administered by the Forest Service is essential if increasing demands for timber, recreation and other uses of such lands are to be met; that the existence of such a system would have the effect, among other things, of increasing the value of timber and other resources tributary to such roads; and that such a system is essential to enable the Secretary of Agriculture (hereinafter called the Secretary) to provide for intensive use, protection, development, and management of the lands under principles of multiple use and sustained yield of products and services. 16 U.S.C. [section] 532. (Business or Association, Washington, DC - #A29622.20202)

Funding

948. Public Concern: The Forest Service should tell the truth regarding the availability of funds for road construction.

I've been told over and over that there isn't the money to do this or that or build trails and roads, and guess what? The USFS has been turning down money for roadbuilding for years. I'm told Congress won't give you money, but the fact is that Congress has been offering money and Dombeck has been turning it down! I was told this by a staff member on the committee for forests and forest health. So, the lie is told to the field people, and now the agency looks like a bunch of liars with an agenda. Can you dispute this? Can you prove me wrong? So go ahead and side with those so-called green groups and in a few years if you feel at a distance with the public, you will know why; the public will come to resent you all for keeping us off our public land. And don't be surprised if the public cares not a whit about stewardship because making a mess for a bunch of tyrants is a lot of fun. (Individual, Burbank, CA - #A18027.15121)

949. Public Concern: The Forest Service should revise the way the accounting department handles road construction.

BY CALCULATING DEPRECIATION OVER THE LIFE OF THE ROAD

Change the way the accounting department handles road construction. Depreciation should be over the life of the road, which, if maintained correctly, should last a very long time. (Individual, Princeton, WV - #A18086.90120)

950. Public Concern: The Forest Service should shift funding priority to trail construction and maintenance.

Because of the obvious desire and need for more hiking opportunities on National Forest land, funding priority should shift to trail construction and maintenance, not taxpayer funded road building that loses millions of dollars and leaves public lands denuded and useless to all.

My family and I visit roadless areas regularly. Having hiked the Boulder Ridge trail in the Mt. Baker National Forest (and then in the Sliver that's Mt. Baker Wilderness Area) just yesterday, I found it disturbing that the trail was posted as unmaintained this year due to budget and staffing concerns. Note I had a $30 trail-park pass on my windshield as I clambored over blow-down and bushwhacked through partially bushed trail. At the top of the ridge, the view of roads and clear-cuts crisscrossing entire mountains from top to bottom was especially galling. (Individual, Seattle, WA - #A4885.17120)

951. Public Concern: The Forest Service should divide Green Sticker and gasoline tax funds equally between management costs and new trail costs.

Green Sticker $ and gasoline tax should be divided equally between management costs and improvement/new trails costs. Do not spend most of the money on closures (i.e., management by laying new fences, road gates, signs stating trail closed)! (Individual, Thousand Oaks, CA - #A891.17130)

Road Construction

952. Public Concern: The Forest Service should determine needed road construction at the local level.

BASED ON SITUATION AND NEED

The roadless areas should be maintained with a status quo with the local ability to build or not to build roads based upon the situation and the need. (Individual, Maricopa, CA - #A3732.25000)

953. Public Concern: The Forest Service should examine the need for new road construction on a case-by-case basis.

BY ECOLOGISTS UNASSOCIATED WITH THE AGENCY OR COMMODITY INTERESTS

The need for new road construction to facilitate management activities for forest health reasons, and/or to bring wildlands back within their natural range of ecological variability should be examined on a case by case basis, with the burden of proof falling on ecologists that are independent of, and shielded from, extractive interests within and outside the agency. (Individual, Corvallis, OR - #A650.30200)

954. Public Concern: The Forest Service should specify whether road construction and reconstruction in other unroaded areas is to be under the jurisdiction of local land managers.

The original proposed rule discussed the prohibition on road construction and reconstruction in the inventoried roadless areas, but did not provide any guidance relative to the other unroaded areas. If it is the intent that road maintenance, reconstruction and construction are management decisions left to the local land managers' discretion, then to avoid confusion and more gridlock, we recommend that the rules clearly indicate this intent. (Elected Official, Roseburg, OR - #A11811.45420)

955. Public Concern: The Forest Service should complete a management plan for existing roads before banning new road construction.

The current situation relative to roads on USFS land is a question of management. Roads are needed to properly manage land. The issue is how they are managed once their original objective for development has been met. Roads properly designed, properly maintained and properly used are not evil, as some citizens believe. We think before any long-term decisions are made relative to road building bans a management plan for existing roads should be completed. (Organization, Flagstaff, AZ - #A6011.15100)

956. Public Concern: The Forest Service should revise its discussion of roads in the Roadless Area Conservation Rule Draft EIS to reflect current improvements in road construction and maintenance.

Roads in the forest are not like freeways (as the Administration has often compared them to in other documents). Considering the little use and low density of Forest roads, their contribution to "atmospheric emission" and "volatile organic compounds" (S-36), is minuscule and such claims are silly to be included in the DEIS, while other larger aspects of the issues are ignored.

The adverse environmental impacts that the DEIS [attributes] to roads is cloaked in terms like "potential" and "can." And nowhere in the DEIS are there any statements about how these impacts can be eliminated and/or are being mitigated. You don't have to stop building roads; you just have to do it

right. This is not to say that the DEIS is totally wrong in saying that roads can impact the environment, but road building by the Forest Service has changed a lot and the DEIS does not acknowledge that. Past mistakes have been corrected, roads are no longer put where they shouldn't be, roads are being removed that were incorrectly built, and forest engineers and hydrologists have been extensively trained in cutting edge, low impact road building and maintenance.

The DEIS mixes up generic philosophical opposition to all road and technology with specific, current, legitimate environmental concerns of road impacts. (Union, No Address - #A28881.90120)

957. Public Concern: The Forest Service should protect roadless areas.

TO REDUCE THE BACKLOG OF IMPROPERLY CONSTRUCTED ROADS

The current local land management planning and scoping for individual NEPA actions works fine. However, a national policy to protect roadless areas and to reduce the backlog of improperly constructed roads is sorely needed. (Individual, Juneau, AK - #A23242.13100)

Allow Road Construction

958. Public Concern: The Forest Service should allow road construction and maintenance in roadless areas.

We believe that forest roads and trails, properly constructed and maintained, are an investment and a critical part of forest management, emergency response and recreation use. These same roads, whether classified or not under USFS rules, are an increasingly important part of the rural transportation and recreation system. Roads and recreation trails should be maintained to the appropriate standards for expected us; and, maintained in an environmentally sound manner following standards, laws and regulations. With the exception of Wilderness established under United States Law, forest roads and trails are an extremely important public asset in all forest ownerships, including the national forests, and must be treated as a significant capital investment. (Organization, Los Gatos, CA - #A1062.90120)

You might want to consider building roads into these areas so that the public can use them too. Roads are not evil. They serve many good purposes. (Individual, Portland, OR - #A1110.90120)

TO PROVIDE ACCESS TO USERS

Roads into many of the mountain areas need to be maintained and open to the public. There are ENOUGH wilderness areas that need to remain so. The public has a right into mountain/forest areas. As they have the right to see they are cared for and not abuse this right of being on forest/mountain lands. OPPOSED TO THIS ROADLESS CONSERVATION RULE!!!!!!!! (Individual, Florence, CO - #A985.90120)

TO DISPERSE RECREATION USERS

The forest needs to be kept open to the public. The new policy of destroying existing roads in the name of watershed protection and habitat management leaves the average public locked out of the woods. Building new roads to give new access points for public recreation is important because many areas are already over used. Dispersing usage to new areas would be wise rather than shrinking the areas available to use. (Individual, Bozeman, MT - #A59.90120)

TO SPARE LOCAL GOVERNMENTS THE COST OF REPAIRS TO MAINTAIN NEEDED ACCESS TO UTILITY SITES

By not allowing the construction of new roads or repair of damaged ones, the health of the forest would be greatly in danger as the accumulation of dead, unharvested timber would cause a severe fire hazard and the continued infestation of the bark beetle. The only way to protect against a catastrophic fire and manage the forest's health is to maintain the forest through responsible logging and the thinning of hazardous vegetation. In addition, if a road were washed out on public lands, local governments would have unnecessary costs and red tape to follow to get a road repaired to access their water system. (Individual, Mayfield, UT - #A6629.30100)

TO PROVIDE ACCESS FOR NON-TIMBER FOREST PRODUCT GATHERING

My concern is that a major stakeholder is mostly left out of the road building deliberations the Forest Service is currently undertaking. The stakeholders in question are entities within the commercial and non-commercial non-timber forest product's (NTFP) sector in this country. NTFPs are forest resources such as mushrooms, truffles, boughs, cones, and botanicals for medicine, berries, beargrass, and maple syrup. Including medicinals, the NTFP wholesale sector is a multibillion dollar a year economy. As the Forest Service and other agencies grapple with ecosystem management NTFPs have only been minimally considered, and largely misunderstood. NTFPs, as many countries already have learned, represent an opportunity to manage the forest for increased biodiversity and forest health. NTFPs do not preclude selective timber extraction and are compatible with the emerging knowledge of fire ecology and restoration.

NTFP extraction requires various types of access paths ranging from simple trails to industrial roads. In most cases NTFPs do not require the type of heavy equipment road that typifies the majority built on our public forests. Effective NTFP extraction and ecosystem management needs could be carried out on less than the existing road infrastructure, but with old roads being modified to a range of levels from those for small vehicles, to ATVs, to horses, to bicycles, and to foot trails. New access ways could be built into existing roadless areas that would allow for NTFP extraction, but without damaging the ecosystem. Existing Federal road subsidies could be reduced and made available for the construction, alteration, and maintenance of simple, low impact roads and trails.

With greater emphasis on NTFPs the forests will become healthier and visually more appealing because of their diversity. Management for NTFPs will result in economic diversity and yields that will far exceed anything seen under the timber management approach. (Individual, Portland, OR - #A22188.65290)

WHEN NEEDED TO ADD TO THE TRANSPORTATION INFRASTRUCTURE THAT IS ESSENTIAL TO THE SECURITY AND ECONOMIC HEALTH OF THE NATION

The roadless rule is an example of unnecessary government micro-management and a very extravagant use of public funds. Current roadless areas must never be considered off-limits for building new roads if they are needed to add to the transportation infrastructure that is essential to the security and economic health of the nation. Over the last few years there have been more than an adequate number of wilderness areas preserved to accommodate the environmental groups that are so vocal, and that caused this hurried and flawed approach to conservation. Long-term conservation means that we must have a policy that allows placing roads such that they reduce the miles between cities, towns, and recreational areas. As an example: For me to drive to Roosevelt Lake in Arizona, a very popular recreational spot for those in the Phoenix area, I must drive about 180 miles, round trip. It could be less than half that with a new road that was placed properly. This kind of conservation is just as important as improving vehicle fuel efficiency and emissions controls for long term environmental preservation. (Individual, Fountain Hills, AZ - #A5990.10112)

UNDER SPECIFIC EXCEPTIONS

The exceptions for road construction include the following; (1) A road is needed to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property.

(2) A road is needed to conduct a response under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or to conduct a natural resource restoration under CERCLA, Section 311 of the Clean Water Act, or Oil Pollution Act. (3) A road is needed pursuant to reserved or outstanding rights, or as provided for by statute or treaty. (4) Road realignment is needed to prevent irreparable resource damage that arises from the design, location, use, or deterioration of a classified road and that cannot be mitigated by road maintenance. Road realignment may occur under this paragraph only if the road is deemed essential for public or private access, natural resource management, or public health and safety. (5) Road construction is needed to implement a road safety improvement project on a classified road determined to be hazardous on the basis of accident experience or accident potential on that road. (6) The Secretary of Agriculture determines that a Federal Aid Highway project, authorized pursuant to Title 23 of the United States Code, is in the public interest or is consistent with purposes for which the land was reserved or acquired and no other reasonable and

prudent alternative exists; or (7) A road is needed in conjunction with the continuation, extension, or renewal of mineral lease on lands that are under lease by the Secretary of Interior. (Individual, Asheville, NC - #A22623.90130)

BOTH PERMANENT AND TEMPORARY ROADS

Providing sustainable healthy forests should be the goal of all management. Our western forests are disturbance dependent, therefore plans for all Roadless areas must include descriptions of how such disturbance may be allowed or purposefully carried out. Such disturbances will logically favor orderly timber harvest and subsequent post-harvest measures—slash disposal, site preparation, reforestation, and stand stocking control. Road access may be provided by some permanent roads as well as temporary 'roll-up roads'. (Individual, Evergreen, CO - #A19178.30100)

It is important to note that in many cases the removal of small-diameter trees is used as an excuse for logging groups to implement roads that are later used as justification for further logging. This should be addressed directly in a way that would allow roads to be "expired" after a short time period after their initial use has been satisfied. (Individual, Rochester, NY - #A8831.30100)

TWO-TRACK ROADS

I am totally opposed to the Clinton-Gore Roadless plan. We must have our two track roads in Nevada if we are able to use the Forest for grazing, mining, recreation and hunting. (Individual, Park Valley, UT - #A15252.10130)

WHEN NEEDED FOR PUBLIC SAFETY

I believe the entire area immediately East of Ogden, Utah has been inaccurately inventoried as Roadless. There are a number of current and future roads that are now, or soon will need to be, located in this area.

Even if boundary adjustments could be made to exclude these existing and future roads from what is being called the Burch Creek Roadless Area, I believe the resulting area, (sandwiched by private mountain land on the North, developed ski resort land on the East, Ogden City on the West, and Interstate 84 on the South,) is too small to have the characteristics that are desirable in a roadless area. With roads, mountain bike trails, ski runs, ski race buildings and mountain restaurants at the upper fringes of the Burch, Beus, Strongs, Malans and Taylor drainages and with city streets and homes less than 3 miles away on the lower fringes, a roadless designation seems to invite unnecessary conflicts with the adjoining high-density recreation and urban uses. To effectively administer this land, I believe the Ogden Ranger District should have at its disposal the full range of National Forest uses without the strictures imposed by a roadless designation.

Current roads in the inventoried Burch Creek roadless area, as mapped on the FS website:

1) The road to the Mt. Ogden Telecommunications site in Section 6 of Township 5 North, Range 1 East, Salt Lake Base and Meridian.

2) The road and ski run at the top of Burch Bowl between DeMoisy Peak and Strawberry Peak in Section 8 of Township 5 North, Range 1 East, Salt Lake Base and Meridian.

New road needed in the inventoried roadless area:

1) A skier trail from the top of Snowbasin Resort's Strawberry Gondola north into Middle bowl. This skier road will improve skier egress from Strawberry Bowl at the end of the day, and when this road is built, it will allow the current, above ground high voltage electric line (from the top of the Mid Bowl Gondola to the top of the Strawberry Gondola) to be buried. This path is now used extensively by skiers taking the shortcut from Strawberry to Middle Bowl, resulting in a hazard as metal ski and snowboard edges cut through the insulation on the high-voltage line. A bigger hazard of not having this road (and accompanying underground power line) is that avalanche control charges are exploded in close proximity to the surface-power line. An unlucky avalanche charge could cut off power to the Strawberry Gondola for weeks if not months.

Given the two existing roads in this "roadless" area, and the need for a third, I respectfully request that the Burch Creek Roadless area near Ogden, Utah be deleted from the map of inventoried roadless areas. (Individual, Ogden, UT - #A30540.45510)

IN CENTRAL UTAH

In the Central Utah area where I live, there has been considerable road development in the mountains along the Skyline Drive. Today this beautiful area is enjoyed by thousands of camper, hikers and fishermen every weekend. Deer and Elk are abundant and unharmed by the people using the resource. If the Forest Service's rule is put into place, the only way to get into many of those places will be by foot or horseback. A fact that will deny me and thousands of others access to the public lands their taxes pay for. (Individual, Mount Pleasant, UT - #A26116.90000)

959. Public Concern: The Forest Service should not use the maintenance backlog as an excuse to forego road construction.

Much has been made of there being a ***$8 billion total*** maintenance backlog on forest roads, but the DEIS fails totally to explain that this is the result of three circumstances: 1) a severe underfunding and downsizing of the Agency for the last eight years; 2) a result of new, important environmental standards that the Forest Service now has for its roads; and 3) normal degradation as a result of time and use.

To put this in another perspective, the annual cost of maintaining ***other*** public highways is about $150 billion ***per year*** plus another $100 billion ***per year*** is needed for rebuilding (Civil Engineering, May 2000) plus an unknown amount for private roads. And in 1998, the American Society of Civil Engineers estimated that the repair and renewal of America's infrastructure would take **$1.3 trillion.** The Forest Service's $8 billion road need is a minuscule part of that total. The Forest Service also has $5 billion maintenance backlog on Forest facilities, but no one (rightly so) is using that as a justification for advocating closing campgrounds and visitor centers.

The DEIS should point out that the Forest Service is the 2nd largest landowner in the United States (next to the BLM). So the Forest Service's facilities and road maintenance backlogs are a very small, and an expected, part of our country's normal infrastructure needs. We shouldn't stop our roads program, we should start taking proper care of our road systems. And that should mean that the Forest Service should do **appropriate** planning—as compared to no planning as in IRAs, or making blanket road closure statements. (Union, No Address - #A28881.17240)

Do Not Allow/Restrict Road Construction

960. Public Concern: The Forest Service should prohibit road construction in roadless areas.

I do not wish to see any new roads established in either national or state parks. These resources are precious and should remain pristine and free from development of any kind. (Individual, Los Angeles, CA - #A42.90130)

I am in favor of keeping all currently roadless areas in their roadless condition. The majority of public land already has roads, and I, for one, would like to preserve the few roadless areas we still have for backpacking, hiking, and enjoying nature without the disturbances associated with roads. I support a ban on all further road building in roadless areas. (Individual, Reno, NV - #A149.90130)

The Best way to manage roadless areas in order to maintain forest health is to keep these areas ROADLESS and inaccessible to perturbations such as logging and non-point pollution caused by roads. Using roads to enable fire suppression only allows for buildup of forest debris that eventually results in catastrophic fires. Maintaining these areas in a roadless condition allows historic low intensity uses such as hunting. Construction of roads opens these areas up to high intensity use, which can result in stresses to the ecological system. (Individual, No Address - #A621.90130)

I am well aware of how little territory in America is actually "roadless" I put that in quotation marks because even so-called "roadless" areas are riddled with access to vehicles and other. I support any laws that prevent the building of new roads in Public lands or closes already existing roads to vehicle travel. (Individual, Sheffield, MA - #A4297.90130)

BECAUSE ROADS LEAD TO INCREASED ACTIVE MANAGEMENT

Roads lead to development. In a recent trip my wife and I took to the Sequoia National Park, I noted that a development company that has received a contract from the Federal Government has displaced the existing small businesses (condemned as "ecologically unsound" by the Federal EPA) and is in the process of developing a huge hotel complex with a convention center, restaurant, and gift shop. This development is apparently inevitable (and aided by the Federal Government) even in a National Park. The only defense is to not allow commercial development, and this includes roads. (Individual, Santa Barbara, CA - #A504.90220)

BECAUSE ROADS LEAD TO INCREASED NATURAL RESOURCE USE

The public property of the United States has been exploited enough by PRIVATE corporations. Opening the roads will only lead to increased logging and oil drilling—something that court designated president Bush would like. However, the majority of Americans surveyed support the protection of our national resources, and road building is a direct assault on the protection. (Individual, Albuquerque, NM - #A34.90130)

Unless, of course, you are talking about timber, energy and mining companies (TEM) which is a different type of situation from a private landowner. The traffic from the TEM entities would disrupt the wilderness areas and provide access to areas they do not own, but could exploit by virtue of a road being present. I say they give up the land within these areas for the common good, since they get enough tax credits from their other activities. (Individual, Ogden, UT - #A1166.90130)

BECAUSE ROADS LEAD TO EXCESSIVE GATHERING

It is best not to build roads in these places, to leave them remote and not easily accessed. If gathering is allowed in these places on a more primitive level, the resources will not be endangered. For example, when I hike into DNR land with permission to gather bark from Western Red Cedars that have been sold by the DNR to perhaps a shingle or fencing company, I am limited by what I myself can carry out on my own back. This limitation keeps me from gathering in an exploitative manner, selling for profit the raw resource of inner bark. Instead it encourages the value added by my practicing an ancient craft, keeping alive traditional technologies, which have historical and cultural importance. (Individual, Indianola, WA - #A25409.90130)

BECAUSE ROADS LEAD TO INCREASED MOTORIZED USE

Forest roads have proven to be almost worse than over cutting. The best way to ruin an area is to build a road into it. Roads only attract people with their ATVs and 4 X 4s who drive off-road, litter, start fires, spread noxious weeds, and otherwise damage the environment. Roads are also associated with landslides. (Individual, Missoula, MT - #A90.90130)

Roads in our national forests have been extremely harmful to the health of these forests. We don't need ORVs and ATVs chewing up our forests. (Individual, Anderson, CA - #A717.90130)

BECAUSE ROADS LEAD TO INCREASED ILLEGAL ACTIVITY

Roads cause erosion, encourage out-of-season hunting and other illegal activities (including meth labs and marijuana cultivation.) (Individual, No Address - #A470.90130)

Allowing roads to be put in National Forests would just be an invitation to poach. (Individual, Charleston, SC - #A3611.90130)

BECAUSE ROADS PROVIDE AN AVENUE FOR ABUSIVE HUMAN BEHAVIOR

By putting roads into roadless areas is to invite litter, toxic dumping, and trash, from uncaring and/or unthinking people. I am sure the forest rangers, park rangers etc. have seen this all too <u>often</u>. (Individual, Buffalo, NY - #A11029.10110)

Roadless areas make sense. Many roads are maintained at cost and little used, and hardship of access eliminates shooters, beer cans, plastic waterbottles, whatever litter, and firebugs. The ills of maintenance, cut branches, dirt, and rock shoved downhill, soiling watersheds, stop. The immediate environment gains. (Individual, No Address - #A5286.10111)

I wish to voice my support of the National Forest Roadless Area Conservation Rule. There is so precious little "backcountry" left. I live near a national forest—some years ago the Forest Service put culverts in and a primitive road into a pristine area where I used to hike. Now I have seen trash dumped here (old stoves, mattresses), garbage, evidence of a "hill climb" with automobiles, and once even a burning pallet. Keep the roads out! (Individual, Bozeman, MT - #A8188.10111)

Count me in to save the Forest system. I can't believe the way the campers are taking over the land we use to hunt on they go in there set up their tents they leave their trash they put used tires in to the streams they leave their body waste and toilet paper laying around so people step in it and I'm sure the animals don't like it either. (Individual, Lincolnton, NC - #A7407.10000)

I commented extensively on the Roadless Policy over the past three years and wish to see the January 5, 2001 rule implemented. Roading areas brings in invasive species, trash fire hazard (smoking, campfires etc.), and causes erosion which damages riparian areas. Roading areas fragments wildlife habitat and destroys it, and facilitates uses which are detrimental to wildlife (off-road vehicle use and illegal firearm use). Roading areas represents a loss of taxpayer dollars and impairs critical watersheds, as occurred in 1995-96 and loads in the Santain River due to roads [and] logging. In the Willamette National Forest lands closest to Salmon are roaded, so I don't go there—the trash, vandalism, noise and firearm use disgust me. I have hiked in to Mt. Jefferson Wilderness and Opal creek Wilderness and the difference in abundance of wildlife, quiet, beauty, and lack of trash is dramatic and makes the recreational experience worthwhile. Once areas are roaded, the Forest Service must spend even more money maintaining them by trash removal and enforcement of safety laws. (Individual, Salem, OR - #A14529.30100)

BECAUSE INCREASED ACCESS WILL LEAD TO INCREASED NEED FOR RESCUE OPERATIONS

Some examples of problems caused by roads are:

Increased opportunities for violation of forest protective measures (e.g. poaching, illicit logging) with more human ingress into formerly inaccessible areas and increased need for air or ground human rescue operations which may negatively impact natural areas. (Organization, Pritchett, CO - #A21442.50500)

BECAUSE ROADS CONTRIBUTE TO TRAIL DESTRUCTION

Roads destroy more primitive transportation routes—our trail system. Trails are important to animals and humans in remote areas. Our trail system is part of our national heritage—in many cases these trails were developed by the C.C.C.s [Civilian Conservation Corp] and in some cases animals and prehistoric humans actually developed the trail routes. (Individual, Troy, MT - #A1180.90410)

BECAUSE ROADS CONTRIBUTE TO LANDSLIDE DANGER

Roads have also contributed significantly to landslides, endangering person and property. (Individual, Davis, CA - #A6615.90130)

I've seen neighbors swept to their deaths by mudslides due to clear-cuts approved by professional loggers. (Individual, Roseburg, OR - #A4788.90520)

BECAUSE THE DIFFICULT TERRAIN IN MOST ROADLESS AREAS IMPEDES ROAD CONSTRUCTION

Why are the areas that are proposed as roadless areas roadless? If there had been any real significant timber value or mineral value on those lands, the roads would have been built long ago. The simple truth is that those areas where roads have yet to be built are roadless because it was simply too costly and difficult to get roads into those areas. It makes little sense to build expensive roads into areas that are hard to reach when the Forest Service is unable to maintain or repair thousands of miles of failing roads.

I am very familiar with several of the proposed roadless areas in Washington, Idaho and Montana. I have done extensive geologic mapping in several of them as a researcher and under contract with state

governments. It would be a remarkable engineering feat to get a road into some of those areas. Certainly that is the case for the proposed roadless areas in Whatcom County. (Elected Official, Bellingham, WA - #A4955.90130)

BECAUSE THE FOREST SERVICE LACKS THE FUNDING TO MAINTAIN EXISTING ROADS

Roads have a profound effect on the natural landscape and once built interfere with the local ecology indefinitely. As the Forest Service well knows, maintenance costs are huge and the backlog of such costs on existing roads will never be met. It is unwise to build new roads on lands currently designated as roadless. (Individual, Olympia, WA - #A510.90130)

Note that roads are expensive to build and that taxpayers are rarely reimbursed for the many Forest Service roads built for the de facto exclusive purposes of private logging and mining firms. Road maintenance and erosion control measures add to the cost of these roads. Additional helicopters and hiring of pedestrian forest management personnel could be had for similar cost to road construction. (Individual, No Address - #A117.90130)

I am concerned, as a tax payer and voter, that building additional roads into these areas would be primarily at the tax payers expense for the benefit of a few special interests, such as the subsidized timber and mining interests who do not bear the appropriate share of the costs in building, maintenance, and cleanup. The forest service cannot afford to keep most existing roads properly maintained. (Individual, Gallatin Gateway, MT - #A17684.75600)

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)

There are already more roads on the national forest system than can be cared for.

The Department is concerned about building new roads in inventoried roadless areas, when there presently exists a backlog of about $8.4 billion in deferred maintenance and reconstruction on the more than 386,000-miles of roads in the Forest Transportation System. The agency estimates that at least 60,000 miles of additional unauthorized roads exist across National Forest System lands. The agency receives less than 20% of the funds needed annually to maintain the existing road infrastructure. As funding needs remain unmet, the cost of fixing deteriorating roads increases exponentially every year. Failure to maintain existing roads can also lead to erosion and water quality degradation and other environmental problems and potential threats to human safety. It makes little fiscal or environmental sense to build additional roads in inventoried roadless areas that have irretrievable values at risk when the agency is straggling to maintain its existing extensive road system. (Organization, Denver, CO - #A12008.17100)

National forests in Colorado have a multi-million dollar backlog in road maintenance. Where the agency cannot keep its current “assets” in good repair, it makes little sense to permit new road construction in the most remote areas, where road construction is the most expensive. (Organization, Boulder, CO - #A13463.17240)

IN SENSITIVE AREAS

All sensitive areas must be off limits to roads. Some areas (e.g. riparian areas, unstable slopes, and sensitive and degraded watersheds) are simply unsuitable for roads. The needs of disturbance-sensitive species must inform road construction, maintenance and use. (Organization, Arcata, CA - #A1778.45100)

NEAR WILDERNESS AREAS

Roadways near wilderness areas (BWCA) effectively reduce the size of the wilderness even if the roads don't enter the BWCA because they allow faster entry into wilderness which already suffers from heavy use. (Individual, Clear Lake, IA - #A8886.90000)

ONCE INVENTORIED AREAS ARE MAPPED ACCURATELY

Once inventoried roadless areas are mapped accurately, with those areas with roads deleted from the inventory, permanent roads should be prohibited. (Individual, Longview, WA - #A18940.90130)

UNTIL NEW FOREST PLANS ARE IN PLACE

There are over 60,000 of the acres in the GMNF that demand protection. There is a need to be a moratorium on any road building or resource extraction in these areas until the new forest plan is re-written. (Business, Bristol, VT - #A8734.12440)

UNTIL THE AGENCY IS ABLE TO BETTER MANAGE THE EXISTING ROAD NETWORK

At the very least, we should continue a moratorium on all new roads until we do a better job of managing the Forest Service's existing road network. (Individual, Arlington, MA - #A7703.12440)

Allow Trail Construction

961. Public Concern: The Forest Service should construct more recreational trails.

Encourage and build more recreational trails. Trails provide natural barriers and they provide a mechanism to get at a problem area quickly. (Individual, Fraser, CO - #A30203.30000)

962. Public Concern: The Forest Service should allow trail construction.

RATHER THAN ROAD CONSTRUCTION

The best and only acceptable compromise are trails—NOT ROADS! Perhaps, provisions can be allowed for ATVs and horse trails; but nothing more; and, the law does not need to be interpreted for more. (Individual, Geneva, NE - #A15512.90410)

LESS THAN SIX FEET WIDE

Access can be attained with trails less than six feet wide. (Individual, Ketchikan, AK - #A13522.90510)

963. Public Concern: The Forest Service should turn unneeded roads into less damaging trails.

I am writing to urge your support of the protection of roadless areas in our National Forests. From personal experience, there are very few areas in Virginia's National Forests that are not crisscrossed by dirt roads, which specifically erode sediment into streams, badly damaging them as native brook trout habitat. It is a rare mountain hollow in Virginia's National Forests that does not have a dirt road running along next to the stream. Please help protect the remaining roadless areas in my state and turn the unneeded roads into less damaging trails. (Individual, Richmond, VA - #A888.10111)

964. Public Concern: The Forest Service should reroute "problem" trails rather than close them.

With education, local OHV enthusiast partners can identify and help correct problematic routes. To encourage users to be "part of the solution" the Forest Service should be creative in its remedy for troubled areas or trails in roadless and unroaded areas. If it is not possible to "fix" a trail/area problem, then rerouting should be considered a preferred alternative to simply closing the route or area. (Individual, Victoria, KS - #A2874.90000)

965. Public Concern: The Forest Service should establish connector trails.

TO AVOID DEAD-END TRAILS

Connector trails should be constructed to avoid dead-end trails. These systems could provide recreation opportunities for a variety of skill levels. The document and alternative formulation should evaluate all of these sorts of opportunities. (Organization, Helena, MT - #A13226.91211)

966. Public Concern: The Forest Service should construct hiking paths and trail shelters.

RATHER THAN ROADS

It is critical that we prevent more logging roads into our national and state forests and wilderness areas. Our populace is already jammed into overdeveloped urban infrastructures that have decimated local wildlife and fauna. Our national forests need to be preserved for future generations and the existing ecological balances left alone. Road building will lead inexorably to logging and mining these areas. Instead work on developing hiking paths and trail shelters for easier exploration of these wild areas. (Individual, Fort Wayne, IN - #A479.10111)

967. Public Concern: The Forest Service should allow trail users to construct trails.

BECAUSE THE FOREST SERVICE IS UNABLE TO CONSTRUCT THEM EFFICIENTLY

The USFS should stay away from the trail making business. They don't make good trails and their cost is prohibitive. There is no reason trails should be expensive to make—it's the process that's the problem. Let the people that use them make them—they know what they want and they'll do it for 1/10th the price. (Individual, Palmer Lake, CO - #A23361.90420)

968. Public Concern: The Forest Service should work with off-road vehicle users in developing and maintaining trails.

TO ENSURE ENVIRONMENTALLY RESPONSIBLE USAGE AND RIDER SAFETY AND SATISFACTION

Working with OHV enthusiasts the Forest Service can develop long, well-marked, challenging, and aesthetically rewarding trail systems that will hedge route proliferation and trespassing. These trails can be managed and maintained to ensure environmental responsibility as well as rider safety and satisfaction. (Individual, Lawrenceville, GA - #A6172.30200)

Road/Trail Maintenance/Reconstruction

Summary

General Comments – One general comment regarding road/trail maintenance/reconstruction is that the Forest Service should establish a uniform checklist and a clearly defined process to govern road and trail maintenance. According to one Organization, this would allow consistent, scientific direction that could be followed by all partners such as local governments, tribes, communities and forest planning officials.

Funding – A number of respondents say the Forest Service should provide adequate funding for road maintenance; some suggest this could be accomplished by using national highway gas tax funds. Others assert that the Forest Service should eliminate all road maintenance backlogs—by reprioritizing funding or by considering cost-saving measures for maintenance. Some respondents ask the Forest Service to justify its claim that there is an $8.6 billion road maintenance backlog, while others suggest that the Agency tie adequate road maintenance funding to best management practices for timber removal, and that it seek funding for trail maintenance from states.

Road Maintenance/Reconstruction – General comments regarding road maintenance/reconstruction include the request that the Forest Service provide new direction for road maintenance in the Forest Service Manual; that it clarify what road restoration activities will be allowed under the Roadless Area Conservation Rule for roads significantly damaged by natural hazards; that it address road maintenance needs in the Tongass National Forest; and that it sign unmaintained roads indicating user liability. Beyond these more general comments, a number of respondents urge the Forest Service to maintain existing roads—by rerouting roads that are causing damage, by waterproofing needed roads, or by bringing roads up to standard. Some suggest that the Forest Service allow off-highway clubs to maintain roads that counties and states cannot, and that it assist Permit Holders in road maintenance.

Trail Maintenance/Reconstruction – A few respondents offer comment specifically on trail maintenance/reconstruction. Some suggest that the Forest Service should maintain all existing trails in the trail inventory. According to one individual, there should be an on-going trail maintenance program rather than the hit-and-miss funding that seems to have occurred in the past. An Organization suggests that the Agency clear trails early in the year "to ensure maximum availability and reduction of diversion damage caused by routing around obstacles."

Road/Trail Maintenance/Reconstruction General

969. Public Concern: The Forest Service should establish a uniform checklist and a clearly defined process to govern road and trail maintenance.

ABATE of Illinois believes that trail, road, and cross-country health of the forest should be based on standard criteria using a uniform checklist and a clearly defined process that would minimize personal interpretation.

This, along with directives to provide for all types of recreation, would allow strong leadership from local forest planning officials, local governments, communities, tribes and organizations in the design of the forest as well as the application of scientific criteria. (Organization, Naperville, IL - #A20342.13110)

Funding

970. Public Concern: The Forest Service should provide adequate funding for road maintenance.

We strongly feel that the first priority should be given to maintaining existing roads, together with adequate funding for all associated costs connected with allowing access to these roads, such as clean up of illegal dumping and adjacent off road vehicle damage, as well as actual road maintenance and repair.

We are strongly opposed to the building of any new roads in currently roadless areas. Any new road building should be focused in areas previously accessed for logging, etc. As you know, the existing undisturbed forested land that is still available represents only a fragment of what once was. (Individual, Selma, OR - #A1594.45500)

BY USING NATIONAL HIGHWAY GAS TAX FUNDS

I support the proposed use of some National Highway gas tax funds to maintain and upgrade the forest roads. Primary paved existing roads should be brought up to minimum safety standards based upon the road, number of vehicles, terrain, etc. If a condition of receiving the funds is that they can only be used to bring all forest roads up to "common public highway standards", then I oppose the receipt of the funds. I believe this requirement could be used as a way to remove significant roads from the overall system as many of them can't meet the national standards due to narrow width, etc. (Individual, North Bend, WA - #A27321.17110)

971. Public Concern: The Forest Service should eliminate all road maintenance backlogs.

BY REPRIORITIZING FUNDING

The Forest Service should require sufficient maintenance of existing roads and reprioritize funding until all maintenance backlogs are eliminated. New direction for proper maintenance of roads should be detailed in the Forest Service Manual. New roads, both within inventoried roadless areas and in other portions of the national forests, will be needed in the future to accommodate management activities and the needs of society. When carefully designed and maintained on a forest-by-forest level, the benefits of roads will far exceed costs to both the natural resources and the public. (Professional Society, Anchorage, AK - #A21707.17240)

BY CONSIDERING COST-SAVING MEASURES FOR MAINTENANCE

Reducing and eventually eliminating the $8.4 billion debt accrued for national forest road repair should be a major consideration. If the Roadless Rule is amended, the Forest Service might consider cost-saving measures for maintenance such as closing unneeded non-system roads that may exist in the Roadless area in favor of constructing new roads deemed necessary and approved, e.g., for firefighting especially near home sites, fuel removal, and insect control. Also, the Forest Service might consider an exemption for realigning or reconstructing necessary roads in roadless areas if the outcome is less damaging to the environment in the long run. (Federal Agency, Washington, DC - #A28843.17240)

972. Public Concern: The Forest Service should tie adequate road maintenance funding to best management practices for timber removal.

Continue to practice stringent road building standards to maintain wildlife corridors, high quality fish and wildlife habitat and the biodiversity of the forests. The current funding of immediate road maintenance needs identified for repairs is a step in good faith, but annual funding earmarked to road maintenance is an essential component for best management practices. Provide funding that is linked to any timber sale plan to safeguard stricter logging standards set for road building. (Individual, Pelican, AK - #A26552.75600)

973. Public Concern: The Forest Service should justify its claim that there is an $8.6 billion road maintenance backlog.

I find the claim of an $8.6 billion road maintenance backlog to be beyond belief. (Individual, Fruitdale, SD - #A7638.12200)

The analysis needs to rationally explain, inventory, verify and document the so-called "eight billion dollar" road maintenance backlog and the so-called network of "ghost roads." (Association, Salem, OR - #A21754.17240)

974. Public Concern: The Forest Service should seek funding for trail maintenance from states.

If more money is needed to maintain the existing trial system we suggest that you check with the various states affected by your proposal to see if trail maintenance funds are available. The off-road trail fund in Wisconsin has a very good level of funding for such purposes. Closing OHV and ATV trails because of

lack of funding for roads in an inappropriate response to a different problem. (Organization, Portage, WI - #A27773.17100)

Road Maintenance/Reconstruction

975. Public Concern: The Forest Service should provide new direction for road maintenance.

IN THE FOREST SERVICE MANUAL

The Forest Service should require sufficient maintenance of existing roads and reprioritize funding until all maintenance backlogs are eliminated. New direction for proper maintenance of roads should be detailed in the Forest Service Manual. New roads, both within inventoried roadless areas and in other portions of the national forests, will be needed in the future to accommodate management activities and the needs of society. When carefully designed and maintained on a forest-by-forest level, the benefits of roads will far exceed costs to both the natural resources and the public. (Professional Society, Anchorage, AK - #A21707.17240)

976. Public Concern: The Forest Service should clarify what road restoration activities will be allowed under the Roadless Area Conservation Rule.

FOR ROADS SIGNIFICANTLY DAMAGED BY NATURAL HAZARDS

We noted that certain provisions and maps of the proposed rule were vague and required clarification. As an example, it was unclear in the definitions of **road maintenance** and **road reconstruction** if a road significantly damaged by a natural hazard such as an avalanche may be fully restored. Based upon the proposed rule's definitions, it appeared that only minor restoration might be permitted. The permissible activities allowed that are greater than "minor restoration" yet less than "reconstruction" were not clear. (Elected Official, Bridgeport, CA - #A18107.90210)

977. Public Concern: The Forest Service should address road maintenance needs in the Tongass National Forest.

Maintain or eliminate and rehabilitate existing roads: The Forest Service should be focusing future management activities on maintaining the existing road system on the Tongass. Many of these road systems are in desperate need of attention. The countless miles of eroding roadbeds and hundreds of washed out culverts and bridges are causing lasting damaging impacts to our anadromous fish streams. As commercial fishing is the number 1 private employer in the region, I believe Forest Service efforts should focus on undoing the harm done to the resource on which this important industry depends. I don't believe the Forest Service should proceed with any road building at all. Instead roads that are unused or beyond hope of repair should be eliminated and rehabilitated. There is a sufficient backlog of road maintenance and rehab needs on the Forest to keep Forest Engineers busy into the foreseeable future. (Individual, Tenakee Springs, AK - #A1758.90210)

According to a Forest Service report, a serious problem exists with roaded crossing over Tongass fish streams. It revealed the failure of road culverts to allow the passage of juvenile fish (nearly 80% on the trout streams surveyed). The Forest Service is unable to maintain the thousands of miles of roads it has already allowed to be cut through the Tongass. It would make no sense to build more roads until the existing ones can be maintained or removed.

We request that St. James Bay and Pt. Couverden near Juneau receive protection if the Tongass is considered in the roadless policy. (Business, Juneau, AK - #A28683.45621)

978. Public Concern: The Forest Service should sign unmaintained roads indicating user liability.

I suggest as a compromise that road closures be prohibited but stop road maintenance. The roads will soon become impassable anyway, even if their users are allowed to roll off rocks etc. The "Road Closed" sign, which is really a bow to some insurance, a matter of liability, should be replaced by a sign laying liability squarely on the shoulders of the user. We are not children that have to be protected from their own actions. WE will find a way to get unstuck. (An afterthought: if driving over a middle strip of high dry grass represents a real fire danger, some roads may have to be closed after all. In that case it should be seasonal.) (Individual, No Address - #A5286.90000)

Allow Road Maintenance/Reconstruction

979. Public Concern: The Forest Service should maintain existing roads.

BY REROUTING ROADS THAT ARE CAUSING DAMAGE

Existing roads should be maintained to minimize impacts to watersheds. I would suggest that existing roads, where problems exist, that the first option is to reroute, repair, and or resolve the problems as the first priority. I would suggest that these roads be closed only AFTER all other means have been tried to resolve the problems. The roads should be reviewed on an individual basis by the local people. (Individual, Boise, ID - #A5362.90120)

BY WATERPROOFING NEEDED ROADS

Set a schedule to "waterproof" existing needed roads. (Professional Society, Saint Leonard, MD - #A9040.90120)

BY BRINGING ROADS UP TO STANDARD

When reconstructing roads as part of new timber sales make sure they are brought up to standard. (Professional Society, Saint Leonard, MD - #A9040.90120)

You have invited public comment on the proposal to maintain and upgrade current Forest Service roads. As you pointed out in your May 16, 2000, statement to the Senate Subcommittee on Energy and Natural Resources, forest roads, especially when poorly maintained, can have adverse impacts on watersheds. Few marks on the land are more lasting than roads, and many roads in the national forests do not meet current standards for safety and environmental protection. Many of the classified roads have not been properly maintained, and other roads are neither classified nor maintained. Some of them are simply cleared caterpillar tracks into logging areas. (Organization, Deerfield, IL - #A19049.50000)

980. Public Concern: The Forest Service should maintain roads that charge special use fees.

Where residents pay special uses fees for roads, the maintenance should be the responsibility of the Forest Service. (Individual, Marion, NC - #A4691.17120)

981. Public Concern: The Forest Service should allow off-highway clubs to maintain roads that counties and states cannot.

BECAUSE TOO MUCH LAND AND ROADS HAVE BEEN TAKEN FROM THE PEOPLE

There are many off highway clubs that would maintain roads that county and states can't, just for the fun of using. There's just been too much land and roads taken from the people. (Individual, No Address - #A742.45524)

982. Public Concern: The Forest Service should assist Permit Holders in road maintenance.

I think Permit Holders should have FS assistance, in maintaining roads and bridges where the Forest Service dictates the road and bridge design and requires upkeep for FS fire fighting equipment. (Individual, Marion, NC - #A4691.30200)

Allow Trail Maintenance/Reconstruction

983. Public Concern: The Forest Service should maintain all existing trails in the Forest Service trail inventory.

Maintain all existing trails on the forest service trail inventory. (Organization, Helena, MT - #A13226.45400)

AS PART OF A CONSERVATION PROCESS

Part of the "conservation" process can and should be an intensive, on-going trail maintenance program rather than the hit-and-miss funding that line item has received in the past. Statewide OHV programs have certainly proved they can provide a large measure of that stewardship. These programs are currently under-utilized due to political grandstanding and obstructionism by supporters of the Clinton land grabbers. The rule must be significantly revised to address recreation access and recognize all of the potential contributors to partnerships for forest health maintenance. (Individual, Bozeman, MT - #A19102.90410)

984. Public Concern: The Forest Service should clear trails early in the year.

TO ENSURE MAXIMUM ACCESS AND REDUCTION OF DAMAGE

Trails should be cleared early in the year to ensure maximum availability and reduction of diversion damage caused by routing around obstacles. (Organization, Helena, MT - #A13226.90411)

Road/Trail Closure/Obliteration/Restoration

Summary

General Comments – Comments regarding road/trail closure/obliteration/restoration include the suggestion that the Forest Service close all user-created routes until site-specific analysis can be completed to determine what status they should have; that it obliterate non-system roads and trails after they are adequately mapped and to avoid unintentional trespassing; that it work with off-road vehicle groups to avoid unnecessary road or trail closures; and that it provide adequate signs to indicate that a road or trail has been closed.

Funding – According to one individual, the Forest Service should not close roads that it does not have the funding to maintain. This person remarks, "Closures simply shouldn't be an option for a lack of financial resources necessary to regulate proper use of the roads."

Road Closure/Obliteration/Restoration – Respondents offer several different remarks regarding road closure/obliteration/restoration. One business asks the Forest Service to clarify the evaluation process for closing unclassified roads. Others say there should be public participation for the local communities to provide input before choosing which roads to close or obliterate. One association asserts that the Forest Service should not include roads associated with mining activities in the backlog of roads needing to be reclaimed as those are already mandated by other laws that the permittee is accountable for. Additionally, one elected official questions the adequacy of the statement made in the Advance Notice of Proposed Rulemaking

that the existing road system "was largely funded and constructed to develop areas for timber harvesting and the development of other resources." According to this respondent, the Forest Service should recognize that, absent recreational needs, roads built for timber removal could be closed after logging, inasmuch as roads built solely for timber removal do not require the high construction standards necessary for roads which serve recreational purposes.

Beyond these general remarks, some respondents assert that the Forest Service should decommission existing roads. One individual believe that the goal should be to remove as many roads as possible. Another suggests eliminating from the travel plan all roads that are not currently shown on maps. An Organization suggests that the Forest Service clearly state in the Roadless Area Conservation Rule that any road constructed in compliance with the exceptions must be closed and rehabilitated as soon as possible.

Some respondents assert that the Forest Service should not decommission existing roads because access to large areas disperses impact. In particular, states one individual, roads which are main arteries to other areas should not be decommissioned. Moreover, say others, the Forest Service should not use the fact that roads are not maintained properly as an excuse to decommission them because "primitive tracks are more fun to drive than the high-speed routes."

Road/Trail Closure/Obliteration/Restoration General

985. Public Concern: The Forest Service should close all user-created routes.

UNTIL SITE-SPECIFIC ANALYSIS CAN BE COMPLETED TO DETERMINE WHAT STATUS THEY SHOULD HAVE

Further, all illegally-created unclassified routes in roadless areas must be closed until site-specific analysis can be completed to determine whether to remove or decommission the travelway, or to open and classify the travelway as a motorized route or non-motorized trail. 36 CFR 261.10(a) states that "constructing, placing, or maintaining any kind of road, trail . . . on National Forest System land or facilities without a special-use authorization, contract, or approved operating plan" is prohibited. In addition, illegally-created unclassified routes should not be allowed to remain open while that site specific analysis takes place since they were created illegally and are likely to be causing "adverse environmental impact" (NEPA 40 CFR 1506.l (a)(1)). (Organization, Missoula, MT - #A21359.90420)

986. Public Concern: The Forest Service should obliterate non-system roads and trails.

AFTER THEY ARE ADEQUATELY MAPPED

Forest plans should address those activities not already regulated by the existing roadless rule, especially off-road vehicles. These should not be allowed cross-country access in roadless areas. In many cases, trails should also be closed to motorized vehicle use. Non-system roads should be mapped and obliterated. (Individual, Victor, ID - #A20625.90110)

TO AVOID UNINTENTIONAL TRESPASSING

To avoid unintentional trespass in the long run, it is necessary to obliterate all evidence of routes no longer open to OHV recreation. Additionally, it may be helpful to reroute those trails remaining open, to avoid intersections with the closed routes. (Individual, Arroyo Grande, CA - #A19060.90410)

987. Public Concern: The Forest Service should work with off-road vehicle groups.

TO AVOID UNNECESSARY ROAD OR TRAIL CLOSURES

Solutions to problems must be worked out jointly enabling land managers and all interested parties to understand each other's concerns and needs. Joint, multiple meetings would be most advantageous to all concerned. We do not want to see any loss of roads or trails. Land managers have a viable and willing volunteer working force at their disposal—Off-highway Vehicle Users! With Adopt-a-Road programs, Cooperative Management Agreements and Memorandums of Understanding we can, and have accomplished a great deal. As an example: GPSing, rebuilding trails, erecting fences, putting up signs, constructing water bars, water crossings and maintaining roads and trails. (Organization, Bullhead City, AZ - #A12066.15123)

988. Public Concern: The Forest Service should provide adequate signs to indicate that a road or trail has been closed.

If it is necessary to close a route, managers must help motorized recreationists avoid the prohibited trail. In the short-run, signs and notes maps can help users avoid areas newly closed to them. To avoid unintentional trespass in the long-run, it is necessary to obliterate all evidence of routes no longer open to OHV recreation. Additionally, it may be helpful to reroute those trails remaining open, to avoid intersections with the closed routes. (Individual, Victoria, KS - #A2874.90000)

SIGNS SHOULD STATE A LEGITIMATE REASON FOR THE CLOSURE

Utilize consistent trail signing and marking so that the public is not confused. Trails closed unless otherwise marked open are not reasonable. Trails, when closed, should be signed with on official, legitimate reason. (Organization, Helena, MT - #A13226.91110)

Funding

989. Public Concern: The Forest Service should not close roads that it does not have the funding to maintain.

Closures simply shouldn't be an option for a lack of financial resources necessary to regulate proper use of the roads. (Individual, Lake Havasu City, AZ - #A735.17100)

Road Closure/Obliteration/Restoration

990. Public Concern: The Forest Service should clarify the evaluation process for closing unclassified roads.

There is a confusing and at times conflicting issue that the FEIS identifies: Forest Service "classified", system roads vs. "unclassified", non-system roads. Classified, system roads may consist of 385,000 miles, but there are at least 2 to 3 times that many unclassified roads. On the INF there may be one classified road that has been constructed within the IRAs, but there are hundreds of miles of unclassified roads in IRAs. As best as the reader of the FEIS can tell from the maps provided, some of these roads are in areas identified as unroaded portions of IRAs. While the document boasts that "no roads or trails are going to be closed because of these prohibitions" for system, classified roads, that is not the case for non-system, unclassified roads. The document neglects to disclose that since there are many more miles of unclassified roads than classified, that while no roads or trails shall be closed immediately upon signing of this proposed rule, anytime a cause arises (washout, something as simple as a fallen tree, etc.), an unclassified road in an IRA will be evaluated using the criteria set forth in the rule. The criteria prohibit, but are not limited to, reconstruction that increases a road's capacity, service level, or original design function. There is no information provided as to how the baseline data are going to be obtained, how evaluations will occur, and how decisions will be implemented. (Business, Mammoth Lakes, CA - #A30296.45200)

991. Public Concern: The Forest Service should consider public comment before closing roads.

I feel that before any roads either classified or unclassified are closed there should be a period of comment for the local people to air their views and then the decision should be made based on the facts that are presented at these hearings. There have been too many roads closed that would better serve the sportsman if they were left open, and there would be very little adverse impact on the ecosystem if they were left open. Lets get the people who actually use the land involved instead of just the politicians. (Individual, Riverton, WY - #A4722.90120)

The obliteration of roads during "rehabilitation" must be based on local needs and input. (Individual, Oroville, CA - #A17888.15111)

992. Public Concern: The Forest Service should not include roads associated with mining activities in the backlog of roads needing to be reclaimed.

DUE TO THE REQUIREMENTS FOR RECLAMATION UNDER FEDERAL AND STATE REGULATION

Principle nine, "Competing Values and Limited Resources," is very important in our view. Because (as we discuss in more detail in Attachments 4 and 5) mining activities on National Forest lands are required to be reclaimed pursuant to federal and state regulation, the burden of constructing, monitoring, and reclaiming roads on such mining operations is carried by the mine operator. The backlog of roads needing to be reclaimed in the nation's forests, which was cited in the original proposal to justify the Roadless Rule, see, e.g., 66 Fed. Reg.at 3245-46, should not have included roads associated with coal or hard rock mining activities in light of the requirements for reclamation under applicable federal and state requirements as well as the need for the mine operator to post a financial warranty to guarantee reclamation in the event the operator is unable to complete the necessary reclamation task. As such, Forest Service funds need not be used for such roaded activities. Any new Roadless Rule should clearly and distinctly recognize this fact. Any new Rule should also recognize that, to the extent authorized by statute, the Forest Service can (and does) broker consensual agreements among diverse groups regarding mining on National Forest lands. (Association, Washington, DC - #A19636.65320)

Mining on National Forest lands requires compliance with all federal environmental protection statutes such as the Clean Air Act, the Clean Water Act, and the National Environmental Policy Act. In addition, however, coal-mining operations on National Forests lands must also meet the specific mining and reclamation requirements set forth in the Surface Mining Control and Reclamation Act of 1977 ("SMCRA") and its implementing regulations.

SMCRA, itself, contains specific mining and reclamation performance requirements for roads, and SMCRA's implementing regulations include extraordinarily detailed environmental protection performance and design standards for roads. Also, unless the Forest Service requests otherwise, coalmine roads on National Forest lands are not open to the public. Furthermore, costs of construction, reconstruction, maintenance, and reclamation of these roads are borne by the mine operator. Thus, from a Forest Service budget perspective, these roads do not add to the backlog of maintenance costs currently faced by the Agency. (Association, Washington, DC - #A19636.65370)

993. Public Concern: The Forest Service should recognize that, absent recreational needs, roads built for timber removal could be closed after logging.

BECAUSE ROADS BUILT SOLELY FOR LOGGING DO NOT REQUIRE THE HIGH CONSTRUCTION STANDARDS NECESSARY FOR ROADS WHICH SERVE RECREATIONAL PURPOSES

We note that in the Advance Notice of Proposed Rulemaking the statement that the existing road system on National Forest System lands "was largely funded and constructed to develop areas for timber harvesting and the development of other resources" (63 F.R. 4350-01, p.1). However, it is worth noting that these roads were most often built to a higher standard than necessary solely for timber harvesting.

As a result, the local counties' timber receipts were reduced while the Forest Service used these timber receipts to subsidize the other forest uses. To a large extent these forest roads were built to higher standards solely to accommodate recreational uses. Absent these recreational needs the roads would have or could have been closed after logging. (Elected Official, Roseburg, OR - #A11811.90000)

994. Public Concern: The Forest Service should clarify whether certain roads will be closed due to their roadless designation.

THE ROAD NEAR SOUTHERN ARIZONA'S PENA BLANCA LAKE

A small "roadless" dot near Southern Arizona's Pena Blanca Lake looked as though it covered a road below the dam that's popular with birders. When I asked the main Coronado National Forest office, they didn't even know there was a road there. Then I was told it did not impact the road. The Nogales office of the same forest said it thought that road would be closed because it was in a "designated roadless" area. Which is it? I would think Southern Arizona's birders need an answer before they can even submit a comment. (Individual, Tucson, AZ - #A5278.45100)

995. Public Concern: The Forest Service should reconsider decisions that turned specific existing roads into trails.

TRAIL 67

The nameless road to Walker has recently been designated a trail (Trail 67) by the Forest Service. Motorized travel is now prohibited. Hikers, mountain bikers and horses are allowed. This surely must be some kind of joke. First, that road (Trail 67) crosses my property and other private property, just a few hundred feet south of the northern end of the road. The Forest Service has never discussed this with me or any other property owners that I know of. What is even worse is the trail is blocked by a sturdy Forest Service barbed wire fence and locked gate. One certainly wonders how the hikers, mountain bikers and horses are to get to the trail. The Forest Service has indicated that the road may be used for emergencies, but any other motorized travel will result in a citation. I wonder how the Forest Service thinks someone in an emergency is going to get through the fence and locked gate. (Individual, Phoenix, AZ - #A29149.15111)

Allow Road Closure/Obliteration/Restoration

996. Public Concern: The Forest Service should decommission existing roads.

This is a precious resource that we should take extraordinary precautions to preserve, and unless absolutely compelling need arises, we must maintain the status quo. The goal should be to remove roads whenever possible, in an attempt to reclaim some of this precious heritage. (Individual, Santa Barbara, CA - #A504.90310)

Roadless Areas should be kept as is. Many spurs of logging roads ought to be decommissioned to increase wildlife corridors. This decommissioning process would employ locals, and would reduce the ecosystem [damage] done by constructing the roads in the first place. (Individual, Olympia, WA - #A614.90310)

The forest service has more roads that it can possibly maintain. If anything they should be spending their time closing roads not building them. Roads are a proven detriment to fish and wildlife; erosion from poorly maintained roads is one of the worst legacies the forest service has left us with. Will that situation be improved if we build more roads? (Individual, Amasa, MI - #A793.90310)

Gate and close more of the existing roads. (Individual, Corbett, OR - #A11196.90310)

997. Public Concern: The Forest Service should eliminate from the travel plan roads that are not currently shown on maps.

There are also many roads that are not currently shown on the maps and I would encourage these be considered for elimination in the travel plan. These roads have been created at an alarming rate in the past few years by all-terrain vehicles. (Individual, Helena, MT - #A5394.10155)

998. Public Concern: The Forest Service should clearly state in the Roadless Area Conservation Rule that any road constructed in compliance with the exceptions must be closed and rehabilitated as soon as possible.

As the rule currently stands, we request that clarifying language be added to the rule that states that any road constructed in compliance with the exceptions must be, as soon as practicable, closed, ripped, recontoured and rehabilitated. In addition, roads built in compliance with the exceptions shall not be used to preclude a roadless area from consideration for Wilderness designation or other protective management prescription. (Organization, Missoula, MT - #A21359.90130)

Do Not Allow/Restrict Road Closure/Obliteration/Restoration

999. Public Concern: The Forest Service should not decommission existing roads.

This is our land so leave the roads in for us to enjoy it. Closing roads off because of the man-hating Green movement is equal to socialism. This is America our tax dollars pay to maintain the forest and to use it. Leave all the roads open. (Individual, Houghton, MI - #A70.90320)

While I'm not in favor of building new roads without a complete and thorough review, existing roads should be kept open and monitored. DO NOT CLOSE ROADS. (Individual, Lake Havasu City, AZ - #A735.90320)

ROADS THAT ARE MAIN ARTERIES TO OTHER AREAS

While it is important to allow equal access to our national heritage of the land, I feel it is equally important to consider the whole value of our lands. I have hunted, fished and camped on many tracks of national lands and can say without any reservation that I will return. The best example is the track of national forest in the Little Belt Mountains of Montana. There were many acres that were accessible only by primitive methods of beast and or human power. But to get to these were well maintained gravel roads that were used as jump-off points into those roadless areas. I would support a policy similar to this. One that has a main artery that allows access to those jump-off points to our national heritage—the land. (Individual, Santa Maria, CA - #A3981.91110)

BECAUSE ACCESS TO LARGE AREAS DISPERSES IMPACT

Not all roads need to be maintained, and different road classifications can easily be instituted. Roads should never be closed, except for temporary management purposes. Common sense suggests that allowing access to the largest area possible spreads people out and creates the least amount of impact on any one area. (Individual, Loveland, CO - #A7090.15168)

IN ASSOCIATION WITH OTHER ACTIONS

Trail closures should not be associated with other actions including timber sales, mining, and livestock grazing. Corrective action should be taken where trail closures in the past have resulted from these sorts of past actions. Loss of motorized trails as a result of past timber sales should be mitigated by connecting old and new travel ways to create a loop system. (Organization, Helena, MT - #A13226.91211)

1000. Public Concern: The Forest Service should not use the fact that roads are not maintained properly as an excuse to decommission them.

As for the argument that many of these roads are not maintained properly or that there isn't the funding for maintaining roads just doesn't hold water with me. I have been a user of many "back country roads" in Colorado since the early 70s. There has been little to no maintenance done on these roads during that time and the areas have not suffered from it. (Individual, Boulder, CO - #A4480.45500)

BECAUSE PRIMITIVE TRACKS ARE MORE FUN TO DRIVE THAN HIGH-SPEED ROUTES

However, please don't forget that driving on the national forests is one of the most popular of recreation activities. This doesn't required high road standards. In fact, primitive tracks are more fun to drive than the high-speed routes. Don't assume a road should be obliterated just because it isn't high standard. Many of these routes require little maintenance and are causing no significant resource damage. Find out what the user public thinks before embarking on any more road obliteration initiatives. (Individual, Boise, ID - #A5165.90000)

1001. Public Concern: The Forest Service should remove all gates on federal land.

Take out all Forest Service gates. (Individual, No Address - #A18775.90100)

1002. Public Concern: The Forest Service should not obliterate bridges.

WHERE ROADS ARE ALREADY PRESENT

No more roads, and don't tear down bridges with roads already there. (Individual, Wapiti, WY - A7385.90130)

Natural Resources General

Summary

General Comments – Management of natural resources is a topic of comment to a number of respondents. Numerous individuals urge the Forest Service to responsibly manage natural resources—as an impartial advocate for the public good; to protect areas not yet damaged; to preserve resources fundamental to our survival, such as water and air; and to sustain the population and ecological balance of the planet. On a similar note, a number of respondents urge the Forest Service to make sound resource management decisions based on science, on expert opinion, on new technology, and on best management practices. Some individuals suggest specifically that the Forest Service should promote future sustainable yields in management of roadless areas—by implementing sustainable management practices; by defining areas where sustained yield will be the management objective; by harvesting areas that have already been cultivated; or by shifting to forestry practices outlined by the Pacific Northwest Research Station.

One of the most common assertions is that the Forest Service should seek to prevent further degradation of roadless areas and natural resources. Respondents suggest that further degradation can be prevented by encouraging conservation and recycling, and by developing alternative forms of energy. A number of individuals remark that there is no justification for natural resource development in roadless areas anyway inasmuch as these areas account for very little of the nation's timber, oil, and gas resources. Further, assert some, allowing resource uses only sets the precedent for more commodity activities.

One association is concerned that the Roadless Area Conservation Rule would make it difficult to meet resource requirements for the future. According to this respondent the present and future

national consumption need far out strips what the national forests can supply, a product they are suppose to supply. This person believes the Forest Service can meet the challenge but not without professional active management of all lands.

Adequacy of Analysis – One organization suggests the Forest Service evaluate the cumulative impacts of road closures on such things as fire and timber management and firewood gathering. According to another respondent, the Agency should determine when land use activities are approaching the management threshold in forest plans in order to ensure resource sustainability and maintenance of land management continuity.

Funding – An individual suggests the Forest Service fund the development of better technology in order to aid in resource conservation.

Natural Resource Management – Some respondents comment that, in general, natural resource management should be allowed. A few respondents assert that resource management activities should be carried out with temporary roads which are closed and revegetated following completion of work. According to others, the Forest Service should allow regulated removal of forest products which does not require road building or inflict environmental damage, such as ginseng and morel harvest. Respondents who state that natural resource management should be allowed, however, direct their comments to specific activities; these comments will be summarized in the sections to follow.

Of those respondents who address natural resource management, a number believe that it should be prohibited or restricted. Respondents state that the Forest Service should prohibit active management in roadless areas—because of public support for the Roadless Area Conservation Rule; because commodity use and exploration and wilderness preservation are mutually exclusive; because of the need to act for the long term; and because of the intrinsic value of forests. Some individuals suggest, moreover, that commodity production is not the best use of public lands. One individual believes that society has decided that these lands should be used to preserve and recreate on, not as a commodity resource. Finally, some say that the Forest Service should encourage the development of environmentally sound alternatives to logging and mining, and should close land previously opened to commercial interests.

Natural Resources Management General

1003. Public Concern: The Forest Service should responsibly manage natural resources.

AS AN IMPARTIAL ADVOCATE FOR THE PUBLIC GOOD

The role of the government should be as a dispassionate and impartial advocate for the public good. Exploitation for the enrichment of individuals or corporations should not be permitted. As much as possible the role of the government in the management of these resources should be shielded from the transitory political whims of unscrupulous politicians. (Individual, No Address - #A460.12100)

TO PROTECT AREAS NOT YET DAMAGED

As a former employee of the Idaho State Department of Lands, I am well aware of the need to maintain already constructed roads, but it is up to the government to protect the areas of the United States not yet damaged by the incursions of the timber and mining industry. (Individual, Bismarck, ND - #A139.12100)

TO PRESERVE RESOURCES FUNDAMENTAL TO OUR SURVIVAL

These concerns have resulted in federal legislation like the Clean Water and Air Acts, the Endangered Species Act, now the Roadless Rule because local and state entities tend to deplete resources for their own specific economic needs, ignoring the long-term and cumulative impacts to the environment as a whole. Resources such as forests, water, and air cross local and state boundaries and overuse by one entity usually negatively impacts citizens in another area. Since these resources are fundamental to the survival of us all, they have become and should continue to be regulated by the federal government. (Individual, Klamath Falls, OR - #A1035.12100)

TO SUSTAIN THE POPULATION AND ECOLOGICAL BALANCE OF THE PLANET

I am not opposed to use of our natural resources for the public good. But this should be done without any more damage to the natural environment that is left on this planet. The days of unabated clear-cut logging, strip mining, irresponsible drilling, and the use of dangerous chemicals to extract resources from the land are OVER and people still doing any of these things need to be prosecuted and removed from that industry. The ecosystem cannot take anymore and still sustain the population and ecological balance of the planet. (Individual, Bonita Springs, FL - #A1718.65000)

BY MANAGING NON-WILDERNESS LANDS WITH VARYING DEGREES OF INTENSITY, DEPENDING ON RESOURCE POTENTIAL

Non-wilderness lands should be managed with varying degrees of intensity depending on timber growing potential and other non-timber uses and values. (Individual, Evergreen, CO - #A19178.65200)

1004. Public Concern: The Forest Service should make sound resource management decisions.

BASED ON SCIENCE

In this community, fear of wildfire is understandably great. It is also manipulated by industry to whip people into a frenzy of believing wildfire is best avoided by logging. Again, I believe the Forest Service must implement science-based fire management plans (which I believe they are doing) and offer educational outreach on this topic to counter the hysteria that industry promulgates. A significant part of such education should be the urging of communities and individual homeowners to take responsibility for protecting themselves against wildfire. (Individual, Portola, CA - #A695.30000)

How should inventoried roadless areas be managed to provide for healthy forests, including protection from severe wildfires and the buildup of hazardous fuels as well as to provide for the detection and prevention of insect and disease outbreaks?

Use common sense. We should continue to address these issues with science, speed, and efficient decision-making processes. People want Roadless areas protected, but if you need to build a road to solve a problem that, unchecked, might destroy the whole area, then people will want you to do that. There's enough flexibility built into Roadless to address these issues with the best solutions available. (Individual, Meridian, ID - #A1683.30000)

BASED ON EXPERT OPINION

This is a decision that needs to be made by experts in maintaining wilderness areas, and not by foresters eager to harvest public land. Nor by corporations eager to spend tax dollars to assist in making money for their personal gain, and not by politicians looking for payoffs from corporate coffers for their election campaigns. The January 12th rule as documented contains exceptions and clarifications for this question. (Individual, Portland, OR - #A3660.30000)

BASED ON NEW TECHNOLOGY

The IRAs should be protected with as much priority as they are now. New technologies, methods, and science should continually be applied to improve the protection. Public-awareness of the issues and problems is the best tool we have to keeping and improving the health of our forests. Ultimately, every decision regarding development and usage of our forests is based on that awareness. (Individual, No Address - #A594.30100)

Where logging is allowed, it should be done with Best Available Technology minimize the impact of such cutting. People who log in a destructive way (generating water pollution, poorly constructed roads, failure to follow aesthetic guidelines for ridge cutting, etc.) should be thoroughly punished and prevented from making a living this way.

There is good logging and bad logging. Logging that permanently scars a mountain is BAD logging. Take a look at Cheat Mountain in West Virginia; it is all cut to pieces from logging in the first half of this century. No regard was given to the lasting damage that was done removing spruce logs from the area. The folks that did that logging did not really know any better. The better class of loggers today DO know how to do a minimum impact job in the woods. Best practices should be more than "suggested," especially on Federal lands. (Individual, Covington, VA - #A5294.65280)

BASED ON BEST MANAGEMENT PRACTICES

Any 'management' should be based on best forestry practices as determined by science and not economics. (Individual, Tucson, AZ - #A872.30100)

1005. Public Concern: The Forest Service should promote future sustainable yields in management of roadless areas.

BY IMPLEMENTING SUSTAINABLE MANAGEMENT PRACTICES

There is plenty of information that already exists on how to sustainably manage forests (for example, the Forest Stewardship Council certification program.) I would encourage you to explore these resources for ideas on how to better manage the areas of our forests that remain open to the harvesting of natural resources. Implementing sustainable management practices is a win-win situation—it will benefit both industry and the people of the United States. (Individual, Detroit, MI - #A1429.65280)

BY DEFINING AREAS WHERE SUSTAINED YIELD WILL BE THE MANAGEMENT OBJECTIVE

Define areas where sustained yield will be the management objective. (Individual, Kalispell, MT - #A3380.65270)

BY HARVESTING AREAS THAT HAVE ALREADY BEEN CULTIVATED

Sustainability means logging areas that have already been cultivated. We do not need to log every last stand of old growth. Let's leave some of our forests pristine for future generations. These forests belong to all of us, not just powerful timber and mining interests. (Individual, Portland, OR - #A1489.65220)

BY SHIFTING TO FORESTRY PRACTICES OUTLINED BY THE PACIFIC NORTHWEST RESEARCH STATION

The Forest Service already manages a huge matrix of forest roads and second growth forests. These forests should be used to continue to produce the types of wood and forest products that our country depends on. Also, the Forest Service should shift to sustainable alternative forestry such as has been outlined by your Pacific Northwest Research Station. (Individual, Olympia, WA - #A580.65230)

1006. Public Concern: The Forest Service should prevent further degradation of roadless areas and natural resources.

Roads bring in people to use up the nonrenewable resources in ways that destroy the earth, such as logging, mining, building malls and developments. There should be areas where these things can be strictly kept out. (Individual, Berkeley, CA - #A497.65000)

This rule is not extreme - 70% of our national forests have already been roaded, logged, mined, and otherwise exploited for the short-term profits of the logging, mining, and fossil fuel industries, with taxpayers footing the bill for the road constructions. (Individual, Salt Lake City, UT - #A1325.65000)

The appropriate role of local forest planning as required by NFMA is to safeguard the treasures of natural-world's resources from creeping, universal, ocean-to-ocean-Canadian-border-to-Mexican-border industrialization. (Individual, No Address - #A536.65000)

BY ENCOURAGING CONSERVATION AND RECYCLING

Enough is enough, if we need resources, let's conserve, it's the only sustainable way to do things, and it will have to be done sooner or later, may as well do it before destroying the environment and losing our 'national treasure' or whatever term is used by politicians. (Individual, Santa Rosa, CA - #A4421.65000)

Why can't the government concentrate on getting more recycled materials to the public and stop allowing the continuous harvesting of the virgin forests? (Individual, Byron, CA - #A1311.65200)

I beg you to support recycling. Construction materials, which are made of recycled materials, are available and could replace much of the lumber we now use. (Individual, Castroville, CA - #A4167.65290)

I drove through Northern and Central California and Southern Oregon and witnessed the clear-cutting that the logging industry does to the hillsides and mountainsides of forests. Despite the claim that "they will grow back" the areas are still bare because baby trees need larger trees to shade them and retain the soil so they can get a healthy start. So yes, once they are gone, they are gone forever. I see no need to strip what is left of our forests to satisfy the insatiable demands of indulgent consumers. What this country needs to do is plan for recycling and put it into effect, everywhere. There are many alternatives to destroying our forests and the ecological balance they provide. Let the public outcry be heard before it is too late to save the planet. (Individual, Cowan, TN - #A4177.65290)

I have seen devastating clear-cuts from the air over the Pacific Northwest, in the Inland Passage of Alaska, and in Idaho and Montana. The remaining forests need to be logged sustainably, which can be done if we cut back on logging and reuse/recycle, and conserve paper and wood products. For example, I am reusing an envelope to send this letter. The envelope may look tacky, but not as bad as a clear-cut. (Individual, Davis, CA - #A5154.65270)

BY DEVELOPING ALTERNATIVE FORMS OF ENERGY

I strongly support research and development of alternative forms of energy. Solar and thermal energy seem to be likely candidates. Technology in hybrid cars also seems to be a much better alternative to exploiting our wild lands. (Individual, No Address - #A4431.65000)

Obviously our current energy supply is a finite system, and we need to develop alternatives. Let's not destroy the little that we have left because we do not want the responsibility of changing our ways . . . (Individual, Normal, IL - #A328.65300)

Take for example drilling for oil in the Artic National Wildlife Refuge. The fact is we need to develop alternate types of energy, not drill in the last wild places. Once the oil is gone there, then what? This is the same for old growth forests. Loggers cry they need to log this last small % of old growth that is left. Why? Once they finish logging it at the end of five years time, then they are right back where they started, with no old growth forests to log! So then what do they do? Now is the time for miners and loggers to adjust to a new way to support themselves, before the old growth forest is gone. Now is the time to make our sustainable forests even better. Now is the time for Americans to look to the future and face the reality of finding different ways of life from logging, fishing, mining and drilling. (Individual, Port Angeles, WA - #A3672.65230)

Oil and gas resources are very limited in roadless areas. Based on an analysis by the US Geological Service, six of the states' roadless areas hold only 0.4% of the nations oil reserves, thereby demonstrating that the full costs of drilling outweighs the benefits. Hurting our protected land now for any "quick fix" would only hurt the nation more in the long run. Instead, conservation and alternative fuel sources, such as gas/electric hybrids and the like, should be emphasized. (Individual, No Address - #A928.65300)

If we use current technology wisely we will never have to cut another tree or drill another hole in the ground to obtain energy. Hydrogen, as an energy carrier can supply all of the energy we need without pollution and the environmental hazards of using oil, coal or natural gas. Let's stop the insanity and convert now. (Individual, Vestal, NY - #A3913.65300)

The current administration is beholden to big oil, the forest industry and the mining industry for their election. Only about six percent of the US timber comes from our national forest. The forest industry is determined to get the rest. And why must we pump the last barrel of oil when the handwriting is on the wall concerning our future energy sources. Worldwide the fastest growing source of energy for electricity production is wind. At Arlington, Wyoming stand 133 wind turbines and they currently produce enough electricity to supply most of western Wyoming. There are thousands of sites for wind farms in Wyoming and the nation. With only 66 turbines the wind farm at Arlington can supply the needs of Cheyenne, our largest city. Antelope and cattle graze beneath the turbines. The turbines are big and do not spin at speeds that will kill birds. In fact, the Arlington turbines have not killed any birds. This summer BMW and Honda introduce their hydrogen-powered cars. The exhaust is water. Wind and sun produced electricity can produce hydrogen from water in the process of electrolysis. The large envelope passive solar home of Vincent and Joyce Sindt in west Laramie, one of the coldest towns in the US, used $26 in backup electricity and two cords of wood in heating the home for two years. In Japan and at other locations, solaria on the south sides of some homes supply all of the heat needed by the homes. On the edges of the window glass through a reverse meter into the power grid and the homeowners collects a fee for the electricity the home produces. In many climates solaria and windy ridges can be our power plants. We can save the Arctic Wildlife Reserve, the intact national forests and watch atmospheric carbon dioxide return to the level that sustains our stable climatic condition. Save our roadless areas. (Professional Society, Laramie, WY - #A6282.65300)

1007. Public Concern: The Forest Service should provide national oversight of forest management.

IN DECIDING WHERE TIMBER SALES AND OTHER COMMERCIAL OPERATIONS CAN TAKE PLACE

I believe that local districts should be involved in protection and management, but that there needs to be significant national oversight in deciding where timber sales and other commercial interests can take place. I believe this is too political and economic of an issue to be decided locally. (Individual, Fairhaven, MA - #A19657.13130)

1008. Public Concern: The Forest Service should consider that roadless areas account for very little of the nation's timber, oil, and gas resources.

Roadless areas provide less than .2% of the nation's timber supply and less than .4% of the nation's oil resources and .6% of natural gas resources. The rule has no impact on access to inholdings and no impact on the large areas of the National Forest that are already roaded. The rule will only protect the remaining 31% of the National Forests, which have been preserved thus far because of topography, lack of economic resources, recreational benefits, and wildlife and watershed values. These forests comprising 31% of the National Forest should be preserved for future generations. (Individual, Seattle, WA - #A8230.10150)

Protecting roadless areas will not have a significant impact on the nation's energy supplies. Roadless areas in the Rocky Mountains are not a major source of oil and gas; these areas contain only four-tenths of one percent of America's oil resources and six-tenths of one percent of America's gas resources. (Individual, The Plains, VA - #A6201.65000)

Roadless areas provide less than two-tenths of one percent of the U.S. timber supply, four-tenths of one percent of the U.S. oil resources and six-tenths of one percent of U.S. gas resources. (Individual, Valley, WA - #A6278.65241)

The national forests provide only 5% of our timber and less than 5% of that comes from the proposed roadless areas. The Roadless Rule affects less than one-quarter of 1% of the nation's timber supply. (Individual, Wasco, CA - #A1663.65241)

The commodity values in roadless areas are not significant. Roadless areas provide less than two-tenths of one percent of the nation's timber supply, and commercial logging of roadless areas would require large taxpayer subsidies. Similarly, 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. (Individual, Markleeville, CA - #A1067.45100)

To answer this question, I would like to quote previous Forest Service Chief Mike Dombeck from his January 5, 2001 speech "Roadless Area Conservation: An investment for Future Generations": "We presently supply less than 4 percent of the nation's timber from all of our national forestlands combined. Of that modest 4 percent only a tiny fraction - 6 percent - will be affected by roadless area conservation. That's one quarter of 1 percent. Similarly, National Forests supply less than 4 tenths of one percent of the nation's oil and gas, and far less from roadless areas. Is it worth one-quarter of 1 percent of our nation's timber supply, or a fraction of a fraction of our oil and gas to protect 58.5 million acres of wild and unfragmented land in perpetuity?" (Individual, Laramie, WY - #A1.45100)

1009. Public Concern: The Forest Service should recognize that allowing active management sets the precedent for more resource removal.

In a country that is based strongly on capitalism, a movement to build roads and allow logging and other industries that take resources from these forests could very easily turn into a stepping stone for other industries to move into such areas. History has proven that wealthy corporations and industries tend to get their way over a long period of time of pushing an issue with their money. This issue should have nothing to do with money. (Individual, No Address - #A30028.15000)

1010. Public Concern: The Forest Service should support legislation that regulates natural resource consumption.

People need to realize that resources are precious, and the only way to do this is through laws that limit their consumption. (Individual, No Address - #A6795.65000)

1011. Public Concern: The Forest Service should reach decisions on development proposals in a timely manner.

Lander County would encourage the Forest Service to expedite all development proposals along the timeframes needed to push through the rule. The evaluation of the rule under the NEPA process showed that the Forest Service is capable of completing an EIS within a year. We hope that all current and future mining, timber and other resource development are afforded the same swift and decisive action. (Elected Official, Battle Mountain, NV - #A27730.14420)

1012. Public Concern: The Forest Service should limit active management while accommodating reasonable local practices.

The appropriate role of the local forest-planning unit, such as yourself, is to adhere to the national rules IN SO FAR AS POSSIBLE. While you must work hard to avoid any piece-meal, local changes that could have long range damaging effects, you also have to do what is necessary to accommodate some local quirk. For example, while no new roads should be built into these areas, if they already have an old logging rail line that the snowmobilers have been using for decades, you should not try to close it. Rather, you might want to clean it up a little so that it becomes a more effective firebreak, but not enough to encourage anyone with a 4 x 4 PU to go roaring down it. In other words, limit development as much as possible but accommodate reasonable local practices. (Individual, Hudsonville, MI - #A4928.15111)

1013. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule will make it difficult to meet resource requirements for the future.

The rule is the result of a well orchestrated but ill-conceived effort by preservationist groups to dictate land use allocations of unfamiliar real estate. It not only is a mockery of the basic premise of N.E.P.A, it violates the concepts inherent in the Forest and Rangeland Renewable Resources Planning Act. (i.e. "the nation maintains a conservation posture that will meet the requirement of our people in perpetuity.") Conservation is in opposition to preservation. The U.S. population is predicted to double by the year 2050 and our national forests are expected to provide raw material for the populace. The forests can meet this challenge but not without professional management, unmanaged lands will produce nothing for future generations except major fuel bodies to create conflagrations such as are occurring now. (Association, Eureka, CA - #A17718.10141)

1014. Public Concern: The Forest Service should monitor resource use.

Resource extraction should be monitored to have the least impact—such as buffer zones next to rivers and lakes. A team approach to resource extraction such as wildlife biologists having critical in-put and power over industry would be a start. I keep hearing "sound science", but it seems the scientists are always hushed when industry wants their way on our public lands. (Individual, Tustin, MI - #A5276.14500)

MAINTAIN ACCESS SO THE PUBLIC CAN MONITOR RESOURCE MANAGEMENT

The USFS published a recreation agenda in 2000. It is almost never mentioned. It is like the agenda does not exist. We feel as motorized recreational users of the forests that this must have been printed to pacify us and nothing is really going to change. One thing about rules like the Clinton-Gore roadless rule is, if you lock people out, they can not see how their natural resources are being mismanaged. (Organization, Okanogan, WA - #A6026.65000)

1015. Public Concern: The Forest Service should develop a national roadless rule.

BECAUSE IT WILL STIMULATE NEW INDUSTRY INNOVATIONS

I believe conservation is ultimately the best approach to take, protecting natural resources can stimulate new innovations in industries that otherwise would damage or destroy environments. (Individual, No Address - #A8998.10110)

Adequacy of Analysis

1016. Public Concern: The Forest Service should evaluate the cumulative impacts of road closures.

ON FIRE AND TIMBER MANAGEMENT, AND FIREWOOD GATHERING

The environmental document must evaluate the impact that the proposed motorized road and trail closures will have on fire management, home heating, and timber management. The environmental document must also include an analysis of the benefits to the public from the gathering of deadfall for firewood from each of the roads and trails proposed for closure. These analyses are especially significant following a devastating fire season and a period of rising energy costs. The closure of roads and trails is occurring at a large scale throughout the national forests. Therefore, the environmental document must evaluate the cumulative impacts of motorized road and trail closures on forest fire management, timber management, and firewood gathering. (Organization, Helena, MT - #A13226.65290)

1017. Public Concern: The Forest Service should determine when land use activities are approaching a management threshold.

A THRESHOLD ESTABLISHED IN THE FOREST PLAN TO ENSURE RESOURCE SUSTAINABILITY AND MAINTENANCE OF LAND MANAGEMENT CONTINUITY

Further, we are opposed to providing "opportunities for the involvement of others, mainly the general public, in monitoring and evaluation" activities. We do not object to promoting and seeking stronger coordination with other federal agencies, state, local and tribal governments, in fact we encourage it as a means of streamlining the planning process. However, the FS is overstepping reasonableness by depending upon those without express technical expertise in the issues, i.e., scientific and academic communities and "other interested parties," to conduct monitoring activities that are the responsibility of the FS. Asking the public and academia to participate in monitoring procedures will merely invite controversy and increased polarization. We recognize that the FS is attempting to offer added opportunities for involvement in managing the NFS, but active participation by these entities will complicate and delay the process. We urge that the FS adopt the means for determining when land use activities are approaching the management threshold established in the plan to ensure resource sustainability and land management continuity are maintained. As such, integrated monitoring must be done on all resource activities to get a true picture of actual cumulative effects. It is crucial for the FS to avoid responding to new development proposals with knee-jerk reactions to halt all activity pending completion of a new environmental impact statement. With improved monitoring activities, the FS will improve its resource database and should not be taken by surprise. (Business, Denver, CO - #A25688.65300)

Funding

1018. Public Concern: The Forest Service should fund the development of better technology.

TO AID IN RESOURCE CONSERVATION

Please spend the money on better technology, not more drilling. There must be a way to build more efficient engines and not promote SUVs for everyday city driving. I find it hard to believe in today's day and time, with human cloning being a possibility, that we cannot do this. It is sad that we are going to totally deplete our planet of its resources and animals all in the name of money. Haven't we done enough? How greedy do we have to get? (Individual, Houston, TX - #A10360.50100)

Allow Active Natural Resource Management

1019. Public Concern: The Forest Service should construct temporary roads for resource management activities.

Helicopter, cable or forwarder removal of timber is not feasible or practical in the vast majority of cases where timber needs to be removed, temporary roads and skid trails should be allowed so that the Forest Service can prudently manage the resources under their jurisdiction. After the work is completed, the temporary roads and skid trails should be closed and planted to minimize erosion and enhance wildlife habitat. (Organization, Edgefield, SC - #A4829.90120)

Inventoried roadless areas are unique only in that they were inventoried during the wilderness study era. I do not believe that all Forest Service land needs to have a permanent road system but I do believe that it is a crying shame to allow resources to go to waste due to the lack of management (wood fiber to burn or rot due to disease). The practice of constructing temporary roads for management activities and putting them to bed after it is used is a much-underused practice. (Individual, Dayton, WY - #A5074.90121)

1020. Public Concern: The Forest Service should allow regulated removal of forest products.

WHICH DOES NOT REQUIRE ROAD BUILDING OR INFLICT ENVIRONMENTAL DAMAGE, SUCH AS GINSENG AND MOREL HARVEST

Allow recreational activities and regulated harvesting of forest products that do not require road building or inflict major damage on the environment. Example, ginseng permits, morel permits, harvesting of seeds for propagation of native plants, etc. (Individual, No Address - #A23569.90100)

Do Not Allow/Restrict Active Natural Resource Management

1021. Public Concern: The Forest Service should prohibit resource removal in roadless areas.

Protecting roadless areas in our national forests is so basic an idea. There was ample scientific, moral and environmental reason for the rule to be passed in the first place. Lets not buckle now to industry after much hard work has already been done. It's on your conscience. What kind of country we leave for our children. Please do the right thing. (Individual, Kittery, ME - #A4852.10111)

Please respect the voice of the people, not the voice of industry. Roadless lands are the few lands left in America where human development does not dominate the landscape. The value of these lands for wildlife, natural processes, ourselves and our children are immeasurable. In an increasingly developed world, roadless areas will only become more and more important to our well being and that of the planet. (Individual, Missoula, MT - #A5313.10111)

BECAUSE OF OVERWHELMING PUBLIC SUPPORT FOR THE ROADLESS AREA CONSERVATION RULE

I was greatly relieved when the Roadless Area Conservation Rule was established, and very frustrated to hear that it's now in jeopardy. I believe it was strongly supported by a wide variety of people, and that support has not changed. Perhaps the current administration believes that circumstances have changed that necessitate alterations. But circumstances certainly haven't changed enough to make it a good idea to open the last of America's wild national forests to drilling, mining and logging. Please weigh carefully the overwhelming support for the protections that were put in place in January, and resist the temptation to yield to industry pressures. The decision is a critical one. (Individual, Westford, MA - #A366.10110)

We and millions of other Americans want a stop put to the destruction of our remaining natural areas, and we have demonstrated that desire time and time again. I hope the responses the Forest Service receives from individual American citizens about this unnecessary and redundant public comment period convince the Forest Service that we are serious—protect the roadless areas from any further development and exploitation. (Individual, Macomb, IL - #A95.10111)

Please, please preserve the Forest Service's Roadless Area Conservation Rule as it now stands. The roadless area conservation rule represents the desires of the American people, and to alter it in order to please a small number of business elites would be criminal. (Individual, Davis, CA - #A170.10111)

BECAUSE INDUSTRIAL EXPLORATION AND WILDERNESS PRESERVATION ARE MUTUALLY EXCLUSIVE

Please support the Forest Service's Roadless Area Conservation Rule. No amendments, alterations, or exceptions of this policy should be allowed.

Surely you are aware that this policy, as it now stands, is the result of more than 600 public hearings and 1.6 million public comments, 95% of which support the strongest protection. The wishes of the American people to protect our natural resources must not be ignored in favor of corporate profits or government alliances.

In the words of the Heritage Forest campaign, the rule represents a balanced approach to forest conservation, saving the last 30% of America's wild national forests from logging mining, and drilling—activities already allowed on most national forest lands. Industrial exploration and wilderness preservation are mutually exclusive goals; therefore, we must protect our national forests and conservation spaces from industry exploitation. To alter or dismiss the Roadless Area Conservation Rule would be to allow, indeed to encourage, the very exploitation that Americans have unequivocally shown they do not desire. Furthermore, the Roadless Area Conservation Rule already adequately addresses issues of fire management, forest health, access, and local input. (Individual, Conyers, GA - #A342.10150)

BECAUSE OF THE NEED TO ACT FOR THE LONG TERM

It is a great privilege to live in Oregon, where undeveloped public lands are so easily accessible. The forests near the Columbia River Gorge, on Mount Hood, in the Gifford Pinchot, the Cascade Mountains, the Deschutes, Fremont or Malheur National Forests, the Eagle Cap wilderness of the Wallowas and the botanically rich Siskiyous, are extraordinary places that deserve complete protection. As an avid hiker and one who studies the workings of ecosystems, I have come to learn both the biological and aesthetic importance of these places. To sacrifice our few remaining National Forest roadless areas for limited financial gain is a loss that can never be restored. I strongly urge the Bush administration to act for the long term and preserve these areas for future generations and the health of the entire world. (Individual, Portland, OR - #A3679.10110)

The roadless rule while being an irritation to some, that has brought lawsuits and criticism is one of the best things to occur in most of our lifetimes in regard to public land. With the rule we can proudly speak of preservation for future generations to come, something often spoken, then thrown by the wayside. A roadless rule is not a bad thing. Where enforcement of vehicle bans have taken place, the hunting community for example, complained about it. Later they found that the hunting experience was enhanced by it. I believe the roadless rule will be appreciated by many over time. Even many who don't see it that way now. (Individual, Coulterville, IL - #A114.10111)

BECAUSE OF THE INTRINSIC VALUE OF FORESTS

The most important value of a forest, the one that should be protected above all else, is its value as the living embodiment of millions of years of evolutionary development which has resulted in a healthy, functional community of plants, animals, predators, and prey which is sustained by its efficient, and often beautiful, use of the energy it receives from the sun. The profusion of plants, funguses, insects, and higher animals have all found a place in this community where they can be nourished by the flow of energy from plant to grazer to carnivore, and by so doing, thrive and perpetuate their kind. That it all works out, and works out in such varied and fascinating abundance is miraculous. If we, as a people, cannot honor and protect a portion of something as wondrous as a forest, with all its teeming life, if we can value it only for the monetary gain to be obtained from removing some of its parts, then we, as a people, have failed to mature beyond the frontier mentality of heedless exploitation, and have failed to become responsible caretakers of a precious gift which we do not yet even fully understand. There is much yet to be learned from forests, and it would be a tragedy if they were all converted to sterile tree farms as has been done on industry owned lands.

This should not be construed as advocating that **all** national forest land should be set aside. What it does advocate is that some part of every forest type should **not** be exploited, and that the inventoried roadless areas should be included in that part. (Individual, Dallas, OR - #A3697.10110)

BY ADDING A SUPPLEMENTAL PROHIBITION TO THE EXISTING ROADLESS AREA CONSERVATION RULE

Mining, grazing, logging and all on-road and off-road vehicle use should be prohibited in these areas. As previously stated, it would be neater to prohibit this by adding the supplemental prohibition to the existing rule, rather than wait for plan revisions across the country. (The Chattahoochee has been working on its revision for better than six years now, and appears to need another two years before completion.) As exists today, traditional access to roadless areas by hunters, hikers, fishermen should continue to be expressly allowed. (Individual, Atlanta, GA - #A26430.90000)

1022. Public Concern: The Forest Service should not use maintenance of private property access as an excuse to allow resource removal.

Limited access to property by those who own property in roadless areas is not the problem!! This is a subterfuge for allowing access to any and all that wish to exploit the area. (Individual, No Address - #A1728.40000)

1023. Public Concern: The Forest Service should recognize that commodity production is not the best use of public lands.

Production of forest commodities is no longer the highest and best use of our public lands. We have collectively decided as a society that we wish to preserve wildlife habitat and dispersed recreational opportunities. This is best done by leaving all the remaining roadless areas roadless, and by restoring other public lands with significant habitat potential to the best condition possible. (Individual, Williams, OR - #A1911.65230)

DUE TO THE HARSH CONDITIONS IN MANY ROADLESS AREAS

One point that must be addressed is that roadless areas cannot be viewed as the only areas that have resources. Yet, the questions about roadless areas you have asked us to answer lead one to infer that only in roadless areas do we find any resources.

Such a view is ludicrous and, in fact, the opposite of the truth. Less than 10% of the lower 48 states is anything resembling a wild or unroaded condition. National Forest roadless areas comprise an even smaller percentage. These areas are the least desirable from the standpoint of commodity production because of their lack of commodity resources, their remoteness, harsh environments and other factors.

To suggest that local economies or the nation need to extract commodities from these areas is ridiculous. Even if these areas held important commodities, the mere fact that these areas comprise a small percentage of the land base indicates that those commodities would be gone in a flash. Any economy dependent on commodity extraction from roadless areas is doomed to failure. (Organization, Moscow, ID - #A22654.65000)

1024. Public Concern: The Forest Service should prohibit the removal of forest products.

NATURAL MATERIALS

Those activities that inherently damage the natural environment of a roadless area should be prohibited in roadless areas. These include the use of motorized equipment and vehicles and the gathering or removal of naturally occurring materials. (Individual, Denver, CO - #A17164.90110)

SECONDARY FOREST PRODUCTS

Activities that should be expressly prohibited are the use of off-road vehicles in roadless areas, the harvesting of secondary forest products including but not limited to mushrooms and mining of any sort. (Individual, Salem, OR - #A13948.91221)

1025. Public Concern: The Forest Service should replace logging and mining with environmentally sound alternatives.

The Initiative is badly flawed in that there is no provision to replace the demand for these activities with acceptable alternatives. Logging and mining cannot simply be prohibited unless the demand is reduced or replaced with an (hopefully environmentally friendly) alternative. Otherwise, logging and mining will go off-shore to countries with lower environmental standards than ours. The Earth will suffer even greater loss, in the long run. (Individual, Sumter, SC - #A6210.50400)

1026. Public Concern: The Forest Service should close land previously opened to commercial interests.

BECAUSE IT IS TIME TO STOP DESTROYING OUR NATURAL RESOURCES

In addition, I feel that land that has already been opened to business interests be closed to them. We have consistently been destroying our natural resources in all areas and it is time that it is stopped. The waste in this country is shameful and a whole different attitude toward our environment and resources needs to be fostered. (Individual, Chicago, IL - #A4063.90110)

1027. Public Concern: The Forest Service should prohibit gardening of vegetation for commercial purposes.

The following activities should be completely prohibited in roadless areas: . . . gardening of vegetation for commercial purposes . . . . (Individual, Port Angeles, WA - #A6179.90110)

Timber Removal

Summary

General Comments – A number of respondents assert that there is no justification for removing timber in roadless areas. Some state that timber companies already have an adequate timber supply, while others maintain that the Roadless Area Conservation Rule would decrease timber removal on federal lands by only two percent. The reason the Rule would have so little effect on overall timber production, people assert, is that most roadless areas are unsuitable for timber production—they are steep, remote, and the trees have little commercial value.

Some respondents also question the Forest Service's management of timber. One Organization urges the Agency to recognize the conflict of interest in its management of timber whereby, this organization asserts, Forest Service employees are encouraged to approve timber sales whether they are in the best interests of the public or the environment or not. Another individual suggests that because roadless areas are difficult to access and expensive to harvest, the reason the government probably wants to keep these lands in the timber base is that growth on these lands offsets harvesting on other land. By keeping these lands in production, it allows the over cutting of suitable timber base lands. Further, some ask the Forest Service to explain why it is preparing and implementing timber removal projects in roadless areas given its expressed commitment to conserving wild forests.

Additionally, people suggest the Forest Service monitor timber removal, replant even-age management areas in order to avoid harvesting other areas, and encourage the development of alternatives to wood.

Other respondents do not question the justifiability of removing timber. They suggest that the Forest Service should collaborate with timber companies in the use of sustainable timber practices, and should consider public comment prior to timber sales. According to one individual, timber sales should be announced far enough in advance to allow for early public input, and then find a way not to have the sales held up by public outcry and lawsuits at the last minute.

Adequacy of Analysis – Respondents representing various interests suggest that further analysis is needed related to timber removal. One organization suggests the Forest Service analyze the impacts of removing land from sustained yield management. This respondent remarks, "We want to know the volume of timber that will be removed from sustained yield management, its market

value, the allowable sale quantity, and the potential jobs and income that might have been created if the lands had been managed under the sustained yield, multiple use mandate." Another group suggests that "inasmuch as some options have been precluded by the roadless rule, during the evaluation of roadless areas it is no longer relevant to look at timber harvest potential during roadless evaluation." According to one business, the Agency should analyze the impact of timber sales on lands adjacent to roadless areas, "as these sales have increased fire risk, resource damage and changed wildlife patterns on roaded and unroaded National Forest lands." Finally, one individual asserts that the Agency should require logging companies to perform environmental impact studies in order to prevent environmental damage.

Funding – A few individuals comment that the Forest Service should not charge a fee for dead timber gathering permits and should not sell fiber.

Timber Removal – A number of respondents believe that the Forest Service should permit timber removal in roadless areas—because it would require more acres elsewhere to replace the potential timber volume in these areas; because of the centrality of wood products to our culture; and to sustain turkey farms. Others suggest that timber harvest only be allowed as part of ecological restoration efforts; as long as the Forest Service replaces each harvested tree with five planted trees; or as long as it is not commercialized.

People also suggest various methods by which timber removal ought to be accomplished. Suggestions include harvesting along roads, with temporary logging railroads, by helicopter, by horse, and by elephant. Some suggest the Forest Service focus on harvesting saw logs and small trees, harvesting small diameter timber from roaded areas, selective timber removal, or salvage timber sales. Several respondents suggest a number of specific areas where they say timber removal ought to be allowed, including specific states, counties, and forests, as well as private lands and areas that are already accessible by existing roads.

Some suggest the Forest Service consider a categorical exclusion for some routine activities, such as timber removal. One respondent urges the Agency to implement existing forest plans in order to meet harvest levels adopted during the forest planning process. Others remark that, in general, the Agency should support a sustainable timber industry—by supporting sustainable timber removal practices; by managing second growth in the Tongass National Forest; and by removing restrictions and limitations lobbied by special interests. Some suggest the Agency should allow timber removal on other forest lands to replace lost timber volumes due to roadless designations. Finally, a few individuals recommend that the Forest Service should not place restrictions on timber removal on privately owned forest lands adjacent to state and national forests—inasmuch as, one person argues, the Agency's refusal to thin National Forest System lands will result in more wildfires—and should enlist the public to help clear and thin the forests in order to promote community and cultural involvement.

Other respondents urge the Forest Service to prohibit timber removal in roadless areas. Some mention particular methods of harvesting they say should not be allowed, such as helicopter logging, salvage logging, and even-age management. Others suggest specific places where they say it should be prohibited, including areas containing less than 50 percent suitable timber base. Another individual suggests that the Forest Service should prohibit timber companies from harvesting virgin timber on National Forest System lands. Finally, some assert that the Agency should stop preparing timber sales in the Tongass National Forest which are in violation of the Rule, and should adjust the annual sale quantity downward for national forests in general—to

prevent further biological and recreational problems in roaded areas, and to reflect the interests of special interests and small scale gatherers. (See also Chapter 6: Protecting Forests (Question 3): Timber Harvest.)

Timber Removal General

1028. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule.

TO PROVIDE FORESTRY PROFESSIONALS WITH ADEQUATE TIMBER REMOVAL OPTIONS

By maintaining the roadless plan as we currently see it, you give forestry professionals across the nation a little working room. As you know, we forestry professionals exist in front of society's critical eye, which in turn makes professional public forest management very challenging. The roadless plan removes the "old growth debate" form its primacy, allowing us, the public foresters, the time and energy to develop management schemes for public natural resources that sustains them and sustains humanity.

Our job is only getting more difficult as the US population increases and per capita consumption does as well. Creative forestry is the only way to keep forests managed by professional foresters, and the roadless plan fits the bill. It is creative enough to have substantial public support from across the spectrum. (Individual, Corvallis, OR - #A27066.65230)

1029. Public Concern: The Forest Service should consider that keeping roadless areas in the timberland base allows the over-cutting of more productive land.

For growing timber, Forest Service lands are generally less productive than private land and roadless areas are the least productive of the FS land. Generally roadless lands are very difficult to access and road building would be very expensive. The big reason the government wants to keep these lands in the timberland base is that growth on these lands offsets harvesting on other land. By keeping these lands in the formula for determining how much wood can be cut, it allows the over cutting of better land. (Individual, Merion Station, PA - #A17478.65260)

1030. Public Concern: The Forest Service should consider that timber companies have an adequate timber supply.

THEIR LARGEST CONCERNS ARE FOREIGN COMPETITION AND A GLUTTED MARKET

I have worked for Pyramid Mountain Lumber in Seeley Lake, MT for 21 years. In that time I have heard endless complaints about how lack of available timber would cause the mill to close. The fact is however, that we have always been able to adequately source our mill and we continue to do so. The biggest enemy of the timber industry is foreign competition and a glutted market. (Individual, Condon, MT - #A22480.65210)

1031. Public Concern: The Forest Service should collaborate with timber companies.

IN THE USE OF SUSTAINABLE TIMBER PRACTICES

Locally, Hayward Lumber Company is providing leadership in the use of certified "green wood" and sustainable timber practices. I encourage you to contact Steve Brauneis with Hayward's Strategic Environmental Planning Division to learn more about their ideas and practices. (Business, Monterey, CA - #A7031.15152)

1032. Public Concern: The Forest Service should consider that if it allows timber removal in roadless areas only by skid roads, it will not allow timber removal for long.

DUE TO THE ENVIRONMENTAL DAMAGE CAUSED BY SKID ROADS

The only other way to log in roadless areas would be to use long skid roads ("non-road roads" according to the DEIS). Skid roads usually cause much more environmental damage than do properly constructed roads, so skid roads will likely cause more damage than road building. Due to that increased damage from skid roads, it is unlikely that the Forest Service would allow that for very long. Thus the Forest Service is being disingenuous by saying that logging will continue to the extent indicated in the IRAs. (Union, No Address - #A28881.65220)

1033. Public Concern: The Forest Service should consider public comment prior to timber sales.

Timber sale planning should be announced far enough in advance to allow for early comment, and not have the sales held up by public outcry and lawsuits at the last minute. (Individual, Payette, ID - #A1049.90512)

1034. Public Concern: The Forest Service should consider that most roadless areas are unsuitable for timber removal.

BECAUSE THEY ARE STEEP, REMOTE, AND THE TREES HAVE LITTLE COMMERCIAL VALUE

All lands suitable for logging are already roaded. Presently unroaded lands are the marginal areas without suitable trees for logging and/or lands unsuitable for logging due to terrain, and susceptibility to erosion. (Individual, Bozeman, MT - #A961.65261)

The BOTTOMLINE is that the roadless areas are not good timberlands or, at least, it is NOT COST-EFFECTIVE to timber them. They are either too steep or too remote, or both. If that were not so, they obviously would already have been timbered. Thus, timbering them now would not be in the best interests of the taxpayers. (Individual, Birmingham, AL - #A4991.65262)

I feel that the areas that are still roadless today are roadless for a reason. They are either too remote or too steep or have climatic/elevation features resulting in forests that are too slow growing to produce valuable timber. For the most part, the timber in these remaining roadless areas has too little commercial value to make it worth the costs associated with logging it, particularly the cost of building roads to reach the timber. These areas should be left alone for the wildlife that depends on these ecosystems. If thinning or insect/fire salvage is considered necessary, it should be done by helicopter only. (Individual, Missoula, MT - #A1695.65280)

Montana Logging Association representative Patrick Heffernan admitted that inventoried roadless areas were not the issue for their members. Forest Planners on the Flathead National Forest told me that they would not turn to the roadless areas for timber harvest for another 20-30 years in any event. What is the rush? What is the real issue here? It is not local input. The inventoried roadless areas in Montana are quite often mostly unsuitable for timber harvest by the agencies' own analysis during the Reagan years. You may have made some of those determinations yourself on forests in our region. There has been plenty of input. Lets settle on the national rule published on 1/12/2001. (Organization, Missoula, MT - #A26424.10150)

1035. Public Concern: The Forest Service should acknowledge that the Roadless Area Conservation Rule would decrease timber removal on federal lands by only two percent.

This rule affects 58.5 mullion acres of federal forestlands, which amount to 2% of the US land base and 31% of the Forest Service land base. Implementation of the Roadless Rule would decrease the timber harvest on federal lands by only 2%. (Elected Official, Nevada City, CA - #A12058.65200)

1036. Public Concern: The Forest Service should replant clear-cut areas.

TO AVOID HARVESTING OTHER AREAS

Yes, timber sales do support our library here in Jefferson County, WA. But we do not need to invade the remains of the Okanagon National Forest to pay for libraries. Why not replant the clearcuts? Then the lumber companies can restabilize and reuse those old roads. (Individual, Port Townsend, WA - #A4965.10111)

1037. Public Concern: The Forest Service should monitor timber removal.

Use GPS and frequent audits to enforce any timber sales to eliminate over-cutting.

Post cameras at access points to photograph vehicles entering and leaving to discourage timber theft as well as illegal use of our forests. (Individual, Olympia, WA - #A441.65200)

1038. Public Concern: The Forest Service should encourage the development of alternatives to wood.

We must research and develop other sources of building materials. (Individual, Oakland, CA - #A3602.65290)

Why this country does not take advantage of industrial hemp is a mystery. We could save so many forests by using industrial hemp for our paper products only. Let the paper mills retool and use hemp. It grows quickly and cheaply. If hemp were used for just our newspapers and toilet paper alone many trees could be saved. Please take the use of industrial hemp under serious consideration. Nobody gets “high” on this. (Individual, North Hampton, MA - #A4309.65290)

There are alternatives to logging, both for forests and for loggers. In terms of wood products there are renewable pulp sources that will not affect the old growth and substantial returning growth already present in our forests; there are building materials that are more durable and more energy efficient than wood—let us make use of them. The logging industry has a right to its incomes, but when an industry becomes unviable, say as coal mining and its dependent steel production did in the eastern U.S. at mid-century, it’s time to move on. (Individual, South Lake Tahoe, CA - #A5107.65290)

Instead of logging, why not investigate an alternative for wood, perhaps bamboo? Or a composite so wood waste can be utilized? How about retro planning already planned developments so that more people can live in areas that have already been established? Invest that money to make them attractive. I am mortified that anyone can determine the last vestiges of pristine wilderness are not valuable enough to preserve. This in itself is a sign that my tax dollars are not going towards education. Please do the right thing and preserve the Forest Service’s Roadless Area Conservation Rule as it stands now. (Individual, Kenmore, WA - #A4061.65290)

There is a growing market for the use of building products and “lumber” made from recycled plastic containers, such as 2-liter soda bottles and milk bottles. Please consider that we must save what little is left, and make re-use of what we already used. (Individual, San Diego, CA - #A85.50000)

1039. Public Concern: The Forest Service should recognize the conflict of interest involved in its management of timber.

"The appropriate role of local forest planning" is to recognize that there is an overwhelming conflict of economic interest—where forest service employees are mandated to "get out the cut" to maintain their jobs—even though most timber sales are not in the public interest, are below-cost timber sales, and do damage to important wildlife habitat and fisheries. (Organization, Sheridan, WY - #A17593.12200)

1040. Public Concern: The Forest Service should explain why it is preparing and implementing timber removal projects in roadless areas.

GIVEN ITS EXPRESSED COMMITMENT TO CONSERVING WILD FORESTS

Logging projects on roadless areas in the Sierra Nevada threaten botanically significant areas, imperiled fish and wildlife, and scenic and recreation values. It is fair to ask then, why—as the Service expresses [its] commitment to conserving wild forests the agency is preparing and implementing logging projects in roadless areas? (Individual, Mountain View, CA - #A13532.50000)

Adequacy of Analysis

1041. Public Concern: The Forest Service should analyze the impacts of removing land from sustained yield management.

We want to know the volume of timber that will be removed from sustained yield management, its market value, the allowable sale quantity, and the potential jobs and income that might have been created if the lands had been managed under the sustained yield, multiple use mandate. (Organization, Missoula, MT - #A28141.65200)

1042. Public Concern: The Forest Service should not evaluate timber removal during roadless evaluation

Inasmuch as some options have been precluded by the roadless rule, during the evaluation of roadless areas it is no longer relevant to look at timber harvest potential during roadless evaluation. (Civic Group, Roanoke, VA - #A1713.45521)

1043. Public Concern: The Forest Service should analyze the impact of timber sales on lands adjacent to roadless areas.

The impacts of the timber sale programs on lands adjacent to roadless areas must be analyzed, as these sales have increased fire risk, resource damage and changed wildlife patterns on roaded and unroaded National Forest lands. (Business, Spokane, WA - #A22047.65200)

1044. Public Concern: The Forest Service should require logging companies to perform environmental impact studies.

TO PREVENT ENVIRONMENTAL DAMAGE

Have logging companies perform environmental impact studies and require interventions like developers have. If they cause run-off make certain they build adequate traps to prevent stream damage. There is a logging company on the west coast, I believe Northern California, that is practicing environmentally sensitive logging. It can be done. (Individual, No Address - #A25892.65280)

Funding

1045. Public Concern: The Forest Service should not charge a fee for dead timber gathering permits.

How about not charging for permits for dead wood gathering? (Individual, No Address - #A5360.30200)

1046. Public Concern: The Forest Service should not sell fiber.

CHIP THE BRUSH AND LEAVE IT ON THE FOREST

Chip the brush and leave it there. No selling of fiber. (Individual, Redway, CA - #A7008.30540)

Allow Timber Removal

1047. Public Concern: The Forest Service should permit timber removal in roadless areas.

BECAUSE IT WOULD REQUIRE MORE ACRES ELSEWHERE TO REPLACE THE TIMBER VOLUME

In his 13 October 1999 announcement of this initiative, President Clinton noted, "Only five percent of our country's timber comes from the national forests. Less than five percent of the national forests' timber is now being cut in roadless areas. We can easily adjust our federal timber program to replace five percent of five percent, but we can never replace what we might destroy if we don't protect these 40 million acres."

There are at least three problems with this statement. First, timber production on 40 million acres of land that has been tied up in a litigation and studies for several decades, where, in fact, timber production has largely been prohibited pending decisions on the future of those lands, is simply not relevant to this debate. What is relevant is not that "five percent of five percent" of the Nation's timber supply has somehow managed to trickle off those lands but, rather, the fact (according to Forest Service data) that forty-six percent of the entire softwood growing stock timber inventory of the United States is on National Forest lands. It is also relevant that many acres of those lands are among the most productive timberlands on earth and it would require many more acres elsewhere to replace the timber that might have been harvested from them. *Even more important is that this replacement would have to be not only for the timber standing on those lands today, but also for all of the timber that might grow there in the future.* (Organization, Orono, ME - #A17644.65210)

BECAUSE OF THE CENTRALITY OF WOOD PRODUCTS TO OUR CULTURE

What about trees and wood? Wood products are something that are used in everyone's life, every day—the house you live in, paper, telephone poles, power poles, bridges, etc. The government couldn't operate without paper, nor could the banks or schools. If it hadn't been for wood to build the ships used to discover America, we probably wouldn't be here today. The wagon they used to pioneer the great country and the railroads that take the trains from coast to coast used wood. As you drive down the highway, look at the guardrails that keep you from plunging over a cliff or into a river and the fences that keep the livestock off the roads. I think that everyone just takes all these things for granted and doesn't realize how important wood is to everyone. How about all the jobs that the wood products industry create? For example, the child that starts school uses wooden pencils and paper they draw on. There are thousands of uses of wood if you open your eyes and look around. (Individual, Bonner, MT - #A958.65240)

TO SUSTAIN TURKEY FARMS

This also gives the turkey farmers a problem because the loggers will not be able to chop down wood or even get the dead and dried-out wood from the trees on the mountain to make the sawdust for the turkey farmers, and sawdust also makes nutri-mulch, one of the best fertilizers. (Individual, Chester, UT - #A22041.90510)

This issue also affects turkey farmers. Sanpete County is a county of turkey farming. All of the turkey farmers depend on the logging of our dead trees on our mountains for sawdust. (Individual, Moroni, UT - #A22043.90510)

AS PART OF ECOLOGICAL RESTORATION EFFORTS

If merchantable timber can be extracted as part of ecological restoration efforts, this should be allowed, but determination of what constitutes "ecological restoration" should not be at the discretion of USFS

silviculturists. It should be decided by ecologists from outside the agency. (Individual, Corvallis, OR - #A650.65220)

There are a few instances where chain saws might legitimately be used to move the vegetation towards ecological sustainability. When the USFS recognizes this situation, say so. A chainsaw is not needed on every acre. Nature seems to be doing pretty well . . . without our "help." (Individual, Grangeville, ID - #A830.65260)

AS LONG AS THE FOREST SERVICE REPLACES EACH HARVESTED TREE WITH FIVE PLANTED TREES

I really do not have a problem with logging if the government replaces each tree with five more. If they do not wish to do this, then tough. (Individual, No Address - #A10440.90520)

AS LONG AS IT IS NOT COMMERCIALIZED

We must not allow timber harvesters to become commercialized—small loggers in Vermont are able to support their families without intruding into the Green Mt. National Forests. (Individual, Shelburne, VT - #A8102.90520)

1048. Public Concern: The Forest Service should permit timber removal by various methods.

Please consider my viewpoints on the roadless issue to be against closing any more Forest Service roads. I also do not believe that logging is that detrimental to the forest if done properly and managed well. (Individual, No Address - #A724.90510)

Forests are a resource that should be utilized. It makes little sense to me to leave past areas off limits to efficient logging opportunists. (Individual, Phillips, WI - #A801.90510)

WITH ROADS

Timber in national forests should be recognized and treated as an important national asset. The Forest Service should return to a program of sustainable harvesting for the benefit of the whole (lumber-using) country and as one way to reduce wildfire hazards. Harvesting timber without building roads would be much more expensive and would reduce the ability to clear brush and slash as an economical part of harvesting contracts. (Individual, Twain Harte, CA - #A1043.90510)

THROUGH A HARVESTING SYSTEM THAT DOES NOT REQUIRE ADDITIONAL ROADS

Something that is desperately needed is a long reaching (miles) and economically feasible logging system that will permit removal of timber without additional roads. (Individual, Ellensburg, WA - #A17772.65220)

THROUGH THE CONSTRUCTION OF TEMPORARY LOGGING RAILROADS

All of the arguments regarding logging roads only list two alternatives—roads for trucks or not logging. There is a third way, used for many years by loggers but now mostly ignored: temporary logging RAILROADS!

For over a hundred years loggers in all parts of the U.S. and Canada used these, and a few even survive. In the steam era they even gave rise to a number of unique locomotive types, including three types of geared steam. Diesel locomotives were also found suitable.

Advantages of logging railroads:

1 Narrower right-of-way: 1 track vs. 2 lanes plus, pull offs.

2 Reduced grades: this requirement of steel wheels on steel rail often will require trestles yet these are easily constructed of material at hand—logs—and as they only need carry a single track they can be far cheaper then an equivalent truck trestle. This need for trestles often means point-to-point distances are greatly reduced from that needed for roads as track jumps across narrow valleys rather than winding down one side and up the other

3. Reduced dust clouds and erosion: both unavoidable where heavy trucks constantly tear up dirt roads.

4. Greatly reduced air pollution form hydrocarbons, meaning diesel exhaust. A single 1500 HP locomotive diesel easily does the work of 50 trucks of then times the horsepower and putting out 100 times as much exhaust. Also, the reduced grades of a railroad means power needs to move a given load are less, and locos do not have to pour out huge carbonous clouds as they claw up grades as trucks do as they climb out of valleys [that] railroads jump across.

5. Limited access: only rail equipment can use a railroad while any car, truck, bus, motorcycle, etc. can use a road.

6. Recoverable assets and reclamation: when a logging railroad is no longer needed, the rails and ties are picked up and reused. Little damage has been done to the land and vegetation quickly recovers.

7. Safety: a couple of radio-dispatched trains are far less likely to have accidents compared to dozens of trucks challenging each other at blind curves, narrow no-passing areas, etc. Also, [there is] far less danger of fire from a handful of diesel locomotives on a dedicated track to dozens of tracks which often run through dry brush, etc.

8. Tax saving: logging companies have always built their own railroads—no reason for taxpayers to foot the bill as they do for roads (see 5 above).

Conclusion: logging railroads are a sound compromise in that they allow logging yet with little of the damage and taxpayer cost of logging roads. Both sides will strongly oppose this idea, which means it is a good compromise, (if you cannot get both sides to agree to a compromise, find one both hate—just never favor one side over other—the first rule of an arbitration). (Individual, Burkeville, VA - #A23064.90412)

BY HELICOPTER

If economical, some limited helicopter logging could be done. (Individual, Missoula, MT - #A113.90516)

If and when necessary, non-clear-cut logging could be allowed using horse or helicopter. (Individual, Bozeman, MT - #A285.90523)

BY HORSE

You could consider logging if they wanted to bring it out by horse. (Individual, No Address - #A781.90520)

BY ELEPHANT

I favor new technologies or old technologies that work. In Indonesia they use elephants because they're easy on the fragile soil and because they can selectively cut trees and easily get them out of the cut area—that's the kind of logging I agree with. (Individual, Palmer Lake, CO - #A23361.90510)

HARVEST SAW LOGS AND SMALL TREES

The USFS should focus on caring for the Roaded areas - harvesting some saw logs and many more small trees. That is what we do on the 2,800 Double Arrow Ranch with 370 homes. (Individual, Seeley Lake, MT - #A5799.30100)

HARVEST SMALL-DIAMETER TIMBER FROM ROADED AREAS

The Forest Service must advance small diameter timber utilization from roaded areas. (Individual, Cleveland, OH - #A26411.65220)

SELECTIVE TIMBER REMOVAL

Woodlots/woodlands have to be managed: Good management practices require that you have roads into the woodlands. For example in our part of the country (NH) hemlock trees often develop rotten heartwood when they get up to 15+ inches in diameter. It's foolish to just let them stand there and rot till they fall. There are many trees that just need to be harvested and thinned out so that better quality timber can grow. Access needs to be available so that collections of underbrush and downed limbs etc. can be chipped or removed for fire protection. You need roads for these chores. (Individual, Keene, NH - #A3648.65200)

Keeping in mind that during the 1940s, the private timber companies opposed the cutting of timber on public lands, I think that these policies should be revived.

Timber cutting should be done only for the following:

a) To thin trees to reduce wild fire danger

b) Christmas trees

c) Firewood for public use.

d) When trees are so old that they are about to die, then it's OK to cut some of them that are deemed surplus for wildlife use (e.g. termites/birds, etc). (Individual, Olympia, WA - #A441.65200)

SALVAGE TIMBER REMOVAL

I support a policy that allows those same emergency fire roads to be used for a limited time only (perhaps a limit of two years past the fire season) as avenues for salvage logging. There's no point in wasting timber that has already burnt. As the situation in Yellowstone today shows, burnt trees that have dried and toppled only turn to matchsticks, increasing fire danger with no significant improvement to forest health in a dry climate (no humus formed for hundreds of years!). I support limited and selective logging of burned areas - no clear cutting, always using best practices, and all other current regulations should be followed without exception. (Individual, West Yellowstone, MT - #A1045.31120)

In those cases where such devastation does occur, consideration should be given to the appropriate recovery of damaged timber resources for both the utilization of such timber for the building needs of our nation and to prevent the spread of disease and destruction of healthy stands of timber. (Organization, Washington, DC - #A5069.31120)

1049. Public Concern: The Forest Service should permit timber removal in certain areas.

IN WISCONSIN

I am opposed to any policy that would restrict the construction of roads and the use of motorized vehicles in National Forest land, thereby ending timber production on these lands. Any such policy would have a negative effect on our economy and residents of Wisconsin who we represent. (Elected Official, State of Wisconsin - #A30167.90100)

IN SIERRA COUNTY

Timber harvests (fuel wood gathering and timber operations) have been a vital part of Sierra County's customs and cultures and economy. The impact of the Roadless Area Initiative has yet to be determined, but its impact on future fuel wood gathering and any timber production could be significant. This is because it could lock up almost all of the forests, resulting in less than 20% left for multiple use and future timber production in Sierra County. (Manager, Sierra County, NM - #A22059.65230)

IN ROADED AREAS OF THE TONGASS NATIONAL FOREST

Another major issue examined during the TLMP revision process was the issue of falldown, or the failure of remotely sensed data to adequately portray timber and landscape condition. The reality is that the Tongass does not have the extensive timber resources it was once thought to have. The forest wide average timber per acre is not 25 mbf/acre. Harvest between 1955 and 1990 averaged about 41 mbf/acre (USDA Forest Service, 1991). This high-grading makes it very difficult now to plan large timber sales that are economical. Removal of remaining old growth stands has serious implications for species viability. The Forest Service should now turn its attention to sustainable harvesting from roaded areas for locally owned small operators (Individual, Sitka, AK - #A15506.45623)

The logging industry was not kind to its workers or the environment. It saddens and frustrates me that our congressmen continue to scream loudly for jobs in the timber industry when the industry left its employees high and dry before the 50-year contracts ever ended. The two mills' bad treatment of their

workers is well documented. The industry couldn't compete with lower priced Canadian wood for pulp but the misinformation about why the mills were going down the tubes continues to abound.

It also seems that people have forgotten that Alaska Pulp and Ketchikan Pulp Co. had illegally divided up the forest between themselves, violated antitrust laws, forced small companies out of business, and perpetrated some of the worst logging practices in the history of logging. However, if the industry wants to continue to pursue clear-cut logging in the Tongass forest it still can. The Forest Service needs to hold the industry to logging in the areas where roads already exist and not allow them into pristine wilderness where the recreation, fish, and wildlife values are so important. (Individual, Juneau, AK - #A10588.45623)

I am particularly concerned that the Tongass roadless area receive full protection for their identified roadless areas.

I have lived in the Tongass for three decades and value the wildlands, wilderness, and the natural living resources of the area. I include old growth and uneven-aged forests among the living resources as well as the wildlife, fish, and understory plants. Chief Bosworth, if you lived here or visited our wild areas, you would recognize that the ecosystem is still intact, thanks to the cessation of industrial-scale logging when the two pulp mills closed.

The greatest good in the long-range scheme of life is to leave this magnificent forest. We can not improve upon it by building roads and cutting trees. There is ample inventory of timber adjacent to the existing roads to support reasonable harvesting far into the future, without entering the unroaded areas.

My family and I use the Tongass for subsistence activities, recreation and rejuvenation. We use a boat or kayaks to reach many places within the Sitka area. We share the areas with friends and visitors; none of them say they think the forest should be clearcut to satisfy a political agenda. (Individual, Sitka, AK - #A17360.45623)

IN THE ROGUE RIVER/SISKIYOU NATIONAL FOREST

The Rogue River/Siskiyou National Forest covers some 1.750 million acres. For comparison, the State of Oregon manages some 18,073 acres in southwest Oregon. In 1999, the state sold 6.1 mmbf under sustainable forestry practices. The 466 employees of the Rogue River/Siskiyou National Forest, with an annual payroll of approximately $38.45 million, are either incompetent or the NWFP is broken! The Clinton Administration Northwest Forest Plan (NWFP) **promised** an annual allowable harvest on the Rogue River/Siskiyou National Forest of 50 million board feet (mmbf). In Fiscal Year (FY) 2000, the total harvest on the Rogue River/Siskiyou National Forest was **less than one 1 million board feet.** (Association, Medford, OR - #A17183.65263)

ON PRIVATE LANDS

Out west I have seen huge areas of clear cut. The "seed trees" left on a national forest in which I camped in S. Wyoming were sitting there useless. No seedlings in sight and the cut over was old.

Silviculture can and should be done by private property owners. Our national forests and BLM lands need to be preserved and restored for native habitat and clean water. (Individual, Bradenton, FL - #A12811.30700)

We have millions of acres of forests in this country, and the only significant resources that can be extracted from them are wood and wood pulp. These materials can be produced at very competitive cost from private forests where the trees are replanted, in other words, sustainably. (Individual, Northridge, CA - #A12738.65240)

ONLY IN AREAS THAT ARE ALREADY ACCESSIBLE BY EXISTING ROADS

I understand this is a tough decision for the FS to make since the mandate of the FS is to manage its lands for many uses including timber harvest. However, I believe the FS should focus on managing timber stands for harvest only on NF lands that are already accessible by existing roads. Why destroy a pristine ecosystem for timber that will only build a handful of houses and take a century to recover? (Individual, Washington, DC - #A5223.75510)

We need to continue logging, but I encourage you to support further logging and road building in areas already "defiled." (Individual, Salem, OR - #A452.65200)

1050. Public Concern: The Forest Service should consider a categorical exclusion for some routine activities.

SUCH AS TIMBER REMOVAL

I think the Forest Service is spending too much of it's limited manpower and budget on what I consider frivolous appeals and lawsuits that really have very little merit. For example, almost all of the eastern United States has been clear-cut or high-graded numerous times with no permanent damage as can be seen by the fact that we now have numerous wilderness areas in these same cutover areas. Why doesn't the Forest Service use that fact alone as basis for proposing that more routine activities that have been occurring for years be categorically excluded from a NEPA decision? (Individual, Russellville, AR - #A3484.45500)

1051. Public Concern: The Forest Service should implement existing forest plans.

TO MEET HARVEST LEVELS ADOPTED DURING THE FOREST PLANNING PROCESS

Notwithstanding the current programmed sale levels are significantly lower than the harvest levels adopted during the LRMP process, the Forest Service is not able to meet these lowered programmed sale levels even with increased funding and staffing. It is our position that the public would be better served and the Forest Service's time and money better spent if it shifted its attention to implementing the existing forest plans and removing the institutional impediments that preclude effective implementation. (Elected Official, Roseburg, OR - #A11811.65263)

1052. Public Concern: The Forest Service should support a sustainable timber industry.

BY SUPPORTING SUSTAINABLE TIMBER REMOVAL PRACTICES

If the industry learned to operate by cutting less than what it grows, cutting lower quality trees leaving established "legacy" trees to continue their population and to support other life dependent upon them, cutting in harvest cycles of several decades taking only 1/3 of the trees of designated allotments, and maintaining trees of all sizes and ages within each allotment, maybe we could see a sustainable timber industry. This industry would not be dependent upon new roads in areas of the forest which are now currently in natural states, but would be able to operate on private land and within existing timber allotments. This practice could also allow a healthy forest to consistently exist within the allotment. As it stands now, when timber interests harvest trees they leave the landscape barren and nearly useless after a few harvests. (Individual, Carbondale, CO - #A17312.65220)

BY MANAGING SECOND GROWTH IN THE TONGASS NATIONAL FOREST

Manage second growth for a sustainable future timber industry: Forest Service timber management efforts should focus on the vast tracts of second growth now available on the Tongass. With 70% of the healthiest old growth stands now harvested, it is time to look at what is happening in those clear cuts. The future of the Tongass timber industry lies in the effective management of second growth stands-NOT in the continued assault on old growth. Pre-commercial and commercial thinning efforts need to be stepped up a hundred-fold in the Tongass. The careful grooming of our second growth will ensure a sustainable timber economy over the long haul. Anything else is short sighted and a recipe for environmental as well as economic disaster for the region. (Individual, Tenakee Springs, AK - #A1758.65280)

BY REMOVING RESTRICTIONS AND LIMITATIONS

It has been harped upon for decades that federal timber sales in Montana are money-losing propositions. This is because of the hoops that companies must jump through to obtain permission for their operations. A federal timber sale could exist alongside a state or private logging operation, with the same quality of

trees, and lose money while the state or private unit would be profitable, all because of excessive restriction and limitations lobbied for by environmentalists. (Individual, East Helena, MT - #A20422.15121)

1053. Public Concern: The Forest Service should allow timber removal on other forest lands to replace lost timber volumes due to roadless designations.

Any roadless review program should examine revising the timber harvest levels to meet the multiple use objectives. With the disparity between growth and harvest, the opportunities to harvest are graphically illustrated in the DEIS (page 3-112) wherein it noted that net annual growth on the NFS in 1997 was 20.5 billion board feet. This growth and yield indicates that there are options to reduce development pressure on the roadless areas by increasing the harvest levels on the remaining lands or to spread the impacts across a large land base. (Elected Official, Roseburg, OR - #A11811.65263)

IN OREGON

The analysis assumes that timber harvest reductions resulting from the prohibition proposed would not be replaced with timber volume from other NFS lands (DEIS 3-11), however since the same attributes and amenities that are allegedly benefited by the proposed action are also found in land management prescriptions already in place on other NFS lands, we recommend reexamining these other land allocations and prescriptions to determine if they can be eliminated or otherwise modified to replace the lost timber volumes. This is particularly relevant on the Oregon forests where the majority of NFS lands are now managed for biodiversity, endangered species, recreation, and other non-timber values. (Elected Official, Roseburg, OR - #A11811.65263)

1054. Public Concern: The Forest Service should not place restrictions on timber removal on privately owned forest lands adjacent to state and national forests.

BECAUSE THE FOREST SERVICE'S REFUSAL TO THIN NATIONAL FOREST SYSTEM LANDS WILL RESULT IN MORE WILDFIRES

Privately owned forestlands adjacent to State and National Forests should not have restrictions that prevent timber harvest. Wildfires will continue to burn the forest as USDA Forest Service refuses to thin National Forest or allow commercial logging and road building in 49.2 million acres of roadless national forest, with limited exceptions for public safety and national security. (Individual, Jefferson, OR - #A775.30700)

1055. Public Concern: The Forest Service should enlist the public to help clear and thin the forests.

AS IT PROMOTES COMMUNITY AND CULTURAL INVOLVEMENT

I believe public participation into helping with the clearing and thinning should be the ultimate tool as it always has been around here. It promotes community and the culture that existed until recently that is strong and involved in the forest as a cultural reality. (Individual, No Address - #A5360.30100)

1056. Public Concern: The Forest Service should allow wood gathering in roadless areas.

Forest gathering is fun. (I have often gone into the forest for wood and collected pinion, gone fishing and had a picnic.) Being in the forest is calming. Gathering is good exercise. Gathering allows you to do something important while you are scouting for the hunt or just visiting. (Individual, No Address - #A5360.65290)

Do Not Allow/Restrict Timber Removal

1057. Public Concern: The Forest Service should prohibit timber removal in roadless areas.

The following activity should be expressly prohibited in the roadless areas: Logging by any means. Mechanical thinning is not to be included in this restriction, but any tree cut must remain on site, soil shall not be compacted by vehicles, and distribution of remaining trees shall follow patterns natural to the area. (Individual, Dallas, OR - #A3697.90100)

DURING THE ANPR COMMENT PERIOD

SWAN opposes the initiation and implementation of logging projects within roadless areas during this time of comment. This is unconscionable. More than a million people commented and raised their collective voice that these areas should be protected. Now, the President has unilaterally changed the policy giving the National Forests to scurry into roadless areas out west during this period of "administrative limbo." While SWAN does not work in Alaska and California, we, as American citizens, are harmed as well. (Organization, Plymouth, MN - #A7116.15112)

1058. Public Concern: The Forest Service should prohibit all timber removal methods.

HELICOPTER LOGGING

The alternative use of helicopters is not that desirable because of the dangers a crash can cause to the forest especially fire. (Individual, No Address - #A31.90526)

Next thing I hear is that some companies plan to bypass the regulations by using helicopters to bring in their equipment and labor force—and to haul their "products" out. What kind of a game is this? (Individual, Monrovia, CA - #A190.90526)

SALVAGE LOGGING

We urge the agency to approve a plan that: Prohibits not just "commercial logging" but also any other removal of living or dead trees from roadless areas. (Organization, Missoula, MT - #A17234.90520)

CLEAR CUTTING

Logging should be limited to traditional non-mechanized clearing and single tree extraction. Clear cutting should be banned throughout the entire national forest system. (Individual, Winchester, VA - #A378.90520)

I support prohibition of large-scale clear-cut logging and large-scale mining. Decisions on small logging and mining operations, as well as off-road vehicle use, should be made on a forest-by-forest basis, after a planning process that involves a nationwide public comment opportunity. (Individual, Sitka, AK - #A698.90520)

Clear cutting takes away the cones/re-growth and causes all kinds of damage that loggers don't pay for or clean up after. (Take a look at clear-cut areas with no re-growth—have loggers take care of the land, as a farmer/rancher takes care of his). (Individual, Bozeman, MT - #A665.90523)

Clear cuts should be ended as a primitive form of management with gross ecosystem impacts. (Individual, Boise, ID - #A64.90523)

1059. Public Concern: The Forest Service should prohibit timber removal in certain areas.

IN WASHINGTON STATE

We live in Washington State, at the foot of Mt. Rainer, on the northwest corner of the National Park. Surrounding the mountain inside of the Park is a VIRGIN, TEMPERATE, INLAND RAINFOREST, with well over 200 inches of annual rainfall. We live on our own privately owned lands in the middle of timber company holdings, just a few miles from the entrance to the park. There are about 50 people that live in our unincorporated area of Fairfax. We see the atrocities that are inflicted on the forests during clear-cutting and spraying of poisons. We are first-hand witnesses to this destruction, because we see it everyday. Our VIRGIN TEMPERATE, INLAND RAINFOREST in the park is being affected by industry logging RIGHT UP TO ITS BORDER in three separate sections on the north side. We barely have one mile of Forest Service lands as a buffer for the park in many places. Clear-cutting was drastically escalated before the Salmon Plan kicked in. They logged all of our seven-mile INLAND, TEMPERATE, RAINFOREST valley in just a few short years. (We have only a few sections that are public-owned 'islands' of land in our valley, and the oldest tree farm is just 28 years old.) This hurt our local loggers, because that much area could have provided work for a decade for just locals, but they called in crews from all around to log faster. They are logging huge areas of 20-30 year-old trees for chip-wood that could be made from many other types of wood. This is ridiculous! They have also built about 2-3 miles of new road on every square mile up here while they could, before the salmon sanctions started. Hundreds of permits went out before the plan kicked in. (Organization, South Prairie, WA - #A28978.65200)

IN AREAS CONTAINING LESS THAN 50 PERCENT SUITABLE TIMBER BASE

No IRA should be allocated to developmental uses if the land has only "poor" timber site or productivity, even if it's currently stocked with mature timber. Only "fair to good" site or productivity should be considered for allocation to developmental uses in an IRA. Timber sites with "poor" productivity will be too costly to manage for timber and the "wildness" tradeoff will be too high.

An IRA should not be considered for development unless it contains at least 50% or more suitable timber land. If it contains less than 50%, it will probably be uneconomical and the "wildness" tradeoff will be too high. An IRA land area should also have at least 50% or higher productive soils to be considered for development. Less than 50% will to too costly to manage for development. (Individual, Libby, MT - #A2301.65260)

IN THE SKYKIOMISH WILD COUNTRY

I would especially oppose any logging in the Skykiomish Wild Country near INDEX. (Individual, Seattle, WA - #A41071.90520)

1060. Public Concern: The Forest Service should prohibit timber companies from harvesting virgin timber on National Forest System lands.

Large timber companies that want big virgin wood should learn to grow it on their own property. (Individual, Amasa, MI - #A793.45626)

1061. Public Concern: The Forest Service should stop preparing timber sales in the Tongass National Forest.

WHICH ARE IN VIOLATION OF THE ROADLESS AREA CONSERVATION RULE

The Roadless Area Conservation Rule should be retained and implemented as is. The Bush administration needs to do all that it can to ensure protection of America's remaining roadless areas. In particular, the Forest Service should stop preparing timber sales in the Tongass National Forest that are in violation of the Roadless Area Conservation Rule. (Individual, Napa, CA - #A1037.10150)

ON PRINCE OF WALES AND GRAVINA ISLANDS

The Forest Service should stop timber sales in the Tongass National Forest that violate the Roadless Area Rule. Some sales proposed for wild places like Prince of Wales Island's last roadless areas, and Gravina Island, should be the first to be called off. (Individual, San Francisco, CA - #A17368.12440)

1062. Public Concern: The Forest Service should adjust the annual sale quantity downward.

TO PREVENT FURTHER BIOLOGICAL AND RECREATIONAL PROBLEMS IN ROADED AREAS

The Forest Service typically employs timber targets for National Forests. As roadless lands in the Forest Service timber base are conserved under a roadless area protection policy, the roadless lands will be removed from the timber base. This will impact the timber sale program of the National Forests.

Siskiyou Project recommends that the annual sale quantity be adjusted to a lower harvest amount. The only other alternative is to shift this timber burden to the roaded portions of the National Forest System. This approach is not sustainable. The roaded portions of our National Forests require restoration and recovery from damaging activities. To expect more harvest from this land based on a "rob Peter to pay Paul" approach that will further compound biological and recreational problems on the roaded parts of the National Forest system. (Organization, Cave Junction, OR - #A17235.65230)

TO REFLECT THE INTERESTS OF SPECIAL INTEREST GROUPS AND SMALL SCALE GATHERERS

The old way did not work, in many ways; the rape and management of the forests has been poor in many ways. First, before and after the turn of the century (late 1800s and early 1900s was a period of wanton rape all over the country). Then there was a period of heavy use, then a period where roadless areas were designated as a reaction to the incredible big scale logging and rape of the forest. Then the miserable policy of the "Smokey the Bear" system devastated the natural ability of the forest to take care of itself. Then the poorly directed environmentalists continue the dysfunction by insisting that we do nothing to the forests. All the while we ignore the culturally and historically valid systems that have validity of carefully tending the forest by using and protecting this treasure. The loggers have some place here and I would rather have the forest logged than burned up. The methods of logging have to be seriously looked at and scaled down to reflect the interest of the enviros and the needs of the smaller scale gatherers. (Individual, No Address - #A5360.30100)

1063. Public Concern: The Forest Service should prohibit wood gathering in roadless areas.

UNLESS THE AREA IS A BUFFER ZONE

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 firewood, with the exemption of those areas considered buffer zones for the protection of human settlements. (Individual, No Address - #A26840.90000)

Mining, Oil, and Gas Development

Summary

General Comments – Most general comments regarding mining, oil, and gas development deal with mining leases and management related to mineral exploration in general. One Organization is concerned mineral rights are not "held hostage" within roadless areas and believes the exception for existing leases in the current Roadless Rule is a fair and reasonable.and goes on to recommend that the Forest Service revise management of mining leases in inventoried roadless areas such as to discourage further mineral exploration. Another suggests the Agency should hold companies responsible for environmental damage.

Others assert that the Forest Service should not implement the Roadless Area Conservation Rule because it will make mineral exploration less feasible because of increased permitting costs and mitigations measures.This respondent goes on to cite numerous legal and statutory references to assert that, in fact, the surface Mining Control and Reclamation Act of 1977 obviates the need to apply the Rule to mining; hence the Forest Service should exclude mining lease renewal and modification from application of the Rule.

One elected official advises the Forest Service to address short-term safety issues regarding mining activities while the Rule is undergoing review. "While the Roadless Area Rule has been enjoined," writes this respondent, "the effects of the roadless boundary are being felt on the daily operations of the mines. For example, two of the mines are now drilling methane ventilation holes from the surface in order to protect worker safety. However, even though they hold existing coal leases, the roadless area issue is slowing down the approval of the drilling program. It is critical that the Forest Service address these short-term safety impacts that can't wait to be resolved until a revision of the Forest Management Plan is completed."

Adequacy of Analysis – A number of respondents offer suggestions regarding the analysis of mining impacts. To begin with, some suggest the Forest Service should analyze oil and gas resource potential in roadless areas, specifically through a public lands inventory of hydrocarbon potential. According to some, the Agency should assess the amount of oil reserves that lie under National Forest System lands, while others say it should assess the percentage of coal that comes from these lands. On a similar note, some recommend the Agency assess the impact of the Roadless Area Conservation Rule on energy potential.

One county commissioner calls on the Forest Service to provide a legal review to determine whether the Rule can prohibit access to mining claims. Others suggest the Agency obtain input from the Bureau of Land Management regarding leasing areas included in the roadless inventory. One association asks the Agency specifically to justify its claim that inventoried roadless areas would be among the last areas entered for exploration and development. They do not believe this is clear in the final rule and distrust the Agency's motives.

Organizations comment in particular about monitoring of mining activities. According to one, the Forest Service should improve post-plan monitoring of oil and gas developments; this should include, this respondent goes on, development of an inventory of resource data. This same organization encourages the Agency to prepare a reasonably foreseeable development scenario for analysis of effects of oil and gas development, one which analyzes the net effect of long-term surface disturbance rather than the number of wells to be drilled.

Mining, Oil, and Gas Development –The most common remark made on this topic is that the Forest Service should ensure access for mining—as required by law (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 by the Forest Service Manual and regulations. Others assert that the Forest Service should specifically allow mineral, oil, and gas exploration and extraction in roadless areas—to help lower the costs of fuel in the United States and to help maintain the supply of hardrock minerals critical for defense technologies. One individual adds, however, that continued exploration and extraction should only be allowed if companies agree to clean up existing super-fund sites. Likewise, some say it should only be allowed by certain methods, such as slant drilling or other techniques which do not disturb the surface, or by manual means.

A number of respondents suggest specific states or areas in which mining exploration and extraction, they say, should be allowed to continue, as well as certain mining operations they say should continue. Additionally, a few respondents ask the Forest Service to clarify that mining leases issued by the Bureau of Land Management will not be affected by the Roadless Area Conservation Rule. Finally, one utility group asks the Forest Service to exempt geothermal leases from the Rule, including new geothermal resource areas identified by the Bureau of Land Management.

Although those who state that mining exploration and extraction should be allowed to continue typically write more detailed responses on behalf of their position, others assert that mineral exploration and extraction should be restricted. In particular, a number of individuals and Organizations state that it should be prohibited altogether in roadless areas. People also identify certain mining methods they say should not be allowed, including acid mine draining, gold mining techniques, and recreational mining. Additionally, respondents identify specific states and areas where they say mineral exploration should be prohibited. One individual asks the Forest Service to revoke inactive mining claims. Finally, although the issue of drilling in the Alaska National Arctic Wildlife Refuge does not arise in the Advance Notice of Proposed Rulemaking, several respondents urge the Forest Service to oppose it.

Mining, Oil, and Gas Development General

1064. Public Concern: The Forest Service should revise management of mining leases in inventoried roadless areas.

As a general matter, roadless areas must not be "held hostage" to mineral rights within their borders. The exception for existing leases in the current Roadless Rule is a fair and reasonable compromise. Further, we recognize certain limitations in addressing private mineral rights on national forests, but recommend that, at a minimum, the following principles be included in the final roadless area policy. First, no new mineral leases should be offered in inventoried roadless areas. Second, existing leases in inventoried roadless areas should be allowed to expire whenever possible. In addition, existing leases within roadless areas should not be subject to communitization agreements unless all leases covered by the agreement are located entirely within the roadless area. Finally, the Forest Service should consider "mineral withdrawals" for roadless areas in special circumstances. Such circumstances might include a perceived threat to a certain roadless area or areas. (Organization, Charlottesville, VA - #A25689.65340)

1065. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.

BECAUSE IT WILL MAKE MINERAL EXPLORATION LESS FEASIBLE

Just as the clear leasing exception of [section] 294.12(b)(7) has been muddied by the FEIS, however, here too in the case of locatable hard rock minerals (such as gold, silver, platinum, and palladium), the access protections for mining claimants are inadequate. Exploration for and development of locatable minerals will still face significant adverse impacts under the *application* of the Roadless Rule due to increases in permitting costs and mitigation measures. In other words, road construction in inventoried roadless areas, even if allowed, will be subjected to more stringent regulatory requirements by the mere fact of location within a roadless conservation area, not withstanding that the areas are open to multiple use, including mineral entry, as specified by Congress. For example, the FEIS explained: For both locatable and leasable minerals, there may also be impacts associated with potential increases in the costs of permitting and environmental mitigation of activities within inventoried roadless areas. This could affect future exploration and development for leasable and locatable minerals. Most proposed activities, particularly if they are proposed within inventoried roadless areas, are already subject to intense scrutiny through preparation of environmental impact statements. However, it is possible that in

some cases, the requirements for environmental analysis may increase, mitigation requirements may increase, and the processing times may increase. Over the long term higher costs and longer processing times might cause some portion of the mineral resources in inventoried roadless areas to become uneconomic. If that occurred, the level of development would be reduced . . . .

FEIS, Vol. 1 at 3-316 - 3-317. See also FEIS, Vol. 1 at 3-321 ("Exploration and development of locatable minerals could be affected if costs are increased because of additional environmental mitigation and/or delays." (discussing social effects of the preferred alternative).

Indeed, all indications point to heightened environmental regulatory standards in roadless areas. Thus, under its "Roads Policy" (published in the Federal Register on the same day as the Roadless Rule), the Forest Service provides that a full-blown environmental impact statement will be required for any road construction or reconstruction in roadless areas.

There is no such *per se* rule in the current system, nor is there a need for one. Such decisions have been made on a case-by-case basis and a less onerous "environmental assessment" is often sufficient.

This is particularly the case with regard to hard rock minerals, because (like the mining of leasable minerals) mining of locatable minerals on National Forest lands is subjected to detailed environmental protection requirements contained in the Forest Service's own regulations at 36 C.F.R> Part 228, Subpart A. These rules contain specific requirements for the construction, maintenance, and reclamation of roads. And, of course, mining of locatable minerals on Forest Service lands is also subject to all federal environmental protection statutes. (Association, Washington, DC - #A19636.65320)

BECAUSE IT WILL MAKE MINERAL EXPLORATION IMPOSSIBLE

Although mineral location technically can continue in these areas, the very classification makes it almost impossible to explore and develop a mine. (Individual, Elko, NV - #A13510.75530)

1066. Public Concern: The Forest Service should recognize that the Surface Mining Control and Reclamation Act of 1977 obviates the need to apply the Roadless Area Conservation Rule to coal mining.

Not only do SMCRA's stringent mining and reclamation statutory provisions and implementing regulations obviate the need for applying the Roadless Rule to coal mining on National Forest lands, but also SMCRA *precludes* the application of the Rule to such coal mining. Here, we reference the Federal lands program mandated by SMCRA [section] 523 (30 U.S.C. [section] 1273), and especially SMCRA's statutory provisions for designating areas unsuitable for coal mining. Id [section] 522, 30 U.S.C. [section] 1272. This long-standing all-encompassing program, discussed more fully below, constitutes the *exclusive* statutory scheme for "roadless" designations of coal mining on National Forest lands. Indeed, the Federal lands program mandated by section 523 of SMCRA and especially SMCRA's section 522 statutory provisions for designating areas unsuitable for coal mining should have weighed heavily in the cumulative impacts assessment contained in the Roadless Rule FEIS. However, it was ignored.

The term "Federal lands" includes National Forest lands. SMCRA [section] 701(4), 30 U.S.C. [section] 1291 (4). The term "surface coal mining and reclamation operations" includes surface impacts incident to both surface and underground coal mining. SMCRA [section] 701(28), 30 U.S.C. [section] 1291(28). And it is the Secretary of the Interior who awards leases of coal on federal lands (with the consent of the Secretary of Agriculture for coal underlying the surface of National Forest lands). 30 U.S.C. [section 201(a). See also 43 C.F.R. [sections] 3400.3-1 and 3400.3-3.

Further, SMCRA [section] 522 establishes procedures and requirements for designating areas unsuitable for surface coal mining. 30 U.S.C. [section] 1272. All federal lands, including National Forest lands, are covered by this statutory scheme.

Thus, under SMCRA, Congress established, with some exceptions, a *per se* category of unsuitability for coal mining on National Forest lands.

This act cannot supersede the clear, subsequent pronouncement of congressional intent articulated in [SMCRA] [section] 552..." Texaco, Inc. et al. v. Andrus, No. 79-2488 (D.D.C., Aug. 15, 1980), appeal dismissed (D.C. Cir. Oct. 21, 1982). This statement applies just as equally to all of the statutory authorities cited by the Forest Service in support of the Roadless Rule; and, therefore, SMCRA

constitutes the *exclusive* statutory scheme for "roadless" designations of coal mining operations on Forest Service lands. To implement SMCRA [section] 523, OSM has promulgated regulations in Subchapter D of Chapter VII, Title 30 C.F.R; and to implement SMCRA [section] 522, OSM has promulgated regulations in Subchapter F of the same Chapter VII. These regulations include and incorporate provisions for designating areas unsuitable for surface coal mining. It is in the Interior Department, Bureau of Land Management's ("BLM") coal management regulations, however, that the Federal lands review required by SMCRA [section] 522(b) and the *per se* unsuitability category for coal mining in the National Forests mandated by SMCRA [section] 522(e) are addressed and implemented. See 43 C.F.R. Subpart 3461 - "Federal Lands Review; Unsuitability for Mining." Briefly stated, here is how this regulatory scheme works.

The Federal lands review is carried out "principally through lands use assessments by the surface management agency." 43 C.F.R. [section] 3461.0-6. This, of course, would mean the Forest Service on National Forest lands. During the course of such land use assessments, the surface management agency (i.e., the Forest Service on National Forest lands) would be required to apply each of 20 unsuitability criteria specified in 43 C.F.R. [section] 3461.5, the first of which is based on SMCRA [section] 522(e) and provides for blanket unsuitability of all National Forest lands. (Association, Washington, DC - #A19636.65310)

1067. Public Concern: The Forest Service should exclude mining lease renewal and modification from application of a roadless designation.

The preamble . . . specifically stated that "Existing coal leases are not subject to the prohibitions." It would appear, however, that even in the case of what sounds like a clear, unambiguous directive for existing coal leases, the devil is in the details. Thus, the FEIS stated in its description of the Rule:

When existing leases expire, any *renewal* would have to be considered in light of the prohibition... In addition, this would apply to any *modification* of existing leases. Prohibition of road construction or reconstruction in inventoried roadless areas may influence reanalysis of lands available for lease when land management plans are revised or amended.

FEIS, Vol 1 at 3-259. This FEIS explanation of how the subsection (b)(7) exception would be applied presents real problems because: (1) existing mine plans rely on future reserves, and if such reserves are not available are routinely *renewed* for 10 year terms after an initial lease term of 20 years as long as there is production from the lease (see 30 U.S.C. [section] 207); and (2) furthermore, *modifications* of existing leases commonly occur in order to make "logical mining units" to increase efficiency, to avoid bypass of federal coal reserves, and for other reasons.

Application of the subsection (b)(7) exception in the manner described by the FEIS would be unworkable. In order for a federal coal lease to be issued, a mineable reserve will have had to be proven through an exploration (usually through drilling) process regulated pursuant to strict state and federal regulation. See, e.g., the Bureau of Land Management's Coal Management Rules at 43 C.F.R. Group 3400. It is simply unreasonable that such a process (often involving a two-or-three-decade time frame) should arbitrarily be derailed by a roadless designation pursuant to the Roadless Rule. This problem must be resolved in any new rulemaking.

This problem must be resolved in any new rulemaking. If the Forest Service insists on including mining within the ambit of a new rule, then as long as federal coal lessees are in full compliance with the terms of the lease, any subsequent renewal or modification should be excluded from application of a roadless designation.

The Companies are concerned that what appeared clear has now become quite opaque. Coal production from *existing* leases may well be in jeopardy. Furthermore, and importantly, because the Forest Service determined that "baseline information for existing leases is not necessary" its estimates of impacts of the Roadless Rule are tainted. (Association, Washington, DC - #A19636.65310)

1068. Public Concern: The Forest Service should recognize that oil and gas leasing is not a project-level decision requiring additional National Environmental Policy Act analysis.

We object to the view that oil and gas leasing is a project-level decision requiring additional NEPA analysis. Although we recognize a lease conveys specific rights subject to terms and conditions of the lease, it must be duly noted that decisions regarding lease terms and conditions are predicated upon the analysis performed in conjunction with the land and resource management plan and decisions regarding land use allocations. As such these decisions are relatively broad in nature, while proposals to drill are project related and site-specific. For example, a separate NEPA decision is required to approve a project proposal on a lease, such as a well, while the leasing decision can be made more broadly through the planning process. This leasing procedure was upheld in Wyoming Outdoor Council v. USDA Forest Service. (Business, Denver, CO - #A25688.65310)

1069. Public Concern: The Forest Service should address short-term safety issues regarding mining activities.

UNTIL THE ROADLESS AREA CONSERVATION RULE IS FINALIZED

The one concern is that the Forest Management Planning process takes a significant amount of time. While the Roadless Area Rule has been enjoined, the effects of the roadless boundary are being felt on the daily operations of the mines. For example, two of the mines are now drilling methane ventilation holes from the surface in order to protect worker safety. However, even though they hold existing coal leases, the roadless area issue is slowing down the approval of the drilling program. It is critical that the Forest Service address these short-term safety impacts that can't wait to be resolved until a revision of the Forest Management Plan is completed. (Elected Official, Delta, CO - #A15550.90711)

1070. Public Concern: The Forest Service should not subject existing mining leases to communalization agreements.

Existing leases within roadless areas should not be subject to communalization agreements unless all leases covered by the agreement are located entirely within the roadless area. (Organization, Charlottesville, VA - #A15659.90720)

1071. Public Concern: The Forest Service should hold companies responsible for environmental damage from oil and gas development.

I believe oil and gas companies should be held accountable and legally responsible for RCRA, NEPA, and CERCLA violations. (Individual, Longmont, CO - #A7449.75600)

1072. Public Concern: The Forest Service should recognize the efforts of the mining industry to preserve the environment and beauty of the grasslands.

The oil and gas industry in North Dakota has operated on the grasslands for nearly 50 years. Our industry and the FS are proud of the ability to develop those lands while preserving the environment and the beauty of the grasslands. The Roadless Initiative gives no consideration to that history. (Business, Bismarck, ND - #A19269.65330)

Adequacy of Analysis

1073. Public Concern: The Forest Service should improve post-plan monitoring of oil and gas developments.

INCLUDE DEVELOPMENT OF AN INVENTORY OF RESOURCE DATA

PLA supports improved post-plan monitoring by the FS. Current monitoring activities have been ineffective and have not been used to determine the effectiveness of planning decisions. While we fully support improved monitoring requirements, we strongly object to the proposal to require a project

proponent to pay for monitoring of site-specific projects. Post-plan monitoring and evaluation is a function of the revised planning process and is the sole responsibility of the FS. Language should be included which requires that all monitoring and evaluations to be made be based upon the best available scientific information, techniques and methods. Also, any decisions based upon this information must be statistically significant in order to justify any change in management. . . . To ensure the oil and gas program is not suspended due to perceptions that cumulative effects exceed acceptable levels, it is critical for the FS to routinely monitor activities. It is of particular importance for monitoring to be done on areas of heightened activities on at least an annual basis. Annual monitoring of activities in these areas will give the FS the opportunity to acquire critical information useful for daily and long-term management flexibility. With advance knowledge of when thresholds are being approached, it will be possible for the FS and project proponents to develop acceptable measures to mitigate or reduce potential effects to an acceptable level. Similarly, the effectiveness of mitigation measures can be tested.

In order for this concept to work, the FS must develop a system for tracking monitoring efforts and results. In addition, a quality control process needs to be put in place to ensure that resource management objectives are clearly stated and measurable. Measurable management thresholds, which when reached require a review of existing management practices, must also be identified. An extremely important element of the monitoring effort is an inventory of resource data. Components of this database, many of which must be reflected on maps, would include: Identification of the area of concern and its ongoing uses.

An inventory of all resource activities, including oil and gas wells, fields, roads, pipelines, recreation, grazing, wildlife habitat manipulation, etc., on state and federal lands.

A yearly survey of companies regarding their future activity plans (the FS must devise a method for protecting proprietary data) so that timely development will be permitted.

A record of current surface disturbance and post-development reclamation for all resource uses (this concept ties in with the "net effects" concept).

A record of new activities that will occur over the long term to help in determining net effects of activities (we recommend the FS use completion reports as the basis for such information).

Archeology and TandE species surveys.

Review mitigation measures to determine their effectiveness.

Review the effectiveness of plan decisions and the accuracy of the NEPA impact analysis.

We also recommend the FS enter into a memorandum of understanding with other federal and state agencies with administrative or management responsibilities in the areas of concern to facilitate collection of the needed resource data. Industry may be able to provide some of the data discussed above.

The overall goal of our net effects and monitoring strategies is to:

Provide an element of flexibility in planning for the oil and gas program on federal lands,

Eliminate the need for repetitive NEPA documentation for exploration and development activities,

Provide incentives for mitigation and swift reclamation of dry holes, temporary access roads and well pads, and create a system for resource management planning, which can serve as a tool for industry, organizations and government agencies in the pursuit of their interests and missions. Increase the FS efficiency and data exchange with other surface management agencies. (Business, Denver, CO - #A25688.65300)

1074. Public Concern: The Forest Service should prepare a reasonably foreseeable development scenario for analysis of effects of oil and gas development.

WHICH ANALYZES THE NET EFFECT OF LONG-TERM SURFACE DISTURBANCE RATHER THAN THE NUMBER OF WELLS TO BE DRILLED

In order to maintain flexibility in the planning documents, PLA recommends that the FS utilize the following approach when conducting its analysis on the potential effects of oil and gas development:

NET EFFECTS OF REASONABLY FORESEEABLE DEVELOPMENT

During the land use planning process, the FS must predict the post-lease impacts that could occur from oil and gas development by preparing a reasonably foreseeable development (RFD) scenario. This forecast is normally based upon local geologic trends, currently proposed and historical activity within the planning area. As part of the RFD scenario, the FS typically quantifies the number of **wells** it anticipates will be drilled in the planning area over the life of the plan. The FS also estimates the average surface disturbance associated with wells in the area. This is accomplished by calculating average acreage disturbance figures for well pads, access roads, pipelines, facilities, etc.

This information is then used as the basis for determining environmental consequences of oil and gas exploration and development activities in accordance with each management alternative analyzed. It should be noted that while the number of wells drilled can vary by management alternative, the projected level of disturbance associated with the average well remains the same under this approach. Currently, the FS uses as its baseline for determining environmental consequences of each alternative the number of wells which could be drilled, both exploration and development, rather than net acreage disturbed by oil and gas operations. As such, the FS often fails to consider that once a well is plugged, reclaimed and abandoned, it has no adverse effect on the environment. For example, if the FS predicts 10 wells may be drilled with 5 acres disturbance each, up to 50 acres could be disturbed. We propose, however, if 5 of the 10 wells are dry and subsequently reclaimed, they should not be counted as part of the acceptable level of **long-term** impacts established in the analysis because they were short-term disturbances. Hence, industry should be given the opportunity to drill additional wells, provided they would not result in more than 25 acres of additional surface disturbance or would not exceed an acceptable level of surface impact as determined in the land management plan or post-plan monitoring. Moreover, if 10 additional wells could be drilled without exceeding the established threshold of surface disturbance, they should be allowed since they would fall within the acceptable range established during planning. The key element which must be considered in determining what level of oil and gas activity will be allowed over the life of the plan is **not** the number of wells which could be drilled, but rather the **net effect** of surface disturbance and activities.

This **net effect** approach is consistent with the newly adopted ecosystem management strategy because it relies on scientific data to establish suitable levels and patterns of use. The **net effect** approach will also have the added benefit of facilitating better land use planning and encouraging multiple-use activities, including oil and gas leasing, exploration and development, on federal lands. (Business, CO - #A25688.65300)

1075. Public Concern: The Forest Service should obtain input from the Bureau of Land Management regarding leasing areas included in the roadless inventory.

With regard to minerals, which of course, are of great interest to Oxbow Mining, the USDS should obtain input from the BLM as it makes decisions relating to unprotected resources. In our area of interest the USDA would discover that by a decision effective October 21, 1973 the Department of the Interior through the BLM established the Paonia-Somerset Known Coal Leasing Area. Subsequently, as a result of the Federal Coal Leasing Amendments Act, which was adopted in 1976, these previously designated KCLAs were reclassified as Known Recoverable Coal Resource Areas. These are designated areas that the Bureau of Land Management has deemed after extensive study to have valuable coal resources and potential coal bed methane resources as well. I am confident similar studies have been done by the USGS or the BLM with respect to oil and gas resources. If such an analysis had been done by the USDS in our areas, then it would appear to me that it would have resulted in exclusion of the 160 acres that have been included in the roadless area but also are in conflict with a federal coal lease, for after all coal resources of this value are most certainly limited resources which should be protected for development. (Association, Denver, CO - #A29223.65320)

1076. Public Concern: The Forest Service should address the amount of oil reserves which lie under National Forest System lands.

Currently, 67% of the known oil reserves in the U.S. lie under federal lands. However, access to those lands has decreased by 60% in the past ten years. The nation's dependency on foreign oil has increased to 56% on a daily basis and is expected to climb for the foreseeable future. Responsible access to oil and gas reserves is critical to our nation's energy supply; moreover, the proposals fail to consider the 21

trillion cubic feet (TCF) of natural gas that underlie available FS lands, as noted in the recent National Petroleum Council Study. (Business, Bismarck, ND - #A19269.65330)

1077. Public Concern: The Forest Service should use accurate data to estimate the percentage of coal that comes from National Forest System lands.

This extraordinary analytical gap was addressed directly by the Department of Energy ("DOE"). As noted in the preamble to the Roadless Rule, following publication of the FEIS in November 2000, DOE provided information on affected coal resources to the Forest Service. The DOE analysis shows that the Roadless Rule, likely, will affect three existing coalmines in Western Colorado sterilizing at least 250 million tons of high quality, low sulfur coal. As a frame of reference, this lost coal in Western Colorado alone (which, of course, would be produced over a period of years) represents almost 25% of last year's *total* national coal production of 1.1. billion tons.

In addition, the significance of National Forest lands as a source of high quality, low sulfur coal was downplayed by the Forest Service. The preamble to the Roadless Rule stated that the "FEIS described the coal production from [National Forest] lands as accounting for about *7% of national production* in 1999." However, as shown in recent National Mining Association ("NMA") testimony to the Congress:

This statement implies that tightening up access simply will not have much impact on energy production from National Forest Service land. However, last year the Black Thunder Mine in Wyoming alone produced over 60 million tons of coal, which represents over 5% of national production by itself. The Black Thunder Mine is located in the Powder River Basin of Wyoming and is located on the Thunder Basin National Grasslands, which is managed by the National Forest Service. In speaking with Forest Service personnel, it was learned that they do not have a good method of estimating coal production from National Forest Service lands. A quick survey of some of the producers on the Thunder Basin National Grasslands revealed that these few mines in Wyoming accounted for 8-10% of national coal production. This completely ignores coal production from National Forest Service lands in Colorado and Utah. If accurate data were used, *the percentage of national coal production from National Forest Service Lands could very likely be 15-20%, which is a very significant percentage.* (Association, Washington, DC - #A19636.65330)

1078. Public Concern: The Forest Service should analyze oil and gas resource potential in roadless areas.

The Colorado Oil and Gas Association ("COGA") is a member organization representing the majority of oil and gas producers in Colorado, as well as allied service, supply, gathering and processing, transmission, gas distribution and power generation sectors. Colorado Oil and Gas Association is strongly opposed to the proposed prohibition of road construction on 58 million acres of "inventoried" roadless areas, including 4.4 million acres in Colorado, as well as the mandate to local forest supervisors to manage smaller parcels for "roadless values."

Prohibition of road construction on nearly one-third of the national forest system is tantamount to an abandonment of the statutory multiple use mandate applicable to these lands. With respect to oil and gas exploration and development, it is essentially the same as new wilderness designation. The nation can ill afford to lock up huge areas of the public land base with no regard to the potential for impairing our ability to supply the energy necessary for our citizens and the economy. The EIS's qualitative discussion about "increased exploration costs" resulting from the roadless proposal is disingenuous to say the least. Prohibition of lease road construction will preclude development of public oil and gas resources.

The EIS has no quantitative analysis of the oil and gas resource potential that would be foregone. COGA members have been unable to obtain timely, detailed mapping information in order to assess impacts of the proposal on existing lease development. In at least one case, however, the proposal would preclude additional drilling on a portion of a producing federal gas unit that has generated over 62 billion cubic feet of gas. Federal gas royalties attributable to the portion of the unit that would be off-limits exceed $2.3 million. This, despite the fact that there are two wells with existing lease roads in the heart of the proposed roadless acreage. (Business, Denver, CO - #A27325.65320)

THROUGH A PUBLIC LANDS INVENTORY OF HYDROCARBON POTENTIAL

The roadless area proposal is an example of irresponsible, negative action by the government that would foreclose access to the gas resource base without knowledge of its size and potential. It would represent one arm of the government acting at cross-purposes with clear public policy goals expressed by another arm of the government.

COGA asserts that the roadless area proposal should be withdrawn unless and until a public lands inventory of hydrocarbon potential has been completed and incorporated into the analysis, including the impact access restrictions. (Business, Denver, CO - #A27325.65320)

1079. Public Concern: The Forest Service should accurately assess the impact of the Roadless Area Conservation Rule on energy potential.

ON THE LITTLE MISSOURI NATIONAL GRASSLAND

The Forest Service actually represented to the public that the roadless regulation would not interfere with energy production. 66 Fed. Reg. 3244, 3249, 3261 (2001) (less than 1 million acres of high potential land affected). In response to a letter sent by the Western North Dakota counties, the Forest Service did not identify the roadless rule as having any effect on leasing but that about 72,890 acres were “not available” due to management direction or other administrative decisions. Letter of Frederick Norbury to Constance Brooks, April 25, 2001. These statements cannot be reconciled with other Forest Service documents that at least half of the 182,000 acres that the Forest Service classified as high potential, would be closed or restricted to energy development, Vol. 17, 1950-3/Minerals/5903.pdf. The Forest Service decided in December 2000 to impose no exception for oil and gas development on the basis that it was not a “widespread” problem. This conclusion certainly contradicts the Administration’s energy direction and policy and suggests that earlier assurances that the roadless rule had minimal impact on production were mistaken. All of these acreage figures do not address the other 36,000 acres of designated roadless conservation areas.

It is likely that the Forest Service has understated the energy potential on the Little Missouri National Grassland, especially since virtually all of the roadless areas have been under lease at some time, and much of the area is still under lease. (Organization, Denver, CO - #A21358.10135)

IN WYOMING

We are concerned that the geological analysis underlying these rules, which will have a profound effect on the State of Wyoming, is inadequate. Due to the extremely large area of coverage (continental scale) of this document, it must cover areas of tremendous diversity and differences. To lump natural resource issues in Wyoming with the same issues in Arizona or Alabama necessarily results in a superficial analysis, which cannot be accurate and detailed. As a result, we cannot have sufficient understanding of specific issues for any area of the county, much less Wyoming. For example, Wyoming has substantial platinum and palladium resources that could be put off limits but the proposed rules, yet the document does not mention the resource, much less evaluate the impact of shortages of these vital metals on the national economy. (State Agency, Cheyenne, WY - #A22609.65000)

1080. Public Concern: The Forest Service should address the overall process of mineral exploration.

THROUGH DETAILED STUDIES ADDRESSING MINERAL POTENTIAL IN ROADLESS AREAS

I strongly urge the Forest Service to give full consideration to the overall process of mineral exploration and development as it applies to access. Complete detailed studies addressing mineral potential and necessary access are imperative and essential to developing balanced national forest plans that include domestic mineral development. (Individual, Reno, NV - #A21755.65320)

1081. Public Concern: The Forest Service should provide a legal review to determine whether the Roadless Area Conservation Rule can prohibit access to mining claims.

Prior to adoption of the proposed action, we suggest that a legal review be conducted to determine if administrative action of this nature can prohibit access to mining claims on the NFS lands. (Elected Official, Roseburg, OR - #A11811.65310)

1082. Public Concern: The Forest Service should justify its claim that inventoried roadless areas would be among the last areas entered for exploration and development.

To point out one more important error in the Forest Service's underlying analysis of impacts on coal mining production and reserves, in the face of the aforementioned DOE comments and those of NMA and others (including the Companies), the Forest Service replied in the preamble" . . . even if resources do underlie inventoried roadless areas, they would be among the last areas entered for exploration and development . . . ." This assertion is not supported in the administrative record of the Roadless Rule.

Indeed, to the contrary, and by way of example, coal reserves underlying inventoried roadless areas adjacent to Arch's West Elk Mine in Colorado would be among the *first* areas entered into for exploration and development (not the last) in the next phase of that mine . . . . Indeed, Arch is currently experiencing some Roadless Rule-based resistance from Forest Service officials regarding the need to enter into those areas, as is discussed further in Section VIII.2 of these comments. (Association, Washington, DC - #A19636.65330)

Allow Mining, Oil, and Gas Development

1083. Public Concern: The Forest Service should ensure access for mining.

Despite the fact that Roadless Area rule has been enjoined, and has not been implemented, there is still a proposed stipulation to the Lease Modification that "road building prohibition will apply to this lease modification." The environmental community has used the fact this area has been designated as an IRA (although enjoined) to block the ability of the operator to access the surface for activities necessary to produce from the mining lease. (Business, Wright, WY - #A23085.45500)

Access for the exploration of locatable minerals pursuant to the General Mining Law of 1872 is not prohibited by this rule. Nor is reasonable access for the development of valid claims pursuant to the General Mining Law of 1872 prohibited. In some cases, access other than roads may be adequate for mineral activities. This access may include, but not limited to, helicopter, road construction or reconstruction, or non-motorized transport. Determination of access requirements for exploration or development of locatable minerals is governed by the provisions of 36 CFR part 228. (Individual, Cottage Grove, OR - #A27337.40000)

AS REQUIRED BY LAW

We argue that the proposed rule takes away the public right of access to minerals on public lands. Any review of statutory and judicial case law proves that the Forest Service does not have authority to promulgate rules or regulations that prevent access to public lands for prospecting, locating and developing mineral resources. From the 1872 Mining Law, to the Organic Administration Act of 1897, to the Multiple-Use and Sustained-Yield Act, Congress has maintained that nothing shall be construed so as to offset the use or administration of mineral resources of national forest lands. By enacting the proposed rule, the Forest Service oversteps its authority by denying public access to designated mining areas. (Association, Pocatello, ID - #A20842.65320)

AS REQUIRED BY THE FOREST SERVICE MANUAL AND REGULATIONS

Forest Service Manual and Regulations Specifically Acknowledge Right of Access.

The Forest Service Manual Chapter on Mining Claims (Chapter 2810) specifically acknowledges right of access to a mining claim: The right of reasonable access for purposes of prospecting, locating and mining is provided by statute. Such access must be in accordance with the rules and regulations of the Forest Service. However, the rules and regulations may not be applied so as to prevent lawful mineral activities or to cause undue hardship on bona fide prospectors and miners. Forest Service regulations also emphasize protection of miner's right to access. (See 36 CFR 228.1—mining laws confer a statutory right of entry and 36 CFR 261.1(4)(b)—regulatory prohibitions shall not preclude activities authorized under the Mining Law). (Business or Association, Washington, DC - #A29622.65320)

EXCEPT IN WILDERNESS AREAS

NWMA would add that permitting aerial access only or precluding surface occupancy can only legally be applied by the Forest Service in designated Wilderness Areas, and then, only in certain circumstances.

The Wilderness Act of 1964 specifically states that "in any case where valid mining claims or other valid occupancies are wholly within a designated national forest wilderness area, the Secretary of the Agriculture shall . . . permit ingress and egress to [claims] by means which have been or are being customarily enjoyed with respect to other such areas similarly situated." (Association, Spokane, WA - #A17351.65320)

1084. Public Concern: The Forest Service should allow mineral, oil, and gas exploration and extraction in roadless areas.

On the national level the Department of Energy study, "Undiscovered Natural Gas and Petroleum Resources Beneath Inventoried Roadless and Special Designated areas on Forest service Lands analysis and Results", shows that of the 208 oil and gas lays examined, 116 are affected by the roadless rule. It is estimated that 11.3 trillion cubic feet of natural gas would be unavailable for exploration and development activities. In Montana, the Rocky Mountain Division of the Lewis and Clark National Forest has been estimated to contain a minimum of 1 tcf of gas. The Beaverhead and Deerlodge National Forests also are gas potential areas. The Missouri Breaks National Monument has estimated reserves of 1 bcf of natural gas. The Breaks are BLM lands, but this monument added to the Roadless Initiative, the recently adopted transportation rule, roads manual, as well as Forest Service planning regulations that fail to integrate oil and gas resources in land use considerations, create an inextricably linked agenda aimed at precluding multiple-use activities on federal public lands.

MPA is encouraged by the Energy Policy put forward by the Administration. We hope the balanced approach to all energy resources in that document can guide the Forest Service and the BLM in their land use planning, including any plans for unroaded and roadless areas. With that guidance for energy resources, MPA believes existing planning processes are adequate to protect wildlife, watershed and recreational amenities on the National Forest system (NFS) while preserving multiple-use. (Business, Helena, MT - #A29111.50200)

Locking up the natural resources as de facto wilderness is wrong. Exploration for the extraction of oil, gas, coal, and minerals should be allowed in the forests. (Individual, Miami, AZ - #A880.90100)

Existing mining activities, if following environmental regulations should be permitted continuing the scope of present activities. (Individual, Painted Post, NY - #A357.90000)

I believe it would be in the best interest of the country to exempt oil and gas exploration and production from any future rule(s) that would, in any way, limit the building of roads in National Forests. Our critical reserves of oil and gas must not be locked away administratively. (Individual, Denver, CO - #A4566.90710)

TO HELP LOWER THE COSTS OF FUEL IN THE UNITED STATES

If there is oil there we can use to help lower the costs of fuel in the US why not tap into it? In this day and age there are ways to do this without destroying the area and it would have to be carefully planned. (Individual, No Address - #A4764.90710)

BECAUSE HARDROCK MINERALS ARE CRITICAL COMPONENTS FOR DEFENSE TECHNOLOGIES

Hard-rock minerals produced from National Forest lands comprise critical facets of many of the nation's most advanced and vital commercial and defense technologies. (Association, Washington, DC - #A19636.65340)

ONLY IF COMPANIES AGREE TO CLEAN UP EXISTING SUPER-FUND SITES

As for mining interests that want to continue poking holes in the ground like the thousands that surround the town I live in, I can only lend my support to their cause if they will take care, out of their own pockets, of all the super fund sites caused by the previous rapers. The cleanup of these mining sites is coming out of the pockets of the taxpayer. Let those that stand to profit from a relaxed administration's "guarding" of the public trust start with Leadville, Colorado and proceed with all the other messes created by their industry and then once that task is accomplished I will lend my support to their ways. They too want it all without any accountability. By any measure, they are unreasonable. (Individual, Crested Butte, CO - #A30745.65370)

1085. Public Concern: The Forest Service should allow mineral, oil, and gas exploration and extraction by various methods.

BY SLANT DRILLING OR OTHER TECHNIQUES WHICH DO NOT DISTURB THE SURFACE

The roadless areas should be withdrawn from mining and mineral leasing, <u>except</u> in cases where areas can be leased for oil and gas production using a no surface occupancy (NSO) stipulation which would allow for extraction by slant drilling or other techniques which don't disturb the surface of the land inside the roadless area. I think slant drilling is a viable technology that could open up some areas to mineral production without having to build new roads. (Individual, Vail, CO - #A5371.90721)

BY MANUAL MEANS ONLY

Mining should be restricted to manual means only. (Individual, Cleveland, SC - #A21250.90720)

1086. Public Concern: The Forest Service should allow mineral, oil, and gas exploration and extraction in certain areas.

IN THE ROCKY MOUNTAINS

The National Petroleum Council's December 1999 to the Secretary of Energy found that significant access restrictions already restrict or preclude development of some 137 trillion cubic feet (TCF) of known natural gas reserves in the Rocky Mountains, twice as much as is unavailable off the coastal U.S. How can the domestic petroleum industry find and develop the resources to satisfy the NPC's identified need for an additional 7 TCF of annual gas production by 2010 if we continue to lock-up the public lands essential to meeting that demand? (Business, Denver, CO - #A27325.65320)

IN THE ROCKY MOUNTAIN STATES

The National Petroleum Council's study, "Natural Gas, Meeting the Challenges of the Nation's Growing natural Gas Demand," has projected that 460 trillion cubic feet (TCF) of natural gas remain within the Rocky Mountain States. The FS controls approximately 8 percent of the 288 TCF occurring on federal lands. Up to **(21 TCF**) of natural gas is projected to underlie these lands. Of additional concern, another 2 percent of the land base is estimated by the NPC to be threatened by potential new wilderness designations. Nowhere in any of the roadless documents has the FS given any consideration of this vast resource nor the consequences the roadless initiative will have upon industry's ability to explore for and develop this clean fuel source.

The Department of Energy Study, Undiscovered Natural Gas and Petroleum Resources beneath Inventoried Roadless and special Designated Areas on Forest Service lands analysis and Results

examined 208 oil and gas plays. Of those 208 plays, 116 are affected by the roadless rule. It is estimated that 11.3 trillion cubic feet of natural gas would be unavailable for exploration and development activities. While the nine largest plays in the study make up around 14% of the roadless areas, these areas represent **(83%)** of the gas resource contained in the inventoried roadless areas. PLA was involved in helping develop the parameters of this study, and despite criticism by those opposed to energy exploration and development in these areas, the study agencies to reduce impediments to energy development and to take actions of expedite energy-related projects, it is important for the Forest Service to reconsider its roadless program and its impact on the energy resource availability. (Business, Denver, CO - #A29112.65330)

IN COLORADO AND UTAH

Allow for the development/designation of coal/energy producing regions within the national forests, particularly in Colorado and Utah**.** (Business, Wright, WY - #A23085.90710)

IN UTAH

In 1991, PacifiCorp submitted a Lease by Application ("LBA") in the North Trail Mountain/Cottonwood Creek Area of the Forest that contains 75 million tons of recoverable coal. This coal lease tract is now held by the State of Utah because of the 1998 coal land exchange ("1998 Exchange") between the State and Federal Government resulting from the establishment of the Staircase-Escalante National Monument ("Monument"). See Utah Schools and Lands Exchange Act of 1998, Pub. L.No. 105-335, 112 Stat. 3139 (Oct. 31, 1998). As much as 25 percent of the state and federal coal leases held by PacifiCorp are in inventoried roadless areas, including the area of the LBA, a substantial reserve of coal mine operator. This outcome could occur despite significant industry interest in exploring around these areas on the Wasatch Plateau for more economically recoverable coal deposits. New leasing and Plateau for more economically recoverable coal deposits. New leasing and exploration, however, would require surface access roads to determine quality, quantity, geology, and engineering conditions and to control, minimize, and mitigate any damages from mining-induced subsidence.

PacifiCorps's current lease development activities and future leasing opportunities could also be significantly impaired by the Roadless Rule on its 1998 Exchange.

PacifiCorp is concerned that the delay and expense resulting from the requirement for EIS preparation to conduct any exploration that might be allowed in roadless area, as well as forest plan amendments and revisions precipitated by the Roadless Rule will impose substantial costs and delays in data acquisition. As a result, significant amounts of economically recoverable coal may be bypassed.

Application of the Roadless Rule to the areas covered by the LBA and the Mill Fork lease resulting in the bypassing of these two significant reserves is contrary to the purpose and intent of establishment of the Monument and the 1998 Exchange.

PacifiCorp is grateful that the Forest Service in its Roadless Rule acknowledged that the reserves granted to Utah in the 1998 Exchange "would be considered outstanding rights," FEIS, Vol. 1 at 3-258, and, thus, the construction of portal and transportation facilities necessary for the development of these resources, "as an outstanding right . . . would be excepted from the prohibition alternatives," FEIS, Vol. 1 at 3-260. See also 66 Fed.Reg. at 3265 (access to Utah state-owned coal would be guaranteed based on existing rights). *But, the mere designation* of the areas within which Utah was granted coal reserves and within which PacifiCorp plans to conduct lease development activities thwarts the intent of Congress and denies Utah and its lessees the full benefit of the bargain struck in the 1998 Exchange.

It was understood by the parties to the 1998 Exchange that the resources granted to the State of Utah could be developed subjected only to generally applicable environmental laws without any special encumbrances on the development of the coal resources. (Association, Washington, DC - #A19636.65330)

The Roadless Rule does not purport to repeal any of the multiple-uses on the lands involved, but it very well might have that effect. For example, in Utah, some of the "inventoried" tracts of land are over the Central Utah coal reserves. These coal seams may only be mined by underground techniques, so there is no danger of the effects of surface mining. Yet, in order to offer these tracts up for leasing, and then lay out the necessary mining sequence plans, and thereby obtain the necessary financing for the operations,

test core sampling holes must be drilled from the surface. This requires a road to the drill sites. This road could be reclaimed immediately after use. But the Roadless Rule does not even allow for temporary roads. If time had been taken to examine these and other issues, perhaps a carefully written local stipulation could have been crafted for these coal areas.

Similarly with the general mining laws of the nation. Because general prospecting for minerals is not prohibited by the Roadless Rule (and if otherwise allowed by forest plan revisions), any person who discovers valuable mining resource because of the inability to build a road. The Roadless Rule therefore has the effect of closing the areas to future mineral prospecting, leasing and mining. The state demonstrated in its comments of July 17, 2000 that there are areas with such resources which are known today. (State Agency, Salt Lake City, UT - #A20742.65320)

IN THE NATIONAL MONUMENT IN UTAH

Why don't you open the national monument in Utah to the huge supply of clean-burning coal locked up by Clinton. . . . Open up our national forests and monuments to the much needed raw materials they contain. (Individual, Oceanside, CA - #A27306.90100)

IN THE MANTI LASAL NATIONAL FOREST

Historic activities, such as coal mining on the LaSal National Forest, should expressly and presumptively be allowed. The Roadless Area FEIS clearly noted that local economies are highly dependent on these activities. It also correctly notes that the economies of these rural communities are highly inelastic. (Business, Wright, WY - #A23085.90710)

IN MONTANA

Part of the Forest Planning process involves making inventories of the mineral resources in roadless areas. These inventories show substantial regions of high mineral potential in the roadless lands of Montana's National Forest. Was the gathering of these inventories a mere empty exercise? What provision will be made to provide future access to these areas of high mineral potential? (Organization, Missoula, MT - #A28141.65320)

IN NORTH DAKOTA

In North Dakota the roadless conservation areas have been under *de facto* wilderness management since the late 1990s. The Forest Service has not approved or offered for sale any leases located in these roadless areas. *See e.g*. DPG FEIS, App. C. 127, 132. The Forest Service has objected to and threatened counties who proposed road rehabilitation and construction. These two policies combined to delay and interfere with energy development. The roadless administrative record (RAR) states that at least half of 182,000 acres classified as high oil and gas production potential will be closed to energy development or greatly restricted. RAR, Vol. 17 1950-3/Minerals/5903.pdf. The impact of roadless designation on county governments, revenues, access, and local industries is significant. See HAND comments on economic costs of proposed wilderness. The comments were written before the spike in oil prices and the increased demand for energy. The Department of Energy (DOE) sharply criticized the roadless rule for its effects on energy development. However, the DOE report addresses potential production in the Rocky Mountain Front and ignores North Dakota, which actually produces half of the oil and gas produced in the National Forest System. The Forest Service internally admits that the roadless designations interfere with likely development in these areas. The cost in terms of state revenue, county revenues and national energy policy has been largely unquantified. These areas were entirely leased in 1987 but the low development management prescription has actively discouraged drilling and production. By 2001, many of the leases were not extended or renewed. The Forest Service FEIS admits that they declined to renew or issue leases due to "management policy." DPG FEIS, App. C 134. Given the lack of wilderness qualities, the comparative value of the land for energy production and continued agriculture use greatly outweigh the other uses. (Organization, Denver, CO - #A21358.65300)

IN THE DAKOTA PRAIRIE GRASSLANDS

The Dakota Prairie Grasslands are a vital component of North Dakota's economy. They provide 27% of the state's oil production and contain 30% of the state's producing wells, providing nearly 1,000 jobs. The oil industry's activities on the grasslands bring in nearly $15 million per year in tax revenues and

only temporarily disturb a very small portion, less than one-half of one percent of the grassland's surface area.

The oil and gas industry in North Dakota has explored in and drilled upon the grasslands for nearly 50 years and has restored over 500 wells and 480 miles of roads, or 45% of all roads constructed by the industry.

The oil and gas industry and other users, including wildlife, can co-exist in the Dakota Prairie Grasslands because reclamation is fast, effective, and very successful. That may not be true in National Forests in other states where reclamation can be more of a challenge.

The Tesoro Refinery in Mandan receives 36% of its supply from the grasslands, the Roadless Initiative places the future of the refinery at risk because it eliminates potential new wells and pipeline rights of way. The future of the refinery is vital to the State and local economies, as well as the national interests in continuing to meet the demand for gasoline and other refined crude oil products. (Business, Bismarck, ND - #A19269.65330)

IN ALASKA

New roads may be required for the development, under strict guidelines, of a sound National Energy Policy. A group of Americans would deny oil exploration in Alaska, when such action would cause little change to this area (affecting only a very small amount of land) and would be of great benefit for this country. (Individual, Albuquerque, NM - #A5739.65300)

IN THE ABSAROKA-BEARTOOTH WILDERNESS

In considering the designation of the Absaroka-Beartooth Wilderness in 1978, Congress specifically drew the boundaries to exclude the Stillwater deposit. Through the Roadless Rule, however, the Forest Service could well thwart by regulation that carefully considered legislative decision. Congress had extensive mineral information in making its determination to designate that Wilderness.

As we have discussed previously, *application* of the Roadless Rule directly contravenes express congressional intent to allow unimpeded development of the important Stillwater mineral resources. (Association, Washington, DC - #A19636.65310)

IN BIG SPRINGS AND JERRIT CANYON

Under the January 12 rule, exploration and development activities will be significantly reduced or eliminated in the "roadless area" between Big Springs and Jerritt Canyon. The delay of years and the EIS expense of hundreds of thousands to a million dollars or more will be prohibitive to almost any exploration project. There is a significant potential for the loss of an otherwise economic resource and the associated loss of local jobs. Thus, the important value of economic well being for nearby communities must be considered.

Thus, the January 12 Rule must be modified to ensure that reasonable road access is preserved in roadless areas in order to explore for and develop locatable mineral resources pursuant to the 1872 Mining Law and the intent of Congress in designating wilderness area boundaries, and to maintain local economic vitality. (Association, Spokane, WA - #A17351.65320)

BY MINING OPERATIONS CONTROLLED BY THE STILLWATER MINING COMPANY

Two significant portions of the Stillwater platinum/palladium ore deposit fall within inventoried roadless areas in both the Custer and Gallatin National Forests, comprising an estimated 25 percent of the deposit. Effective future operation of the Stillwater Mine will require new roads in these areas. Roads will be required for the construction of ventilation shafts and emergency escape ways vital to ensure mine safety. Helicopters or other alternative transportation methods will not be adequate and, even where such alternatives could be used, significant increased costs would be imposed on Stillwater. Thus, the Roadless Rule threatens significant harm to the operation of this unique and important mine. (Association, Washington, DC - #A19636.65320)

The January 12 rule seriously affects not only ongoing and planned development and production activities of SMC (Stillwater Mining Company) but also future mineral exploration activities of SMC and other companies. Significant areas of the SMC mining claim group along the complex are adversely

affected. Roads will be required to construct additional ventilation shafts and escape ways to maintain safe operation of the mine. Delays in approval of surface activities necessary for underground operations will increase the cost to the company and may reduce the amount of economic reserves. Bypassed mineralized areas may be lost. Expensive changes in mining methodology may be required. In addition, the January 12 Rule illegally threatens to halt further exploration activities in the Stillwater complex. (Association, Spokane, WA - #A17351.65330)

BY MINING OPERATIONS CONTROLLED BY BURLINGTON RESOURCES OIL AND GAS COMPANY L.P.

Burlington Resources Oil and Gas Company L.P. (BR) is filing these comments to reiterate our specific concerns with respect to possible implications of any proposed Forest Service (FS) Roadless Area policy on any BR mineral or leasehold acreage owned or to be acquired by BR and to seek clarification that our acreage will be exempted from any new restrictions on access to it. (Business, Midland, TX - #A22626.91110)

1087. Public Concern: The Forest Service should clarify that mining leases issued by the Bureau of Land Management will not be affected by the Roadless Area Conservation Rule.

Clarify that coal lease renewals and Logical Mining Units, issued by the Bureau of Land Management, have valid existing rights, and that the roadless area prohibitions will not apply to these administrative functions. (Business, Wright, WY - #A23085.65310)

IN GUNNISON COUNTY

The land area of Gunnison County includes 86% public lands of which a significant portion is currently designated as either wilderness or roadless. Although we highly value our wilderness and roadless areas, as they to play an important role in our economic well being, the proposed rulemaking needs to identify a careful mechanism to support present operations like the existing coal mines which are particularly impacted by this rulemaking. (Elected Official, Gunnison, CO - #A22061.10112)

1088. Public Concern: The Forest Service should exempt geothermal leases from the Roadless Area Conservation Rule.

INCLUDING NEW GEOTHERMAL RESOURCE AREAS IDENTIFIED BY THE BUREAU OF LAND MANAGEMENT

On behalf of Mammoth-Pacific LP, I am writing to provide comments on Phase II of the U.S. Forest Service's roadless initiative. Specifically, we request that geothermal leases be specifically exempted from the initiative.

Located in Mono County, California, Mammoth Pacific facilities generate up to 40 megawatts of renewable, environmentally sound electricity, which can power approximately 40,000 homes. This electricity, which is generated by using the earth's natural heat, displaces the need to use fossil fuels for power generation, and has no combustion emissions. For natural gas, that is a reduction of over two billion cubic feet per year and over one hundred thousand tons of carbon dioxide per year. In addition, with an annual payroll of over $1.4 million, Mammoth Pacific plays an important role as a local employer and as one of the largest property tax payers in Mono County. The G3 facility, located on public land, also paid $1 million in royalties to the Minerals Management Service in 2000 for electricity sales.

Mammoth Pacific has obtained and currently maintains geothermal steam leases on U.S. Forest Service lands, some of which are in areas included in the roadless initiative. Although we strongly support your efforts to protect our natural resources, we believe that this initiative may have the unintended consequence of restricting these leases and these leases of other geothermal resource areas.

As Congress and the Administration look for environmentally sound solutions to our energy crisis in California and elsewhere, efforts to restrict existing geothermal leases is inconsistent with laws and public policies specifically aimed at diversifying our nation's energy production sources and reducing our nation's dependence on fossil fuels. Geothermal energy is an environmentally sound alternative source of energy that has no significant impact on the environment.

Furthermore, if the roadless initiative impairs the lessor's rights to develop the geothermal resources that occupy the lease to any extent, it takes value from the lease—a lease that the lessor has tried in good faith to maintain and enhance under the terms of its lease(s).

For these reasons, we believe that existing geothermal leases should be specifically exempted in the roadless initiative.

In addition, we understand that the Bureau of Land Management (BLM) has been directed by the Administration to review and update its knowledge of geothermal resource areas with the intent of possibly adding new lease areas. If the roadless initiative includes new geothermal resource areas identified by the BLM, these areas should also be exempt. (Organization, Mammoth Lakes, CA - #A17659.91710)

Do Not Allow/Restrict Mining, Oil, and Gas Development

1089. Public Concern: The Forest Service should not allow mineral exploration in roadless areas.

New mining/drilling activity should be prohibited. (Individual, Painted Post, NY - #A357.90000)

I urge you to uphold President Clinton's ban on road building and logging in our national forests. But the ban should do more: it should also prohibit all extractive activities, including mining, and oil and gas pumping. It should prohibit all power vehicles. And it should apply to all our forests—from the smallest to that great national treasure, the Tongass. (Individual, Candler, NC - #A160.90110)

Mining, oil and mineral exploration should be prohibited. (Individual, No Address - #A565.90720)

Mining has the potential to impact all of the ecological and amenity values of roadless areas that the Forest Service is committed to protecting in this process—from water quality to solitude. Mining access roads are as destructive as logging roads and are often driven deep into the most remote roadless area watersheds. Mine sites can become permanent scars on the land.

Speculators use the Mining Law to file nuisance claims or to mine the pockets of investors and citizens of the United States. While these activities can seriously degrade the ecological, recreational, and aesthetic values of roadless areas and can cost the public millions of dollars, they seldom produce minerals that benefit the public. Many impacts from mining are wholly unnecessary for the reason that they either take place on mining claims that do not support the discovery of a valuable mineral deposit, and are therefore, not valid, or are associated with access to mining operations on invalid claims. According to the Department of Interior, "Rights to mine under the general mining laws are derivative [of] a discovery of a valuable mineral deposit and absent such a discovery denial of a plan of operations is entirely appropriate." Recreational miners, while failing to meet the requirements of the 1872 Mining Law, are granted the privileges to impact sensitive riparian areas and ecologically valuable low gradient stream reaches beyond those accorded any other use of the national forests.

Specific examples of the impacts of mining on roadless areas can be found in the North and South Kalmiopsis roadless areas comprising approximately 190,000 acres adjacent to the Kalmiopsis Wilderness on the Siskiyou National Forest in southwest Oregon. (Organization, Cave Junction, OR - #A17235.90720)

There is an exquisite stream in Siskiyou, Rough and Ready Creek, that harbors along its banks a number of rare and fragile plant species that don't exist anywhere else; and there is a miner claiming over 4000 acres along and around that creek who is attempting to force the federal government to let him mine and remove rock and ore samples in whatever way he chooses, or else pay him $600,000,000. The operation he has in mind for his Nicore mine is unlikely to come close to paying that kind of money, and it would destroy the Rough and Ready area. I don't believe the Rule would be enough to make him give up completely, but it would help enormously in protecting Rough and Ready and other such pristine places from being devastated by unimpeded mining activity. (Individual, Medford, OR - #A15234.10110)

1090. Public Concern: The Forest Service should not allow mineral exploration by various methods.

ACID MINE DRAINING

If land is being cleared for mining, one of the most significant negative impacts is acid mine drainage. This can lead to extensive damage to soil and potable water supplies. (Individual, East Aurora, NY - #A6187.65360)

GOLD MINING TECHNIQUES

Mining activities, especially new techniques used to mine gold, can be extremely destructive to the environment and pose serious threats to public health including contamination of groundwater and drinking water supplies. While not explicitly mandated as a "multiple use" of the forest, mining law authorizes and even encourages mineral development in the national forests. Unfortunately, many of the most remote and pristine areas of our forests are vulnerable to mineral development, including many inventoried roadless areas. (Organization, Charlottesville, VA - #A15659.90120)

RECREATIONAL MINING

There will no doubt be applications for so called "recreational mining." It too should be prohibited; recreational mining for gold or other precious metals with a dredge produces large amounts of dirt that destroys spawning beds for salmon and other fish. It also destroys habitat for the aquatic macro invertebrates on which fish feed. (Individual, Salem, OR - #A13948.90720)

1091. Public Concern: The Forest Service should not allow mineral exploration in certain areas.

IN THE TONGASS NATIONAL FOREST

I strongly oppose allowing oil drilling in Alaska's Tongass and other previously protected areas of our national forests. I understand that the benefits from drilling the known sources in this area would be minimal and short lived. (Individual, Danville, VA - #A1158.90720)

IN THE HUMBOLDT-TOIYABE NATIONAL FOREST

A ban on mineral exploration road building is essential if roadless areas on the Humboldt-Toiyabe National Forest in Nevada are to be protected. For example, between 1985 and 1997, approximately 350,000 acres of Forest Service roadless areas were lost, primarily to mining and exploration. This number is based on the following: Of the total area of areas identified in the Humboldt and Toiyabe Forest Plans in 1985, approximately 350,000 acres no longer qualified as roadless in the GIS inventory completed in support of forest plan revision in 1997. Based on local forest watch groups' experience, most of the land, except in the Schell Creek Range, was roaded by mining or exploration projects.

Currently, there are various exploration projects ongoing in roadless areas in Nevada. These include: Arc Dome south, the Toiyabe Crest, Bunker Hill, Georges Canyon, land directly adjacent to the Alta Toquima Wilderness, and Mahala Creek in the Independence Range. Because only a few percentage of these exploration activities lead to full-scale mining operations, the Forest Service should protect these roadless areas by requiring exploration without road building. Mining in the above mentioned areas should not be permitted. (Organization, Portland, OR - #A12004.90720)

IN THE SOUTHERN APPALACHIANS

Two recent examples from the Southern Appalachians illustrate the very real threat to roadless areas from mining activity and mining rights in the forest.

In Laurel Fork of the George Washington National Forest, a private oil and gas company was poised to exercise its lease rights in this magnificent and pristine roadless area. With a proposed pipeline along its borders and active leases beneath its surface, Laurel Fork was only spared by legal intervention and a negotiated settlement whereby the gas company agreed to relinquish its surface rights in Laurel Fork. The Forest Service has since amended its forest plan to preclude new oil and gas leases in the area.

The Devil's Fork Area of the Jefferson National Forest is another roadless area whose status is threatened by mining pressure. Due to private mineral rights in Devil's Fork, the Forest Service has

apparently removed Devil's Fork from the roadless area inventory. The area is clearly deserving of roadless status but for the existing mineral leases and rights associated with those leases. (Individual, Asheville, NC - #A22623.90720)

IN NORTH DAKOTA

With the overwhelming majority of the Little Missouri National Grasslands leased for oil and gas development I believe it is safe to conclude the Grasslands have been used in an exploitative manner. As mentioned earlier in North Dakota more than half of the roadless areas on the Little Missouri National Grasslands have disappeared in the last 30 years. In large measure this is the result of exploitative oil and gas development. Where we once had close to 450,000 acres of roadless areas, areas contain undeveloped oil and gas leases. Given this it is almost a forgone conclusion that oil and gas development will occur in many of these areas. Because of this leasing I believe the acreage of unroaded roadless areas may decline in North Dakota between this generation and the next more-so than many realized. I daresay few areas in the United States have born the brunt of declines as great as these.

In addition, new technologies, tax credits and development incentives serve to increase the extent of oil and gas development on the landscape, as well as the longevity and permanence of individual oil and well fields. The current administration is also forwarding policies that expedite oil and gas industry, such things harbor a downside in terms of landscape conservation. What might have once been on the landscape for 10 years or not at all, may now be there for 30 years or more. (Individual, Bismarck, ND - #A29119.65340)

IN THE GEORGE WASHINGTON AND JEFFERSON NATIONAL FORESTS

Two recent examples illustrate the very real threat to roadless areas from mining activity and mining rights in the forest. In the Laurel Fork Area of the George Washington National Forest, a private oil and gas company was poised to exercise its lease rights in this magnificent and pristine roadless area. With a proposed pipeline along its borders and active leases beneath its surface, Laurel Fork was only spared by legal intervention and a negotiated settlement whereby the gas company agreed to relinquish its surface rights in Laurel Fork. The Forest Service has since amended its forest plan to preclude new oil and gas leases in the area.

The Devil's Fork Area of the Jefferson National Forest is another roadless area whose status is threatened by mining pressure. Due to private mineral rights in Devil's Fork, the Forest Service has apparently removed Devil's Fork from the roadless area inventory. The area deserves roadless status but for the existing mineral leases and the rights associated with those leases. (Organization, Charlottesville, VA - #A25689.65340)

1092. Public Concern: The Forest Service should prohibit mining activities in roadless areas.

DUE TO THE ASBESTOS FIBERS CARRIED BY MINERS INTO HOMES AND TOWNS

The Seattle Post-Intelligencer has reported in a series of articles of the damage to human life by asbestos fibers carried by miners and the wind from tailings into northwest Montana homes and lives. This has been repeated where historic asbestos has been mined or, inadvertently, disturbed when other minerals were stripped from the earth (where associated with asbestos). You know these stories, this history and the terrible disease unleashed. (Individual, Mercer Island, WA - #A27540.65360)

1093. Public Concern: The Forest Service should revoke inactive mining claims.

Access to private lands in these areas - particularly mining claims that are nothing more than recreation cabins for snowmobiling, hunting, etc. should be disallowed and claims revoked. (Individual, Missoula, MT - #A6141.90110)

1094. Public Concern: The Forest Service should prohibit drilling in the National Forest System.

Please keep the national forest system as it is, do not open it up because of pressure from other groups or the government. Positively do not open it up to drilling of any kind. (Individual, Orwell, OH - #A11129.10150)

IN THE NEW YORK NATIONAL FINGERLAKES FOREST REGION

The Roadless Area Conservation Rule should be retained and implemented as is. The Bush administration needs to do all that it can to ensure protection of America's few remaining roadless areas. . . . Preparations should . . . stop for drilling (vertical or slant drilling) in the New York National Fingerlakes Forest region. (Individual, Rochester, NY - #A8831.10150)

1095. Public Concern: The Forest Service should oppose oil drilling in the Alaska National Arctic Wildlife Refuge.

We do have some other deep concerns.

Simply put they are:

That this roadless issue will be sacrificed to the passage of drilling in ANWR. We can only hope that you will make a supreme effort to not let this happen. (Association, Cody, WY- #A19163.16100)

BECAUSE IT WILL NOT PROVIDE LONG-TERM BENEFITS

I wish that you would not drill for oil in ANWAR in northern Alaska. Please. It won't do any good. Well, perhaps temporarily but not long term, and long term solutions are what you really should be seeking out and using. Think solar, waterpower, or windmills. (Individual, No Address - #A4548.65300)

I know out of doing a lot of research that drilling for oil in the Arctic is only going to give us a major disaster and you would not get enough to make a difference. (Individual, Spokane, WA - #A21843.50000)

I just don't see why Bush wants to ruin some of our precious wildlife reserve when we can get oil from other places or use more of an environmentally friendly form of energy. Please consider what I have said because if Bush allows this drilling to begin, then it is only a matter of time before it occurs in other places. I would like to be able to show my kids someday open green spaces with wildlife, not just cement streets and polluted air. (Individual, La Crosse, WI - #A1385.70300)

Grazing

Summary:

General Comments –Several individuals ask the Forest Service to address how grazing in roadless areas will be handled in the future, and to address the impact of roadless designations on rangeland health and management. One individual urges the Agency to insist that ranchers accept the risk that their herds will be subject to natural predators by not demanding that predators be destroyed or relocated. Another individual suggests that grazing rights should not automatically go to the same rancher every decade.

Funding – One individual suggests that the Forest Service should sell unneeded grazing land to people who hold leases.

Grazing – Some respondents urge the Forest Service to allow grazing in roadless areas. According to one individual private properties and communities could benefit by grazing on forest grounds to keep fuels from building up. Others suggest that the Roadless Area Conservation Rule should make it clear that grazing is a permissible use within these areas.

Respondents believe that the Forest Service should protect access to livestock and range facilities. One individual remarks that there needs to be access to livestock and associated activities such as delivering salt and water, mending fences and taking trailers to sick or injured stock.

A number of respondents state that grazing should be restricted. Several individuals request that the Forest Service prohibit grazing on all National Forest System lands. They believe it degrades the environment and has little fiscal pay off. Others say that it should be regulated in roadless areas, particularly in riparian areas and recreational campsites.

Grazing General

1096. Public Concern: The Forest Service should address how grazing in roadless areas will be handled in the future.

Other concerns related to this issue are the lack of information regarding the specifics regarding how grazing on current roadless areas will be handled in the future—will it be allowed; if not, how will it be prevented; if only reduced, by how much? (Individual, No Address - #A448.65120)

1097. Public Concern: The Forest Service should insist that ranchers accept the risk that their herds will be subject to natural predators.

BY NOT DEMANDING THAT PREDATORS BE DESTROYED OR RELOCATED

I think that if the government does lease out my forests to ranchers to graze their cattle on, there should be a clause in which they accept that because they are allowing their domesticated animals into the wilderness unsupervised, there will be consequences of their action. They will not demand that wolves, coyotes, cougars, bears, or any other natural predators that kill their livestock be terminated or relocated. They will accept these losses as part of the price for being allowed to graze their privately owned stock on public land. National Forests are meant to preserve our rare animals as well, and predators shouldn't be punished for doing what they were born to do. (Individual, San Diego, CA - #A4694.15160)

1098. Public Concern: The Forest Service should analyze the impact of roadless designations on rangeland health and management.

IN THE NATIONAL GRASSLANDS

The Forest Service should allow local and forest level decisionmaking for rangeland health in addition to forest health. This means that Roadless values should be analyzed as to their purpose and practicality as to range conditions on the national grasslands. It appears that many of the proposed Roadless areas on our national grasslands and national forests have been proposed without a thorough analysis of the impact on rangeland health and management. This analysis must include the impact of Roadless designations on adjacent private rangelands and their management. (Individual, Buffalo, WY - #A29885.60600)

1099. Public Concern: The Forest Service should ensure that grazing rights do not automatically go to the same rancher every decade.

If you want to make some changes, work on grazing rights. The fees for grazing rights should be competitive, and should NOT automatically go to the same rancher decade after decade. In many areas they should be curtailed, and eventually eliminated. (Individual, No Address - #A8932.65110)

Funding

1100. Public Concern: The Forest Service should sell unneeded grazing land.

TO PEOPLE WHO HOLD LEASES

Grazing land that is not needed should be sold to lease holders. So should forests if there are buyers. (Individual, Union City, MI - #A6855.30100)

Allow Grazing

1101. Public Concern: The Forest Service should allow grazing in roadless areas.

I would urge the Forest Service to keep under review the 58.5 million acres of roadless areas. My urging comes with a keen interest that current use of those roadless areas by ranching interests be considered a part of future use of roadless lands in National Forests. (Individual, Saint Ignatius, MT - #A7484.10110)

TO PREVENT FUELS FROM ACCUMULATING

Private properties and communities could benefit greatly by more grazing on forest grounds to keep fuels from building too heavily. (Individual, Ruby Valley, NV - #A15251.35000)

BY INCLUDING SPECIFIC STATEMENTS TO THAT EFFECT IN THE ROADLESS AREA CONSERVATION RULE

We note that in the Wilderness Acts, Congress specifically addressed grazing usage within the wilderness in order to clearly state that grazing was a permissible use within these areas. It stated that grazing was a permissible use within these areas. To avoid any confusion that grazing is a priority use within the roadless and unroaded areas, we suggest that similar statements be included in the proposed rule. (Elected Official, Roseburg, OR - #A11811.65110)

We note that in the Wilderness Acts, Congress specifically addressed grazing usage within the wilderness in order to clearly state that grazing was a permissible use within these areas. To avoid any confusion that grazing is a priority use within the roadless and unroaded areas, we suggest that similar statements be included in the proposed rules. (County Attorney, Grant County, OR - #A17667.90610)

IN NORTH DAKOTA

The Final EIS indicates in the response to comments volume (Volume 3), that local managers will have the option to disallow grazing and other uses in inventoried roadless and unroaded areas if deemed necessary to protect their roadless characteristics. Based on this, it is erroneous to assume that grazing will not be affected by the roadless designation.

This plan does not recognize the fact that North Dakota's National Grasslands consist of intermingled private, state and federal land. Seriously curtailing grazing on the federal portion of this system will put more pressure on the private lands. The result will be a negative impact on an ecosystem we have worked on improving for 70 years. (Elected Official, Watford City, ND - #A27737.65100)

1102. Public Concern: The Forest Service should protect access to livestock and range facilities.

We need **ACCESS TO LIVESTOCK AND RANGE FACILITIES**. Ranchers need roads and trails to move camps, to mend fences on grazing permits, to deliver salt and water to animals, and to get trailers in to sick or injured stock. (Individual, West Point, UT - #A5415.90610)

Fencing around the units in the Manti Canyon is very critical. Fences keep the cattle in the units that they are allowed to graze in. Without fences, the cattle would be scattered all over the mountainside. The different fences surrounding the units consist of electric, barbed wire and log. With harsh winters and other elements, the fences need to be fixed every year before and during the grazing period. Roads are critical for access to get to the fence lines. It would be impossible to carry all the equipment, fencing

tools and other supplies by horse or foot. The use of vehicles and ATVs reduces the hours spent on fixing the fences and it also makes the work easier. Along with fencing, proper nutrition is needed for the cattle.

Salt is needed for proper healthy nutrition for the cattle. The salt also gives the cattle bloat protection. Salt is only able to be packed by horses when the amounts are small and it's a short distance to travel. Because the salt bags weigh 50 to 100 pounds each it is more economical and [less] time consuming to haul salt with a motorized vehicle. We wouldn't be able to provide the proper nutrition to those animals very economically with the roads closed. The salt licks are also used by the deer, elk, and even smaller animals. They are provided good nutrition from the salt licks. (Individual, Manti, UT - #A20336.90100)

Do Not Allow/Restrict Grazing

1103. Public Concern: The Forest Service should regulate grazing in roadless areas.

Grazing, I feel at times needs to be more regulated than it is, because I have seen areas of the forest which I felt were terribly overgrazed, even in wetter years. (Individual, Powell, WY - #A19223.65110)

IN RIPARIAN AREAS AND RECREATIONAL CAMPSITES

Cattle should not have any access to riparian zones, and, should be excluded from using recreational campsites. Preferably, all foraging in roadless areas would be reserved for only wildlife and big game species. (Individual, Geneva, NE - #A15512.90110)

1104. Public Concern: The Forest Service should not allow grazing on National Forest System lands.

Grazing should be banned. (Individual, Chico, CA - #A1040.90000)

BECAUSE OF ENVIRONMENTAL DAMAGE

Keep cattle out of the areas in the Western states, because they are nothing but hoofed locusts. They eat all of the best forage and leave very little nutritious forage for wildlife, plus they destroy the streams. (Individual, Ogden, UT - #A1166.90000)

I am opposed to allowing livestock to graze on national forest or other federally owned lands. The programs degrade the environment and do not generate enough money to pay for them. (Individual, Waco, TX - #A3956.90620)

1105. Public Concern: The Forest Service should restrict off-road vehicle use by ranchers on National Forest System lands.

FOR THE PURPOSE OF MONITORING LIVESTOCK

What about the cattleman? Most of them nowadays ride ATVs to keep track of their cows to monitor where the cows are. Will they be forced to ride ATVs in the woods? Like most dirt bikes have torn up our trails that are slowly being closed to the public? (Individual, Forest Ranch, CA - #A5944.65140)

Utility Corridors

Summary

General Comments – One individual requests that the Forest Service consult with the Federal Energy Regulatory Commission and the Federal Communications Commission regarding the effects of the proposed regulation on public utilities that have rights-of-way (ROWs) which cross the National Forest System, or which may need to cross the NFS in the future. This person believes these corridors should be counted as existing roads.

Utilities – Those who assert that utility development should be allowed to continue write primarily about the need to maintain access to utilities. One individual believes that the Forest Service should allow power line construction in roadless areas. Several utility groups assert specifically that the Forest Service should allow them to have continued access to their facilities. To that end, individuals and city agencies ask the Forest Service to maintain existing roads in order to allow local governments access to their water systems.

Other respondents request that the Forest Service restrict or prohibit utility development in roadless areas. They suggest that the Agency prohibit power-lines and pipelines, wireless telecommunications facilities, and hydroelectric facilities; prohibit maintenance of existing dams; prohibit water extraction; and limit water withdrawal that threatens to lower the water table.

Utilities General

1106. Public Concern: The Forest Service should consult with the Federal Energy Regulatory Commission and the Federal Communications Commission regarding the effects of proposed regulation on public utilities.

TO ENSURE ACKNOWLEDGEMENT OF EXISTING RIGHTS-OF-WAY

The Federal Energy Regulatory Commission (FERC), and the Federal Communications Commission (FCC), must be consulted regarding the effect of the proposed regulation on Public Utilities that have rights-of-way (ROWs) which cross the National Forest System, or which may need to cross the NFS in the future.

All utility rights-of-way, and proposed rights-of-way, must be acknowledged to be existing roads. These ROWs are vital to rural economies. The USDA has a mandate to improve rural economies, and this mandate applies to the USDA Forest Service as well. (Individual, Anchorage, AK - #A11831.91710)

Allow Utilities

1107. Public Concern: The Forest Service should allow power line construction in roadless areas.

I don't think an occasional power line or other man made structure decreases my outdoor experience. (Individual, Palmer Lake, CO - #A23361.90100)

1108. Public Concern: The Forest Service should allow access to power lines and hydroelectric facilities.

THROUGH THE CONSTRUCTION OF TEMPORARY ROADS

Roadless area rules must allow for access to facilities within the forest that may not presently have defined roads, but for which periodic repair work may require the temporary establishment of an access road. For example, SCE owns numerous power lines that traverse forest lands and many hydroelectric facilities are located on forest property. These facilities may not require permanent roads. However, occasional access may necessitate the creation of a temporary road or pathway. (Organization, Rosemead, CA - #A22624.91110)

FACILITIES CONTROLLED BY THE TENNESSEE VALLEY AUTHORITY

The Tennessee Valley Authority has a significant number of electric transmission lines already erected on Forest Service lands in a number of National Forests in seven states that TVA serves. In order to maintain the easements, perform emergency repair and routine maintenance TVA needs to be able to

utilize existing access roads or as some roads are reclaimed by the Forest Service, extend limited lengths of new roads through the edge of some areas being considered for "Roadless Area" designation.

It would be in the Forest Service's local management interest and TVA's interest to be able to work together to meet the objectives and needs at the local forest level, yet preclude general public access and utilization of any road access agreed to by the two agencies. TVA has been working with the local forest managers to close some roads and to a limited extent assist in maintenance of others. In the mountainous, rolling, or wetlands of some of the forests there is no other way to maintain access to existing lines and structures. Failure to maintain the structures or lines would result in significant portions of the service area being uncertain of reliable power and jeopardize several interconnections on the national power grid. (Organization, Chattanooga, TN - #A3339.91710)

1109. Public Concern: The Forest Service should maintain existing roads.

TO ALLOW LOCAL GOVERNMENTS ACCESS TO THEIR WATER SYSTEMS

Roads are also necessary to repair and maintain city water supplies. (Individual, Fountain Green, UT - #A20620.51000)

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 depend on it. (Individual, Manti, UT - #A29868.51000)

If a road were washed out on public lands, local governments would have unnecessary costs and red tape to follow to get a road repaired to access their water system. (Individual, Manti, UT - #A25532.91710)

RAYWOOD FLAT AREA

The Raywood Flat and the Banning Canyon roads in the counties of Riverside and San Bernardino, California, are used to access and service an approximately 14 mile long water conveyance system that provides water to residents of Banning Bench and the City and also provides the hydro power for the Southern California Edison ("SCE") San Gorgonio #1 and #2 hydroelectric project. The system includes two diversion dams, two powerhouses, water tanks, and a long water flume conveyance system. Historical records indicate that the original flume was constructed of wood around 1877 to provide water to the early settlers in the region, and that the current concrete flume was constructed around 1910 to provide water and generate hydroelectric power. The system is referred to by the Federal Energy Regulatory Commission (FERC) as "Project 344," and SCE holds a FERC license to operate it for power generation.

Some 75 years ago, the State of California adjudicated the right of the Banning Heights Mutual Water Company ("BHMWC") and the City to divert and use the water that generates power for Project 344. The adjudicated right to divert water that BHMWC and the City hold to is very significant indeed: approximately 9,500 acre/feet per year from the whitewater River. Banning Bench, a community of some 600 residents served by BHMWC, has been almost entirely dependent on this water supply for nearly a century. Use of this water by the residents of the City (pop. 26,000) goes back at least that far. Moreover, for more than a century, the City, SCE, and BHMWC have used the roads in this area to operate, maintain and repair the flume system.

Designating Raywood Flat Area A and Area B as a Roadless Area, would seriously endanger BHMWC's and the City's water supply by not allowing for the road maintenance and repairs that are periodically needed in order to enable BHMWC, the City, and SCE to have access to Project 344. Including these areas in the Roadless Area designation would only lead to inevitable problems, as the Forest Service will most likely maintain that special permission is thereafter required to repair and maintain the existing roads, and the City will out of necessity, respond by asserting its various rights to this essential right-of-way as were granted by 19th Century Federal Law. The upshot will be costly and potentially cause long delays for essential repairs to the diversion dams and water conveyance system that our community depends on. (Manager, City of Banning, CA - #A20958.51210)

The Raywood Flat Road and Banning Canyon Road are shown on existing Forestry maps to be partially excluded from the proposed Roadless Area, but this is not enough. All of the roads along with the entire water conveyance system need to be excluded from the Roadless Area, starting from the Banning Heights Water Tank at Pine Powerhouse all the way up to the Diversion Dam at the East Fork of the Whitewater River. The best approach is simply not to include in the Roadless Area any of the Sections of land that contain any roads or improvements on them or provide access to portions of the water conveyance system.

Once put in place, it will be hard to work around a Roadless Area or to change that designation. Areas must not be made roadless where existing roads in those areas are regularly used to operate, maintain, and repair a water system that has been relied upon by our community for nearly a century. Ours is a growing city, and the importance of this water source for our community is only going to increase as that growth occurs. (Manager, City of Banning, CA - #A20958.45610)

This letter is sent to you to address the matter of the proposed Roadless designation in the Raywood Flat Area AandB (#61 and #62). The Raywood Flat Rd. and the Banning Canyon Rd. in Riverside and San Bernardino County California, helps service a hydroelectric project with 2 diversion dams, 2 power houses, water tanks, and long water conveyance system which provides water to Banning Heights Mutual Water Co. for the Banning Bench, a small community of approximately 500 residents.

Banning Heights and its predecessors have owned the water rights that serve as the basis for the Federal Energy Regulatory Commission (FERC) project for more than 80 years. The Banning Bench has been primarily dependent on this supply for their water. The hydro project has used the existing forestry roads in this area to maintain the entire system for at least 80 years. (Individual, Banning, CA - #A17655.91610)

1110. Public Concern: The Forest Service should allow motorized vehicles in roadless areas.

TO MAINTAIN WATER SYSTEM STRUCTURES

In other areas of national forests we are aware of many situations where access has been denied to municipalities and irrigation companies to maintain water system structures in wilderness and roadless areas even though water permits and roads were established long ago. These systems cannot be maintained without the use of motorized equipment and road access. (Professional Society, No Address - #A27584.65000)

Do Not Allow/Restrict Utilities

1111. Public Concern: The Forest Service should prohibit power-lines and pipelines in roadless areas.

I guess roads are something that ought to be prohibited if we're going to call an area roadless. I'm not sure how far I'd go beyond that - perhaps I'd include power-lines and pipelines as prohibited—large, linear structures that have a function similar to roads (and often require roads for construction and servicing anyway). (Individual, Jackson, WY - #A10527.90110)

1112. Public Concern: The Forest Service should prohibit the construction of wireless telecommunications facilities.

The following activities should be expressly prohibited in existing roadless areas: logging (except where scientific evidence proves that it is essential to the health of the forest), mineral extraction, construction of power lines, and the construction of wireless telecommunications facilities. (Organization, Washington D.C. - #A22098.90110)

1113. Public Concern: The Forest Service should prohibit hydroelectric facilities in roadless areas.

Activities that should be prohibited include: construction roads, snowmobiles, operating personal watercraft (jet skis) and off-highway vehicles, harvesting timber commercially, mining, exploring for oil and gas, and developing hydroelectric facilities. (Individual, Eureka, MT - #A10594.90110)

1114. Public Concern: The Forest Service should not allow maintenance of existing dams.

There should be overarching federal guidelines that apply to all roadless areas, including . . . no maintenance of existing dams. (Individual, Dutch John, UT - #A25600.13130)

1115. Public Concern: The Forest Service should prohibit water extraction from roadless areas.

Water extraction from roadless areas should be prohibited. Water extraction from aquifers underlying roadless areas should be strictly limited. Use only the natural outflows from roadless areas. (Individual, Durham, NH - #A8746.90110)

1116. Public Concern: The Forest Service should limit water withdrawal that threatens to lower the water table.

. . . limit water withdrawals that threaten to lower the water table . . . . (Individual, Cleveland, OH - #A26411.90000)

Other Natural Resource Concerns

Summary

Respondents offer various comments relating to management of natural resources which do not fall under the topics covered in the above sections. A few individuals ask the Forest Service to recognize the possible medicinal values available in forest products, while an agriculture association suggests that the Agency should recognize that the most effective use of grasslands is food production. Others suggest that certain activities be prohibited in roadless areas, including construction of commercial facilities, dumping of waste materials, nuclear testing and waste storage, and eco-terrorism.

1117. Public Concern: The Forest Service should recognize the possible medicinal values available in forest products.

Today, medicine has discovered that some of the best cures come from nature. Where will we be without cures for illnesses if our resources for curing them are gone? (Individual, Columbus, OH - #A4376.65290)

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)

1118. Public Concern: The Forest Service should revise the leasing process.

TO ALLOW MORE EQUITABLE EXPENSE SHARING

The entire leasing process must be revised to allow more equitable expense sharing between private industry and US citizens. The USFS was not established as a welfare assistance program. (Individual, Kemmerer, WY - #A8383.17130)

1119. Public Concern: The Forest Service should prohibit various activities in roadless areas.

CONSTRUCTION OF COMMERCIAL FACILITIES

The following activities should be completely prohibited in roadless areas: . . . construction of commercial facilities such as lodges, ski resorts, guide stations, hotels, radio and television towers as well as cellular telephone broadcast facilities . . . . (Individual, Port Angeles, WA - #A6179.90110)

DUMPING OF WASTE MATERIALS

Dumping of waste other than natural waste should be prohibited. (Individual, Lacey, WA - #A17762.90000)

I think pollution and anti-dumping laws of public lands should be strengthened and enforced. IRAs should above all else be clean. (Individual, Palmer Lake, CO - #A23361.90000)

NUCLEAR TESTING, POWER GENERATION, AND ECO-TERRORISM

Nuclear testing and power generation should not be done in IRAs.

Eco-terrorism should not be tolerated in IRAs. (Individual, Palmer Lake, CO - #A23361.90110)

NUCLEAR WASTE STORAGE

Activities prohibited: Nuclear waste storage. (Individual, No Address - #A28602.90110)

1120. Public Concern: The Forest Service should recognize that the most effective use of grasslands is food production.

As we view this plan, the most effective usage of the grasslands is food production. (Association, Watford City, ND - #A29131.65000)

Recreation General

Summary

General Comments – People offer a number of general comments regarding recreation management. Some respondents assert that the Forest Service should take its responsibility to provide recreation opportunities to the public more seriously. One Permit Holder states that, per the National Forest Management Act, the Agency has a statutory duty to provide outdoor recreation opportunities. Others assert that the Agency's goal must be to provide the maximum amount of recreational opportunities, as long as they do not cause significant, irreversible harm to the environment. To that end, people urge the Forest Service to devote more attention to recreation planning and, in so doing, to consider various recreational values—such as non-wilderness, semi-primitive, motorized, and non-motorized values, and the value of dispersed recreation.

Some ask the Forest Service to allow management activities designed to reduce fuel loading and wildfire risk because of the impacts of fire on recreational opportunities. Others urge the Agency to forego implementation of the Roadless Area Conservation Rule because, they say, it does not adequately consider recreation, or because it will be overly restrictive toward recreation uses. Likewise, one Organization urges the Forest Service to manage for multiple use in order to promote recreational diversity. Another suggests that the Agency prepare a winter recreation use plan as part of the forest planning process in order to develop a system of land use allocations.

Respondents also comment on recreation management vis-à-vis wilderness management, particularly in relation to dispersed recreation. According to some, the Forest Service should manage roadless areas to reduce recreation pressures on designated wilderness areas—by providing non-motorized recreational opportunities, or by allowing a wider variety of activities, including motorized activities. On a similar note, some advocate opening non-wilderness areas, including roadless areas, to dispersed recreation.

Adequacy of Analysis – A few individuals suggest that the Forest Service should acquire data on the increasing recreational use of National Forest System lands and that it should, likewise, evaluate recreation potential in roadless areas. One individual adds that such evaluations must utilize accurate maps indicating cultural improvements, as well as topographic features on a small drainage-by-drainage basis. A business asks the Agency to evaluate seasonal suitability for various activities, including motorized and non-motorized recreation.

Funding – Some urge the Forest Service to request adequate funding for recreational programs, in particular so that these facilities can be maintained without visitor fees. Others suggest that money allocated for roads or for timber sales be used instead to fund recreational facilities.

Recreation Access – A number of respondents assert that the Forest Service should not restrict recreation access to National Forest System lands. Some say specifically that the Agency should ensure no net loss to public land and public access—that for every acre marked as 'Closed,' an equal acre be marked as 'Open Access.' Likewise, one Organization urges the Forest Service to ensure equal access among different user groups.

Some suggest that access be allotted according to use demands. For example, several propose allocating land acreage proportionally based on numbers of users for each activity. Others suggest granting proportional access among user groups based on their respective needs for

solitude; this would mean allocating more land area for non-motorized users, suggest some individuals. Finally, one individual requests that the Forest Service take into consideration the available opportunities for activities on other public lands when making allocation decisions.

Other respondents, however, maintain that there is currently sufficient access and that implementation of the Roadless Area Conservation Rule would have no effect on access. These comments appear in the previous section on travel management.

User Conflicts – The topic of user conflicts arises occasionally in comments directed to recreation management. Some respondents suggest that the Forest Service can alleviate the crowding that leads to conflicts by making more land available for recreation. Another individual asserts that crowding can be alleviated by implementing the Roadless Area Conservation Rule. This person remarks that these areas are already over-crowded by so many different users, and would appreciate the prohibition of a few uses, such as motorized vehicles.

Others believe the Forest Service can alleviate conflicts by designating separate areas for competing uses—such as for motorized and non-motorized uses, or for different types of motorized uses. Another individual suggests allowing activities according to the landscape's ability to tolerate them, and then prioritizing uses according to the percentage of the public that participates in that activity.

Recreation Management General

1121. Public Concern: The Forest Service should take a leadership position in managing National Forest System lands.

BECAUSE IT HAS A STATUTORY DUTY TO PROVIDE OUTDOOR RECREATION OPPORTUNITIES TO THE PUBLIC UNDER THE NATIONAL FOREST MANAGEMENT ACT

The agency needs to take a leadership position in managing the forests. The Forest Service has tremendous expertise in managing natural resources, and it has a duty to apply that expertise. In the past couple years, the agency has explored various roles for itself in forest management, including those of "convenor" or "facilitator." From the ski industry's perspective, it is crucial that the Forest Service take a leadership role in decision-making on the management of the forests, whether it be at a planning or site-specific project level. The agency is not merely a participant in the process, it has a statutory duty to provide outdoor recreation opportunities to the public under NFMA [National Forest Management Act], the Multiple-Use Sustained Yield Act, and the National Forest Ski Area Permit Act. We appreciate the difficult position that the agency is in and the fact that the results of its decision-making are not always popular. As we witness a tremendous increase in involvement from other agencies with little or no recreation experience in approval processes, however, the leadership of the Forest Service becomes paramount. (Permit Holder, No Address - #A5285.12120)

1122. Public Concern: The Forest Service should acknowledge that its goal is to provide the maximum amount of recreational opportunities.

AS LONG AS THEY DO NOT CAUSE SIGNIFICANT, IRREVERSIBLE HARM

Make it plain from the start that the goal of the Forest Service is to provide the maximum amount of recreational opportunities as long as they do not cause SIGNIFICANT IRREVERSIBLE HARM. Baseless emotional arguments will not be considered. An example being that it is often stated that deer, elk, and bears shy away from roads and need pristine wilderness to survive. Now we know that this is a baseless argument because too many deer, elk, and bears have ended up in unlucky motorists' grilles, and the highest concentrations of these animals are not in the pristine wilderness areas, but instead in the bottoms near the roads. (Individual, Kalispell, MT - #A19138.15160)

1123. Public Concern: The Forest Service should consider various recreational values.

NON-WILDERNESS, SEMI-PRIMITIVE, MOTORIZED, AND NON-MOTORIZED

Non-wilderness, semi-primitive, motorized and non-motorized recreation values must be considered as important from an economic and social standpoint. Semi-primitive both motorized and non-motorized recreation adherents are typically non-communicative and seldom heard from. They do, however, represent a large percentage of forest users, thus should be provided for. (Individual, Manhattan, MT - #A21848.45100)

THE VALUE OF DISPERSED RECREATION

I find value in all of the roadless areas characteristics but what truly sets inventoried roadless areas apart from other specially managed lands is the opportunity for dispersed recreation. For me, this means an opportunity to enjoy the great outdoors with family and friends. Our roadless areas must be managed to preserve and promote dispersed recreation opportunities. (Individual, Lawrenceville, GA - #A6172.45100)

I find value in all of the roadless areas characteristics but what truly sets inventoried roadless areas apart from other specially means an opportunity to enjoy the great outdoors with family and friends. Our roadless areas must be managed to preserve and promote dispersed recreation opportunities. (Individual, Stinson Beach, CA - #A28654.45100)

1124. Public Concern: The Forest Service should devote more attention to recreation planning.

ESPECIALLY IN THE TONGASS NATIONAL FOREST

I believe that the Forest service needs to devote much more attention to recreation planning, especially in the Tongass. In the future we face a great danger of loving our forests (and associated waters) to death, and losing wilderness. This problem will require difficult policy decisions such as capacity analyses, allocations between private and commercially operated recreation visits, design and location of infrastructure, and prevention of ‘theme parks’ that diminish and obscure the lessons of naturally functioning ecosystems. (Individual, Sitka, AK - #A15506.90000)

1125. Public Concern: The Forest Service should manage roadless areas for primitive recreation.

We need wilderness as places of solitude in an over-crowded world. Only government can provide this unusual “service” by setting aside a relatively small portion of the public domain for “primitive” recreation. (Individual, Harrison Township, MI - #A8378.25300)

1126. Public Concern: The Forest Service should manage to reduce fuel loading and wildfire risk.

BECAUSE OF ITS DEVASTATING IMPACTS ON RECREATIONAL OPPORTUNITIES

Allow vegetative management activities that are designed to reduce fuel loading and wildfire intensities.

Catastrophic wildfires can have significant environmental consequences as well as devastating effects on recreational opportunities. With this in mind, it is important that the agencies be encouraged and allowed to treat fuels to reduce the risk of wildfire within these designated areas. (Organization, Salt Lake City, UT - #A12009.30500)

1127. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.

BECAUSE IT DOES NOT ADEQUATELY CONSIDER RECREATION

Please accept my comments on the roadless initiative as proposed by the Clinton Administration. I object to just about all aspects of the initiative as presented as is currently being considered for implementation. The issue was railroaded through the public comment process, our comments were discouraged, belittled or ignored. The inventory of roadless areas includes many areas that include roads and ORV [Off Road Vehicle] trails, yet are inventoried as "roadless." The whole plan is nothing more than an attempt to lock up more public land. If it truly was an attempt to better manage the public land, serious consideration would have been given to recreation that includes ORVs and mountain bikes. These forms of recreation would have been addressed not just mentioned. (Individual, Everett, WA - #A744.12220)

BECAUSE IT WILL BE OVERLY RESTRICTIVE TOWARD RECREATION USES

I am writing to support the decision the Forest Service's Roadless Area Conservation Rule. The roadless initiative put forth by the Clinton administration is overly restrictive toward recreation uses and doesn't represent the interests of the people who actually go to the National Forests. (Individual, Fort Collins, CO - #A970.10130)

Please STOP the Forest Service's Roadless Area Conservation Rule as published in the Federal Register on January 12, 2001. Allowing the Roadless Area Conservation Rule to stand would cause irreparable harm to the millions of people who depend on our forests for resources and recreation. (Individual, Albuquerque, NM - #A10497.10130)

As an ORV person, I'm 180 [degrees] away from the citizen who wants Forest land totally closed to humans. I think that's unrealistic and unfair.

I think there's enough land to go around for all users, or non-users, to use and enjoy. Whether it's ORV parks (snow mobiles included), hiking trails, whatever, the users (sometimes in organized clubs) are currently responsible for the area's upkeep. Let's keep it that way. (Individual, Asheville, NC - #A15196.10130)

1128. Public Concern: The Forest Service should manage roadless areas to reduce recreation pressures on designated wilderness areas.

BY PROVIDING NON-MOTORIZED RECREATIONAL OPPORTUNITIES

As a wilderness manager, I know that the designated wilderness areas are being "loved to death." Though the surveys all show that roughly 85 percent of those who come to public lands are seeking peaceful (non-motorized) contact with nature related outdoor recreation experiences, they too often find that the 75 percent of the public land which is not protected as wilderness is invaded by the ugly technological externalities of noise, speed, fumes, roads, dust . . . etc. The small percentage who wish to use public lands for motorized recreation are increasingly dominating the non-wilderness portions of America's public lands, rendering them useless as sanctuaries for the many citizens who desperately need a vacation away from city noises. The result is that far too many citizens must seek peace and solitude in designated wilderness! This should not be! (Individual, Murphys, CA - #A15706.25350)

BY PROVIDING FOR A WIDER VARIETY OF ACTIVITIES, INCLUDING MOTORIZED

Managing roadless units as roadless can be an exciting challenge, providing a tremendous variety of opportunities not available in wilderness. You can harden sites to accommodate uses. You can prescribe fire for hazard reduction or wildlife habitat improvement. You can build trails specifically designated to accommodate a variety of uses, from 4-wheelers to rock climbers. You can provide permanent improvement such as corrals or hitch racks for pack and saddle stock. You can spray herbicides for weed control or insecticides for control of insect outbreaks. Creative management of roadless lands can reduce

recreation pressures on our true wilderness units by providing attractive alternatives. The possibilities are limitless. (Organization, No Address - #A8227.25360)

1129. Public Concern: The Forest Service should manage for multiple use.

TO PROMOTE RECREATIONAL DIVERSITY

Multiple-use management goals are the only goals that will "best meet the needs" of the public and provide for equal program delivery to all citizens including motorized visitors. All of us have a responsibility to accept and promote diversity of recreation on our public lands. Diversity of recreation opportunities can only be accomplished through management for multiple-uses and reasonable coexistence among visitors. (Organization, Helena, MT - #A20619.50200)

1130. Public Concern: The Forest Service should open non-wilderness areas to dispersed recreation.

Some of our public land should be managed as Wilderness, but certainly not all of our roadless areas. Areas not yet designated by Congress, should be open to dispersed recreation, including significant portions for motorized recreation. Roadless area conservation will protect the same characteristics that make these areas special and worthy of Wilderness consideration but it will do so without eliminating access. (Individual, Canyon Lake, TX - #A3666.25220)

INCLUDING ROADLESS AREAS

I find value in all of the roadless areas characteristics but what truly sets inventoried roadless areas apart from other specially managed lands is the opportunity for dispersed recreation. For me, this means an opportunity to enjoy the great outdoors with family and friends. Our roadless areas must be managed to preserve and promote dispersed recreation opportunities. The demand for motorized and other dispersed recreation is growing. At the same time, the supply of roadless lands available for multiple-use activities continues to decline because of special designation and development. Clearly, there is a need for lands managed as roadless to provide dispersed recreation opportunities. (Individual, Victoria, KS - #A2874.91110)

I am pleased that the Roadless Area Conservation Rule recognizes the special values associated with roadless areas for both motorized and non-motorized recreationists. I agree with the Forest Service that dispersed recreation opportunities are among the characteristics of roadless areas and that they should be protected for future generations; and I am opposed to any action that might weaken this protection. (Individual, Canyon Lake, TX - #A3666.91110)

1131. Public Concern: The Forest Service should encourage recreational development of private lands.

TO ENHANCE RECREATION OPPORTUNITIES ON PUBLIC LANDS

They should have a reasonable right to access their lands and they should be able to manage their lands as necessary. In some cases, development of private land may serve to enhance the recreation experiences on the public lands. The agencies should be encouraged to work collaboratively with private landowners in the planning for these designated areas. (Organization, Salt Lake City, UT - #A12009.40000)

1132. Public Concern: The Forest Service should emulate the Ten Lakes Roadless Area management.

The Ten Lakes Roadless Area (designation in S-393) is an example of roadless management to be emulated. Snowmobiling is prevalent with no effect on soil and water. Cross-country skiing is permitted. With hardened trails and minimal shelters it could become a unique use recreation area. (Association, Eureka, MT - #A17718.91110)

1133. Public Concern: The Forest Service should prepare a Winter Recreation Use Plan as part of the forest planning process.

TO DEVELOP A SYSTEM OF LAND USE ALLOCATIONS

We have a suggestion to help the Forest Service shape the future of managing roadless areas and alleviating some of the tension that is occurring between various winter recreation activists such as snow cat skiing, snowmobiling and backcountry skiing. This is that the Forest Service prepare a Winter Recreation Use Plan as part of the forest planning process. The primary approach for this plan should be a system of land allocation whereby areas are established and managed for each of these uses. That is, separate areas for motorized and non-motorized users, snow cat skiing and snowmobiling etc. The roadless area protection presents an opportunity to do this as some roadless areas have low value for Wilderness designation and could be set aside for these other uses. (Permit Holder, McCall, ID - #A15317.91210)

Adequacy of Analysis

1134. Public Concern: The Forest Service should acquire data on the increasing recreational use of National Forest System lands.

The Forest Service must have data on the increasing recreational use of the lands it manages. The demand for recreational lands is virtually exploding. In the Chattahoochee National Forest, cars are parked at trailheads every day of the year. On weekends, it's hard to find a parking space. On the Nantahala River in North Carolina, every pull-out along the river has one or two cars parked in it. Even the western national forests are seeing increased use. I have visited and hiked and fished in several western national forests, and I always see people, even in the most remote areas. These data on recreational use should be used and considered in all Forest Service decision-making processes. (Individual, Conyers, GA - #A13536.90000)

1135. Public Concern: The Forest Service should evaluate recreation potential in roadless areas.

BY USING ACCURATE MAPS

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, Evergreen, CO - #A19178.90000)

1136. Public Concern: The Forest Service should provide an evaluation of seasonal suitability for various activities.

INCLUDING MOTORIZED AND NON-MOTORIZED RECREATION

This list might include: An evaluation of seasonal suitability for various activities, including motorized and non-motorized recreation. (Business, Lewiston, ID - #A7991.90000)

Funding

1137. Public Concern: The Forest Service should request adequate funding for recreational programs.

Please ask for funds to adequately support the Forest Service recreation and trail programs. For many years the Forest Service has said they support recreation but they have NOT asked for the appropriated monies to do so. "ON the ground monies" have decreased for the last 3 years, while money for various plans have increased! Please ASK for more money for field level staff and projects. (Individual, Los Altos, CA - #A27264.17100)

IN ORDER TO MAINTAIN RECREATIONAL FACILITIES WITHOUT VISITOR FEES

I also urge your support for increasing the Forest Service recreation budgets, and to maintain our National Forests and campgrounds without visitor fees. (Elected Official, Salem, OR - #A23671.90000)

1138. Public Concern: The Forest Service should use money allocated for roads to fund recreational facilities.

By keeping the current roadless rule, it is also my hope that this will make more funds available nationally to improve hiking trails and to maintain existing roads on forest lands for the motorized public. The lack of funds to maintain the existing infrastructure on public lands has reached a crisis point. In our area, the Forest Service is unable to keep up with the needs of the recreating public. Campgrounds are full, parking lots are inadequate at trailheads, and trails and roads are not being maintained. In my opinion, recreation has become the national agenda for the Forest Service, not building roads that subsidize the logging industry. (Elected Official, Hailey, ID - #A4888.91110)

1139. Public Concern: The Forest Service should use funds from timber sales to build new recreational facilities.

I suggest that timber sales be used to generate the funds to build new campgrounds and new access roads to trailheads or picnic areas.

If more such trailheads were created, it would help disperse the crowds. The forest service needs to be partnering with the lumber industry to expand the recreation opportunities. (Individual, Bozeman, MT - #A59.17130)

Recreation Access

1140. Public Concern: The Forest Service should not restrict recreation access to National Forest System lands.

As the USFS evaluates roadless areas it should consider the public's right to access and recreate on public land . . . if the and is lock up then some jobs will be lost in policing/maintenance/upkeep and new road building, just to name a few. (Individual, Ogden, UT - #A590.90110)

The public should have access to public lands. Access to public lands should be guaranteed. (Individual, No Address - #A931.91110)

There are too few areas where people can camp, hike, fish, hunt, or just get away from other people and enjoy solitude. We need more access to wilderness areas where reservations are not required months in advance, or by permit only. It is getting to the point now where you can achieve the same outdoor experience in your suburban backyard, as you can in the public parks and campgrounds. (Individual, Renton, WA - #A3967.91110)

BY ENSURING NO NET LOSS TO PUBLIC LAND AND PUBLIC ACCESS

I'm seriously opposed to removing millions of areas of land from public use by randomly calling a road a "non-road" and refusing to maintain or clear perfectly good roads and these other bogus political moves.

We need NO NET LOSS to public land. No NET LOSS to access! If anything, there should be an INCREASE in public land and access to provide quality experiences to a growing population. (Individual, Cincinnati, OH - #A4027.90100)

I strongly ask that a full revision of the rule and ask that for every acre marked as 'Closed,' an equal acre be marked as 'Open Access.' (Individual, Healdsburg, CA - #A6217.10120)

1141. Public Concern: The Forest Service should allow access to roadless areas by local citizens.

AS THE ONLY EXCEPTION TO ACCESS RESTRICTIONS

The ONLY exemption [to restrictions on access to roadless areas] that I believe could be considered would be to provide LIMITED access if local populations were not able to otherwise enjoy their own wilderness areas. This access should strictly forbid any possibility of allowing any vehicles off the access area into the wilderness . . . not just snowmobiles and all wheel terrain vehicles. I do believe citizens in local areas should have the ability to enjoy their wilderness . . . but it MUST remain a wilderness . . . for them and their children's enjoyment, for the health of the environment, and for the life of the animals that live there. (Individual, College Park, MD - #A4380.90100)

1142. Public Concern: The Forest Service should ensure equal access among different user groups.

Management of our National Forest to maximize wild game populations at the expense of other uses does not meet the requirements of multiple-use laws and policies. We support hunting but why is hunting's impact on wildlife acceptable and non-destructive viewing by motorized visitors not acceptable? We are concerned that the areas of the National Forest which were designated for multiple-use management are not being managed for multiple-use. The document should carefully evaluate if the objectives of multiple-use laws and policies are being met by the proposed action. National Forest management decisions must not tend to eliminate access and recreation opportunity for one class of forest visitor and favor access and opportunity for another class of forest visitor. Past travel plan and rulemaking actions have effectively done this. The goal of public land management must be to require sharing of our resources with all users and uses. The document must evaluate the cumulative effects of travel plan and other forest actions on multiple-use and motorized visitors. (Organization, Helena, MT - #A13226.50200)

1143. Public Concern: The Forest Service should allocate land acreage proportionally based on numbers of users for each activity.

We have wilderness areas. We have roadless areas. We have remotely roaded areas. We have moderately roaded areas. We have heavily roaded areas. We have a variety of road types, from paved to native substrate. On top of all this we have a multitude of uses. There should be something out there for everybody. Lets not just manage the entire forest for the majority. Lets manage the majority of the forest for the majority of the people and the minority of the forest for the minority of the people. (Individual, No Address - #A27068.15165)

BALANCED WITH A NEED AND COST/BENEFIT ANALYSIS

The Forest Service must take an inventory of the desired uses and determine the reasonable division of resources needed to meet those uses to a satisfactory degree. Final decisions should be based upon: the level of demand for certain uses, the amount and type of land required for meeting that demand, the relative societal costs and benefits of each type of use, and the ability of other land ownerships to meet the demands within a specific region. (Association, Minneapolis, MN - #A19249.13230)

1144. Public Concern: The Forest Service should grant proportional access among user groups based on need for solitude.

ALLOCATE MORE LAND AREA FOR NON-MOTORIZED USERS

Generally, solitude and quiet are two of the highest values sought by non-motorized recreationists and those desiring wilderness, primitive, and semi-primitive experiences. On the other hand, solitude and quiet are generally lower on the list of experiences desired by those seeking more developed-type recreation experiences and by motorized users, usually falling below social experiences with his/her companions and thrill-seeking. Therefore, the seekers of wilderness, primitive and semi-primitive recreation experiences <u>require</u> larger, more dispersed areas than do motorized recreationists, even though

the motorized recreationist can cover many times more ground in a day than can his non-motorized counterpart. (Individual, Dillon, MT - #A28767.70320)

Another misconception is the idea that people are being excluded from public lands if they can't drive to their destination. On the Medicine Bow National Forest, there are nearly no areas left which are more than 1/2 mile from a road. I would say that those of us that want quiet, non-motorized access are the ones that have been excluded! (Individual, No Address - #A27082.75800)

1145. Public Concern: The Forest Service should take into consideration the available opportunities for activities on other public lands when making allocation decisions.

Can't we categorize the outdoor activities, for example: Conservation/no human use, hiking, fishing, hunting, ATV, automobile four wheel drive, etc., and set aside ideal locations that suit each specific activity. Each federal forest would need to be analyzed on a state-to-state basis. For example being from Wisconsin there are plenty of state fishing lakes available so none of the federal land would need to be set aside for fishing in Wisconsin. I fail to see why this has to be an all or none situation. Compromise and do what's right for all Americans. (Individual, Burlington, WI - #A14172.15111)

User Conflicts

1146. Public Concern: The Forest Service should designate separate areas for competing uses.

TO MINIMIZE USER CONFLICTS

We have to share, and we have to be smart about our environment. I believe that we also have to be considerate of others who don't take the same approach to enjoying our forests; however, I also believe that the majority should rule when it comes to recreation. Designating areas for specific activities, with areas based on percentage of use, is a good way to keep opposing enthusiasts apart. For example, I'm finding that it keeps snowmobilers and cross-country skiers satisfied for the most part in places like Mt. St. Helens and Newberry Caulderra. Only when the skier ventures onto the snowmobilers' trails, which they are allowed to do, is there a problem. The only way to manage this is on a local level. (Individual, Eagle Creek, OR - #A29956.15160)

If you close all the unofficial routes, and define an area as "roadless" even though it really isn't, you will stir up a hornet's nest. If you work with OHV groups and leave them a place to play, you will be able to save the places that really should be saved with a minimum of conflict. I think there is room for everyone. (Individual, Sandia Park, NM - #A26171.15160)

The citizens of the United States own the Forest and should be able to enjoy them. There could be areas where certain activities could be designated so different groups could utilize the forest without competing with each other.

Designate areas so the competing groups can all have an area to enjoy. (Individual, No Address - #A457.25300)

FOR NON-MOTORIZED AND MOTORIZED USES

First, it is important to say that I am a backpacker AND a motorcyclist. However, on the issue of use of the forest, I must strongly suggest that the two uses (hiking and off-road vehicle use) cannot co-exist. They simply must be separated by significant distances to assure a true outdoor, wilderness experience for the non-motorized. The noise of motors carries many miles in the outdoors. I do not go into the woods to hear what I can hear from an office parking lot or mall alongside a freeway. If the uses are not kept separate, I simply lose my right to enjoy many miles of our national forests. There has long been

the concept that the rights of some end where they encroach on the rights of others. That concept must be applied here.

Please notice that I am not suggesting there cannot be two uses; however, those who suggest co-use plans simply are deaf or riding noisy machines. In many places, the use of 4-8 mile buffer zones (noise can carry that far) may not be practical. In those cases, the whole area must be given up to motorized traffic or that traffic must be banned; there is no other real choice. In areas where there are no roads, we do not need roads; these are the last few, precious gems of our national heritage. Do not give them away to those who pass through so quickly, they don't see more than a freeway rider anywhere in the country. (Individual, Richmond, KY - #A4606.91221)

FOR DIFFERENT MOTORIZED USES

The AMA promotes the development and maintenance of multiple use trails. These trails provide the widest variety of recreational opportunities. However, in some cases it may be prudent to restrict trail/area access to specific types of OHVs. For example, a relatively low powered single track OHV may be less disruptive, and therefore require less route maintenance, than larger more powerful two track vehicles. (Organization, Pickerington, OH - #A3645.90420)

THAT ALLOW MOTORIZED USERS TO VIEW NON-MOTORIZED AREAS

Align non-motorized area boundaries so that they do not encroach or eliminate trails located at the edge of the boundaries. Provide for motorized trails and vista points on the boundaries outside of the non-motorized areas so the motorized visitors can view those areas. (Organization, Helena, MT - #A13226.91110)

BY ADJUSTING ROADLESS AREA BOUNDARY LINES

I find the WI roadless areas to have small 'core' areas due to the fact that 95% of Roadless areas is surrounded by roads and by the fact that most of the roadless areas are very small and even smaller by Western standards. Small adjacent roadless areas divided by town roads is not Wilderness. Selecting a USFS tract of land by road density does not allow up front weighting for other resource characteristics. In Wisconsin, winter snowmobile Trail use on the 1984 RARE II roadless lands is real significant, but is not fairly considered under current USFS Roadless.

Just moving a roadless boundary 1000 ft from a Class A road to the edge of a winter snowmobile trail would offer conflict resolution! Trying to keep a snowmobile trail between Wilderness and Wild Rivers is a challenge that few planners want to solve.

As you know, Snowmobiling lasts about 100 days per year in Northern Wisconsin on all USFS lands. The season is enjoyably repeated year after year by 600 Wisconsin Snowmobile Clubs and other sledders.

Wisconsin does not need a whole lot of 2nd rate Wilderness based upon the current carryover Roadless inventory land selection. (Individual, Thiensville, WI - #A28617.45611)

1147. Public Concern: The Forest Service should not confuse use conflicts with user conflicts.

There is a huge distinction between the "use conflict" addressed in the Nixon and Carter executive orders and the "user conflict" wording in the administrative guidebook. I have Sierra Club documents that encourage "citizens" to actively promote "user conflict" (in quotes, no less) in order to browbeat land managers into closing an area to motorized recreation. That's garbage.

Genuine use conflict occurs when physically-incompatible activities—for example, mining and grazing, or logging and downhill skiing—are simultaneously desired on the same parcel. But skiers having a hissy fit because there's an active timber sale or mining operation within the viewshed is merely a conflict generated because a "user" has a bad attitude. Where is the spirit of multiple use and reasonable compromise for these whiners? It's nonexistent—they don't care if anyone else is happy or angry, so why accommodate them at all? Two way street, dudes. (Individual, Whitefish, MT - #A13242.15161)

1148. Public Concern: The Forest Service should allow activities according to the landscape's ability to tolerate them.

Different landscapes are equipped to handle different activities. I think that all users must be prioritized by the percentage of the American public that participates in that activity. For example, I'm sure more people hiked in the National Parks last year than snowmobiled. If the activity is hindering an ecosystem's ability to manage itself, such as the snowmobiling in Yellowstone is resulting in de facto bison population control, then that activity should be prohibited. Specific activities should not be allowed that disrupt those functions that make an ecosystem function properly. Some systems are perfect only for hiking, where others can tolerate a much wider use of visitor activities like camping, bicycling, and rappelling. But again, if an activity is found to damage the system, it should be prohibited. If that activity ends up being prohibited on all public lands, so be it. We cannot allow our public lands to be damaged by special interest groups. These lands belong to everyone, including generations to come. (Individual, No Address - #A29243.90000)

1149. Public Concern: The Forest Service should alleviate crowding.

BY MAKING MORE LAND AVAILABLE FOR RECREATION

The population of the United States is continuing to increase. This places additional pressures on the public lands available for recreation in local parks, state parks, national parks and the national forests. In many areas public lands are being so over utilized that it is degrading the quality of the recreational experience for visitors and causing those in charge of managing the facilities to consider limiting access. This is not in the best interest of the American public or the recreational lands currently in use. The Forest Service should be playing a key role in assuring that there are sufficient public lands available to the public to ensure that the recreational needs appropriate to the National Forests are met, now and in the future. Limiting the public access to millions of acres of public lands will only place an additional burden on the land that is currently accessible, and potentially deny access to some in the future if access quotas are deemed necessary.

As the demand for public access to public lands continues to increase, which it will continue to do as the U.S. population continues to increase, the Forest Service should plan for increased public use of Forest Service land, and how to best provide for the additional public access necessary to prevent additional damage from over use to the areas already utilized. More people will be coming for recreational opportunities in the national forests. That fact is inevitable. The Forest Service should be planning for that and making the land available to the U.S. citizens who are the true owners of the property. (Individual, Crystal River, FL - #A6257.91110)

As a Westerner, a rancher, and an avid public lands user—I have a concern. All the campgrounds are full, the trails are crowded, hunting season is a 3-Ring Circus. We have an increasing population and yet our recreational opportunities (public land) have not increased (at least not as fast). Used to be you could drive to wild areas for a family picnic. Now all the roads are more used and the land they access is more abused. The only way to get to pristine land is to hike and all the tails are crowded with others trying to find pristine wilderness. The congestion is itself destroying the land's pristine quality.

So two things, I believe, need to be done:

1 Keep Roadless areas—Roadless!

2 Provide more land to a burgeoning population! (Individual, Pritchett, CO - #A15216.10111)

BY IMPLEMENTING THE ROADLESS AREA CONSERVATION RULE

I'm writing to ask you to please keep the Roadless Area Conservation Rule just as it is. We need the Federal protection for the last beautiful, pristine areas of our public lands, and there are so few roadless areas left as it is. Everywhere I go in the mountains I find miles and miles of roads and ATV/motorcycle trails before I can get to quieter trails which don't allow motorized travel. There are now so many people who seek out and visit these places of solitude for good fishing, hunting, spectacular hiking, backpacking and climbing, that already many of these areas seem pretty crowded. (Individual, Bozeman, MT - #A8756.10150)

Motorized Recreation

Summary

General Comments – General comments on motorized recreation focus on the appropriate use of motorized vehicles and the adequacy of signs. According to some individuals, the Forest Service should require local forest managers to determine the appropriate use of motorized vehicles based on science rather than socio-economic factors. Some suggest the Agency implement rules on proper and responsible motorized use. One Organization requests that the Forest Service create a standard signing convention to avoid user confusion regarding seasonal motor vehicle restrictions.

Adequacy of Analysis – Several Organizations ask the Forest Service to more adequately analyze recreation management specifically with respect to motorized recreation. One group requests that the Agency evaluate the type of motorized experiences desired by users, commenting that environmental documentation must evaluate the type and quality of experiences that motorized visitors enjoy and want maintained in the area. Others assert that the Agency has not given adequate attention to the growing demand for motorized recreation opportunities, and so suggest evaluating the available mileage of off-road vehicle trails versus the available mileage of non-motorized trails and cross-country opportunities. Likewise, one individual requests that the Agency address the current level of motorized recreation on classified and unclassified roads within roadless areas in order to assess the costs of closing these areas and concentrating use in other areas.

Education – Some individuals suggest that the Forest Service educate the public about responsible motorized recreation. They believe that education is key to the success of this type of recreation and point out that people have to be educated to drive a car, why not require the same type of program for off road vehicles, snowmobiles, water crafts, etc.

Cumulative Impacts on Motorized Recreationists – Some respondents assert that the Forest Service should address the cumulative impacts of the Roadless Area Conservation Rule and other management proposals on motorized recreationists. According to one organization, it would be fair to analyze all impacts of all recreational activities, nonmotorized and motorized alike and then do a cumulative impact assessment before making decisions on what will be allowed and what won't be allowed. Other respondents suggest that the impacts to be evaluated include the impacts of all past motorized closures and road and trail obliterations; impacts of motorized closures as a result of wildfire; and impacts associated with environmental justice.

Suggestions for alleviating these impacts include developing a management alternative which incorporates all existing motorized roads and trails and restricts motorized travel to those travelways; closing certain areas to prevent user-created trails while allowing use of existing motorized routes; and reclassifying roadways to restricted-width or unrestricted-width motorized trails to provide motorized recreation opportunities, and then removing these roads from the roads inventory.

Motorized Recreation –A number of respondents urge the Forest Service to allow motorized recreation. One Organization suggests that in order to preserve motorized access, the Forest Service should develop a comprehensive inventory of all existing motorized routes. Some suggest the Agency should designate land specifically for motorized and mechanized access in areas where environmental damage will be minimal. Others suggest that the Forest Service

specifically allow motorized vehicles in roadless areas—motorcycles, six- or eight-wheeled vehicles, and battery-operated vehicles for the handicapped. One individual points out that there is a substantial number of citizens who enjoy this type of recreation, and while setting aside wilderness areas is appropriate, the Agency must take into account the number of people that would like to have equal opportunity to enjoy the rest of the national forests. One respondent suggests the Forest Service enhance opportunities for motorized recreation by including "roads and trails systems with loops, destinations such as lakes, mines, scenic overlooks, and interconnections to other forests and regional trails." Finally, some suggest that the Forest Service should not use disturbance of wildlife as a reason to deny motorized access, since studies have shown that hikers disturb wildlife more than motorized visitors. A few individuals urge the Forest Service to allow airplanes in roadless areas by maintaining primitive backcountry airstrips and airstrips at ranger stations.

Other respondents believe that motorized recreation should be restricted or prohibited, particularly in roadless areas. One individual lists reasons such as air pollution, noise pollution, and environmentally destructive. These respondents assert that this type of recreation ruins the wilderness experience for everyone. People suggest specifically prohibiting two-cycle engines, gasoline, diesel, and alcohol engines, and vehicles that require more than a single track. Respondents say these prohibitions are necessary to eliminate user created trails and to alleviate the vandalism and crime, animal harassment, and increased wildfire danger which, they claim, follow from motorized activity. A few individuals also suggest prohibiting helicopters, airplanes, and powerboats in roadless areas.

Motorized Recreation General

1150. Public Concern: The Forest Service should require local forest managers to determine the appropriate use of motorized vehicles.

BASED ON SCIENCE RATHER THAN SOCIO-ECONOMIC FACTORS

Absolutely no motorized vehicles, I don't care to have local managers decide this and other activities based on "socio-economic" factors, rather on science. (Individual, Missoula, MT - #A4935.91221)

1151. Public Concern: The Forest Service should implement rules on proper and responsible motorized use.

TO ALLOW ACCESS TO PRIVATE AND PUBLIC LANDS

Rules on proper and responsible motorized vehicles on Forest Service lands should be implemented to allow access to private and public properties within inventoried roadless areas. (Individual, Ephraim, UT - #A11576.91211)

1152. Public Concern: The Forest Service should create a standard signing convention.

TO AVOID CONFUSION REGARDING SEASONAL MOTOR VEHICLE RESTRICTIONS

There needs to a standard signing convention that is easier to understand. For example, there are often misunderstandings about seasonal motor vehicle restrictions due to the "No" symbol with the actual closure period shown below in small text that is often not seen or understood. In this case, the road or trail is open except during the period shown below but it is often misinterpreted as closed. (Organization, Helena, MT - #A13226.15163)

Adequacy of Analysis

1153. Public Concern: The Forest Service should evaluate the type of motorized experiences desired by users.

The motorized roads and trails that would be closed under the Roadless Rule are, for the most part, primitive roads and trails that provide the ideal experience sought by motorized visitors. The environmental document must adequately evaluate the type and quality of experiences that motorized visitors enjoy and want maintained in the area. (Organization, Helena, MT - #A13226.91211)

1154. Public Concern: The Forest Service should evaluate the available mileage of off-road vehicle trails versus the available mileage of non-motorized trails and cross-country opportunities.

The document and decision must adequately address the need for motorized access and recreation in the National Forest and adequately allow for mitigation necessary to offset the trend of past closures. The cumulative effect of this trend has created an allocation of recreation opportunities in the National Forest strongly in favor of non-motorized interests. The process must evaluate and identify how many miles of OHV trails are available to motorized recreationists in the National Forest versus the miles of trails and cross-country travel opportunities available to non-motorized visitors. (Organization, Great Falls, MT - #A15315.45500)

Identify and compare the acreage available for use by motorized vs. non-motorized visitors. For example, this comparison should report the area available for motorized visitors as the number of feet of trails times a width of 4 feet divided by 43,560 square feet per acre versus all of the acreage in the national forest available to non-motorized visitors. (Organization, Helena, MT - #A13226.15168)

1155. Public Concern: The Forest Service should address the current level of motorized recreation on classified and unclassified roads within roadless areas.

IN ORDER TO ASSESS THE COSTS OF CLOSING THESE AREAS AND CONCENTRATING USE IN OTHER AREAS

The reevaluation must clearly show the current level of motorized recreation on classified and unclassified roads within the so-called roadless areas. The costs of closing these areas and concentrating use in other areas must be addressed. (Individual, Alturas, CA - #A28581.45500)

1156. Public Concern: The Forest Service should include accurate emissions readings in EISs.

Use fair guidelines in the EIS and require accurate emissions readings to be included in the EIS. (Individual, Lennon, MI - #A5999.15169)

Education

1157. Public Concern: The Forest Service should educate the public.

ABOUT RESPONSIBLE MOTORIZED RECREATION

Education is key to the success of every program. We must communicate to everyone the need for people to stay on roads and trails. How to ride safely. How to respect others and the environment. We give driver's education to all those who wish to drive a car, but we do not mandate any education for four-wheelers, snowmobiles, water crafts or mountain accessible vehicles. Maybe it could be part of the syllabus taught in schools. (Individual, Spring City, UT - #A25950.15163)

Cumulative Impacts on Motorized Recreationists

1158. Public Concern: The Forest Service should evaluate the cumulative impacts to motorized users of reduced motorized access.

Motorized recreationists gave up cross-country travel opportunities as part of the Three-State OHV Record of Decision. This lost opportunity included instances such as retrieval of big game and trail bike riding where cross-country travel was generally acceptable. If the concern over the creation of motorized trails by cross-country travel is environmentally unacceptable, then it should also be applied equally to cross-country hiking and mountain climbing. Cross-country hiking and mountain climbing also create trails that provide visible evidence on the landscape of mankind's existence. For that matter, non-motorized trails and motorized trails are often equal in visual and resource impact. Why are non-motorized trails acceptable and motorized trails not acceptable? This position is commonly used to eliminate motorized recreation opportunities and demonstrates that the impacts of non-motorized recreation opportunities are not evaluated with the same criteria used to justify elimination of motorized recreation opportunities. The document must evaluate the cumulative impact associated with the loss of motorized cross-country travel opportunities. The formulation of alternatives must include new motorized recreation opportunities to mitigate the loss of motorized cross-country recreation opportunities. (Organization, Helena, MT - #A13226.91211)

The loss of motorized recreation and access opportunities due to area closure with motorized travel restricted to designated routes compared to existing conditions must be adequately addressed in the document and factored into the decision. The proposed area closure action without closing of any existing roads and trails is a significant loss of recreation and access opportunities to motorized visitors. The lack of adequate consideration of area closure impacts on motorized visitors in the project area combined with the same lack of analysis in all travel plan documents has produced a significant cumulative impact that must be adequately evaluated and corrective measures must be implemented. (Organization, Helena, MT - #A13226.10141)

The environmental document must consider the following visitor profiles in addition to OHV enthusiasts as motorized visitors who use primitive roads and trails in the forest. People out for weekend drives, sightseers, picnickers, campers, hunters, fishermen, snowmobile enthusiasts, woodcutters, wildlife viewing, berry and mushroom pickers, equestrians, mountain bikers, and physically challenged visitors who must use wheeled vehicles to visit our public lands. The cumulative impact of all statewide-motorized closures on all of these visitors must be included in the environmental document. A statewide analysis is required because cumulative effects are forcing motorized visitors to travel farther and farther to fewer and fewer places to find motorized access and recreation opportunities. (Organization, Helena, MT - #A13226.70100)

IN CONJUNCTION WITH OTHER MANAGEMENT PROPOSALS

The environmental document must evaluate how all of the policy proposals over the past year have overwhelmed the public. There is no way that the public could have evaluated and commented on each proposed action. The cumulative impact of an overwhelming number of proposals is decision-making that does not provide for the needs of the public. These proposals include ICBEMP (inter-agency), 3-States (Montana, North and South Dakota) OHV Strategy, National BLM OHV Strategy, USFS Roadless, USFS Roads Policy, USFS Strategic Plan, North Belts Travel Plan, Clancy-Unionville Travel Plan, Whitetail/Pipestone Travel Plan, North Divide Travel Plan, South Divide Travel Plan, Blackfoot Travel Plan, South Belts Travel Plan, Lewis and Clark National Forest Travel Plan update, Montana State Trail Plan PEIS, Montana State Trail Grant Program PEIS, Grizzly Bear Recovery Plan, Post-fire Weed Mitigation EIS, Fire Salvage EIS, and other local travel plan actions in each National Forest. Motorized visitors have had to devote the majority of their available energy and time addressing local and national level travel plan actions. The combination of all of these actions has created a cumulative effect on motorized visitors by consuming their time, money, and quality of life. Very few motorized recreationists are paid to be involved in the protection of their interests. Additionally, this cumulative effect has lead to the loss of opportunity for motorized recreationists to further the awareness and

education of all motorized visitors in areas such as proper riding ethics, safety, and environmental protection. This cumulative effect has also reduced the opportunity for motorized recreationists to improve and maintain existing motorized opportunities. This includes reduced maintenance of trailheads and trails and reduced ability to undertake mitigation projects to protect the environment and public safety. All of these cumulative effects must be addressed in the document and decision. (Organization, Helena, MT - #A13226.16000)

INCLUDE THE IMPACTS OF ALL PAST MOTORIZED CLOSURES AND ROAD AND TRAIL OBLITERATIONS

Timber sales have included many motorized closures as associated actions. Many timber sales with motorized closures were done without adequately addressing the impact on motorized visitors. Many of these motorized closures were done as a concession to those opposed to the timber sales and without input from motorized recreationists. Many of the closures and obliterations included historic travel ways used for exploration, mining, and travel in the early days. The environmental document must evaluate all past motorized closures and road and trail obliterations done as part of timber sales and the cumulative impact of those closures on motorized access and recreation. Furthermore, closures from past timber sales should be mitigated by connecting old and new travel ways to create a looped motorized trail system. (Organization, Helena, MT - #A13226.65200)

INCLUDE IMPACTS OF MOTORIZED CLOSURES AS A RESULT OF WILDFIRE

The fires of 2000 have required a significant number of motorized closures and these cumulative impacts have not been considered. All of these cumulative impacts on motorized visitors must be adequately addressed and provided for in the environmental document and decision-making. (Organization, Helena, MT - #A13226.30400)

INCLUDE IMPACTS ASSOCIATED WITH ENVIRONMENTAL JUSTICE

There is no comparable national recreation trail for motorized visitors equivalent to the Continental Divide Trail (CDT), Pacific Crest Trail, National Recreation Trail (NRT) and other national non-motorized trails that travel a long distance and interconnect with other forests. If motorized recreationists had national trails, they would see considerably more use. Non-motorized recreationists have considerably more national trail recreation opportunities than motorized recreationists. The document needs to evaluate the cumulative impacts and environmental justice issues surrounding the lack of national motorized trails on motorized recreationists and then identify and implement measures necessary to mitigate these impacts on motorized recreationists. (Organization, Great Falls, MT - #A15315.15160)

INCLUDE NEGATIVE ECONOMIC IMPACTS

The environmental document must evaluate the social and economic impact to motorized recreationists of not having motorized recreational opportunities in the nearby forests. These impacts include the cost of having to travel farther and farther in search of fewer and fewer motorized recreational opportunities in times of increasing travel costs. A 200-mile roundtrip costs at least $70 and that cost will continue to increase substantially in the future. The document must evaluate the economic cost of fewer motorized recreation opportunities on motorized recreationists. The document must evaluate the cumulative effect of all management decisions that contribute to these social and economic impacts on motorized recreationists. (Organization, Helena, MT - #A13226.75400)

1159. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.

BECAUSE IT UNFAIRLY IMPACTS MOTORIZED USERS

The proposed Roadless Rule selected by the Forest Service would eventually close the majority of existing roads and trails to motorized recreation. This preferred alternative forces motorized visitors and recreationists to start with the worst case scenario and then struggle to add routes currently in use back into the process at a late stage using the public comment. This course of action places an enormous burden on motorized visitors just to maintain the status quo. This process is providing preferential treatment for non-motorized visitors who do not have to identify routes and challenge the process to protect their recreation opportunities. We do not understand why the roadless rule process has been

devised to put motorized visitors at a disadvantage. We request that this procedure be evaluated and corrected. (Organization, Helena, MT - #A13226.10130)

BECAUSE ROADLESS STATUS WILL TRUMP EXISTING FOREST DESIGNATIONS

While the DEIS indicated that recreation use will not be adversely affected, we note that since some of the inventoried roadless areas were classified in the land and resource management plan as semi-primitive motorized recreation, and wildlife emphasis, a prohibition on roads and reconstruction would preclude meeting these management objectives. (Elected Official, Roseburg, OR - #A11811.25300)

1160. Public Concern: The Forest Service should develop a management alternative which incorporates all existing motorized roads and trails and restricts motorized travel to those travelways.

TO AVOID CONTRIBUTING TO FURTHER CUMULATIVE IMPACTS ON MOTORIZED RECREATIONISTS

A reasonable rulemaking alternative is needed in order to avoid contributing to the significant cumulative impacts that motorized recreationists have experienced. A reasonable alternative would incorporate all existing motorized roads and trails and restrict motorized travel to those travel ways. The Forest Service must adequately evaluate a reasonable alternative in the environmental document and decision-making. In order to avoid contributing to further cumulative impacts, we request that an alternative based on incorporating all existing motorized roads and trails and restricting motorized travel to those travel ways be included in the evaluation and selected by the decision-makers. (Organization, Helena, MT - #A13226.45400)

1161. Public Concern: The Forest Service should close certain areas to prevent user-created trails while allowing use of existing motorized routes.

BECAUSE THE CUMULATIVE IMPACTS OF THE TRAVEL PLAN AND THE RULEMAKING PROCESS ON MOTORIZED RECREATIONISTS HAVE BEEN SIGNIFICANT

Most of the primitive motorized roads and trails in roadless areas are not new or “user created” travelways. These roads and trails have existed for many years. The public has relied on them for access to the forest for many years and for many purposes. This pattern of use is well established. A reasonable alternative would use area closure to prevent the creation of unwanted trails by visitors and, at the same time, allow the public to use all of the existing motorized routes. Too many decisions have been enacted without the development of this reasonable alternative. The cumulative impact of the travel plan and rulemaking process on motorized access and recreation opportunities has been significant. We request that this reasonable alternative be included in the environmental document as the preferred alternative. (Organization, Helena, MT - #A13226.45514)

1162. Public Concern: The Forest Service should reclassify roadways to restricted-width or unrestricted-width motorized trails.

TO AVOID CONTRIBUTING TO THE CUMULATIVE IMPACTS ON MOTORIZED RECREATION

The environmental document must accurately address the significant negative impacts associated with disturbing existing stable roadways in order to obliterate the existing roadbed. A more viable alternative would be to reclassify the road to either restricted-width or unrestricted-width motorized trail. The preferred alternative should make practical use of this management tool and the benefits that it provides including reduced sedimentation impact, reduced fisheries impact, reduced noxious weed impact, much less construction cost, reduced road inventory, reduced road maintenance and increased opportunities for motorized recreationists. Reclassifying roadways to restricted- or unrestricted-width motorized trail also avoids contributing to cumulative impacts on motorized recreationists. (Organization, Helena, MT - #A13226.45500)

The Forest Service’s current management directive is to aggressively decommission non-beneficial or unclassified roads, reduce the existing backlog on road maintenance and reconstruction, and reduce the

resource impacts of the current roads network. The Forest Service in the Roadless Rule EIS reported that the backlog of forest road maintenance was about $8.4 billion. This estimate includes many primitive roads and trails that motorized recreationists would prefer not to have improved. The challenge of these types of primitive roads and trails is just what most motorized recreationists are looking for. Therefore, this maintenance effort is overstated and a more reasonable alternative would be to incorporate reasonable mitigation measures and convert roads to unrestricted-width or restricted-width trails to provide motorized recreation opportunities and then remove these roads from the roads inventory. (Organization, Helena, MT - #A13226.45500)

Allow Motorized Recreation

1163. Public Concern: The Forest Service should develop a comprehensive inventory of all existing motorized routes.

TO ASSIST IN PRESERVING MOTORIZED ACCESS

A fair process would start with a comprehensive inventory of all existing motorized routes. Then, in order to avoid further cumulative loss and significant impact on motorized access and recreation opportunities, the Roadless Rule process must include a preferred alternative based on preserving all existing motorized routes. Any significant negative impact associated with a specific motorized route would be the basis for an evaluation to close or keep that route open. The cumulative loss of motorized recreation and access opportunities in the national forests has been significant. In order to avoid further cumulative impacts, the closure of an existing motorized route would be offset by the creation of a new motorized route. (Organization, Helena, MT - #A13226.91211)

1164. Public Concern: The Forest Service should designate land for motorized and mechanized access.

I would favor some designation other than wilderness for many of these lands, so as to permit limited motorized or mechanical access where appropriate, on existing trails. Four wheelers should be limited to forest roads. Trail bikes and mountain bikes only, on trails. (Individual, Manhattan, MT - #A671.25360)

WHERE ENVIRONMENTAL DAMAGE WILL BE MINIMAL

I personally feel strongly about public access to national parks/forests employing motorized vehicles. There is an increasing trend for ATVs, off-road vehicles and snowmobiles to wreck the nature of wildness for people and wildlife. I would like to see “quiet” traditional uses upheld such as snowshoing, cross-country skiing, canoeing, hiking, biking etc. Having said this I know that there is a responsibility to provide for these other activities in areas less prone to impacting values. Sort of what happens when a city finally decides upon the location for an airport. In the case of dirt bikers-maybe a dune area inland of a beach where annual storms “clean the slate” (Oregon) or alkali playa, subject to inundation (Nevada), can be designated use areas. (Individual, Craig, AK - #A778.90100)

1165. Public Concern: The Forest Service should allow motorized vehicles in roadless areas.

MOTORCYCLES

While our wilderness areas must be preserved, there must be balanced use for the benefit of all citizens. Motorcyclists are a substantial group within this country and have an equal right to use public lands as hikers, boaters, etc. (Individual, Darien, CT - #A595.91221)

SIX OR EIGHT WHEELED VEHICLES

Also permit ATV 6 or 8 wheelers allowed, NO 4 WHEELED. (Individual, Strongsville, OH - #A11136.91221)

BATTERY-OPERATED VEHICLES FOR THE HANDICAPPED

No motorized vehicles allowed, except for battery operated ones for the handicapped. (Individual, Coeur d'Alene, ID - #A4798.91221)

TO ACCESS AND MAINTAIN GRAZING AREAS

Roadless area protection should not be carried out in a manner as would require any cutbacks in domestic livestock grazing, or the curtailment of the use of any motorized equipment which has been traditionally used in the area to access or maintain grazing improvements or supervise livestock operations. For example, if a rancher needs to use ATVs for access, that should be permitted, as the economics of ranching operations in today's world may not always make horse or foot access practical. (Individual, Vail, CO - #A5371.90100)

TO CARRY OUT BIG GAME FOR PROCESSING

Allow only ATVs to bring big game, such as deer, to be processed. (Individual, Erie, PA - #A7326.91211)

DEPENDING ON THE TERRAIN IN THE AREA

The type of vehicle most suited to the terrain must be considered. Steep side hills should be accessed only by single-track vehicles (motorcycles and scooters) whereas more gentle areas may accommodate 3 and 4-wheeled ATVs. ATVs must not be allowed on single-track trails. The upcoming OHV Plan should be utilized to help address this issue and guide the overall Forest Plan. (Individual, Evergreen, CO - #A19178.91211)

AS REQUIRED BY THE NATIONAL ENVIRONMENTAL POLICY ACT

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 wide sharing of life's amenities must include recognizing and meeting the need for motorized access and recreation opportunities in the project area. We do not understand why this area and many others in the National Forest cannot be shared with all forest visitors. We meet so few hikers on the roads and trails that we use and we just don't understand the problem. Is it reasonable to excessively accommodate forest visitors that are not moderately tolerant and sharing? The evaluation in the environmental document, the decision-making and the current allocation of motorized versus non-motorized recreation and access opportunities in the National Forest must provide for an equal and wide sharing of life's amenities with motorized visitors. (Organization, Helena, MT - #A13226.20203)

1166. Public Concern: The Forest Service should enhance opportunities for motorized recreation.

The second principle of rulemaking actions should be to enhance the level of opportunities for motorized visitors in order to be responsive to the needs of the public. Enhancement could include roads and trails systems with loops, destinations such as lakes, mines, scenic overlooks, and inter-connections to other forests and regional trails. The document must develop alternatives that enhance opportunities for motorized recreationists and the decision-making must enact them. (Organization, Helena, MT - #A13226.91211)

1167. Public Concern: The Forest Service should revise Management Areas 11 and 12 to allow motorized recreation.

Please change the Forest Service's MAs 11 and 12 to allow motorized recreation to continue. (Individual, Superior, MT - #A6008.91211)

1168. Public Concern: The Forest Service should not use disturbance of wildlife as a reason to deny motorized access.

BECAUSE STUDIES HAVE SHOWN THAT HIKERS DISTURB WILDLIFE MORE THAN MOTORIZED VISITORS

A study of National Park elk habituated to human activity and not hunted were still more sensitive to persons afoot than vehicles (Shultz, R.D. and James A. Bailey "Responses of National Park Elk to Human Activity", Journal of Wildlife Management, v42, 1975). Therefore, hikers disturb elk more than motor vehicles and "disturbance of wildlife" must not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors. A study of the heart rate of elk found that humans walking between 20 to 300 meters from the elk caused them to flee immediately 41% of the time while an OHV passing within 15 to 400 meters of the elk caused them to flee 8% of the time (Ward, Lorin A., Jerry J. Cupal, "Telemetered Heart Rate of Three Elk as Affected by Activity and Human Disturbance" Planning for Trailbike Recreation, U.S. Department of the Interior Heritage Conservation and Recreation Service, 1976). Therefore, hikers disturb elk more than motor vehicles and "disturbance of wildlife" must not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors. (Organization, Helena, MT - #A13226.53300)

A study of mule deer found that 80% fled in reaction to encounters with persons afoot while only 24% fled due to encounters with snowmobiles (David J. Freddy, Whitcomb M. Bronaugh, Martin C. Fowler, "Responses of Mule Deer to Persons Afoot and Snowmobiles", Wildlife Society Bulletin, 1986). Therefore, hikers disturb elk more than motor vehicles and "disturbance of wildlife" must not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors. (Organization, Helena, MT - #A13226.53300)

1169. Public Concern: The Forest Service should allow airplanes in roadless areas.

THOSE THAT CAN LAND ON WATER

All motor vehicles should be prohibited except airplanes that can land on lakes. (Individual, Prescott, AZ - #A21064.90110)

BY MAINTAINING PRIMITIVE BACKCOUNTRY AIRSTRIPS

I strongly endorse retaining roadless area access via existing and historical primitive backcountry airstrips.

The small aircraft capable of operating from these strips have minimal to no adverse effect upon the areas. In addition, the aficionados of "bush flying" that use the strips typically perform all the requisite minimal, low-impact maintenance required to keep the strips useable by light aircraft, and absorb related costs themselves.

In addition to offering recreational access for hiking, camping, and fishing (while reducing land vehicle impact) these strips can, on occasion, be useful for medi-vac and fire fighting purposes, and can possibly serve as emergency landing fields for aircraft traversing the area. (Individual, Longmont, CO - #A27112.90100)

BY MAINTAINING AIRSTRIPS AT RANGER STATIONS

Existing airstrips at ranger stations (Bob Marshal Wilderness) should be maintained and emergency evacuation by helicopter should be permitted. Float-planes should be limited to emergency and occasional access for rangers. (Individual, Missoula, MT - #A30559.90000)

1170. Public Concern: The Forest Service should allow competitive motorized events in roadless areas.

Competitive, motorized group events should be expressly allowed. (Individual, Greeley, CO - #A28995.91210)

Do Not Allow/Restrict Motorized Recreation

1171. Public Concern: The Forest Service should prohibit motorized vehicles in roadless areas.

Specific activities that should be expressly prohibited in roadless areas would include operating motorized vehicles, especially snowmobiles and dirt bikes, and ATVs. These machines are extremely polluting, destructive to the ecology of the area, and drive away animals, as well as destroying the wilderness experience for non-motorized users for miles in every direction. (Individual, No Address - #A470.91221)

I am writing to express my opinion concerning roadless area conservation, in particular the use of off-road recreational vehicles. I feel the U.S. Forest service has an obligation to maintain existing roads as well as ensuring access to private property located adjacent to federal lands. I do not however, feel that it is the U.S. Forest Service's obligation to maintain and monitor roads for recreational vehicle use. I am a four-wheel enthusiast myself, and realize the impact that my vehicle has to wildlife and terrain. It is my opinion that there should be no use of these vehicles on federal lands for recreational purposes, due to the dangers that overuse can present. I can tell you from experience that it doesn't take long for these vehicles to start eroding the top-soil, the national parks are sanctuaries for the common man. They are a place where we can take our families to show them the wonders of nature, and the great land that is America. I feel that off-road vehicle use would be a distraction to those not in participation. Once again, it is my opinion that the U.S. Forest Service should reject all recreational off-road vehicle use in our national parks and forest areas. (Individual, Houston, TX - #A519.91221)

Roadless areas should be protected from destructive vehicle use. Vehicle use should not be allowed except by Forest Service employees in pursuit of their duties or emergency personnel. Off road vehicles, including the ATV and Snowmobiles are not environmentally friendly and they should not be allowed. Currently there are thousands of miles of ghost roads, illegal roads created by logging trucks, off road vehicles and ATVs, within the boundaries of our National Forests. (Individual, Coulterville, IL - #A114.90000)

All motorized activity should be prohibited in roadless areas—no motorcycles, cars, ATVs, or snowmobiles. (Individual, Bozeman, MT - #A624.91221)

TWO-CYCLE ENGINES

No two-cycle engine vehicles. (Individual, No Address - #A491.91221)

GASOLINE, DIESEL, AND ALCOHOL ENGINES

NO gasoline engines at all for anybody, for any reason. None. Only firefighting equipment may use engines. No one should be allowed to use a gas, diesel, etc. engine for ANY reason otherwise. Simple and effective. Try it, you'll like it. No concrete! No permanent building of any kind, period, except fire towers. No offices. No houses, no yards, no fences, no maintained trail, no footbridges, no shelters that are permanent. (Individual, Jackson, MI - #A7273.90000)

NO gas, diesel, alcohol, etc, engines. (Individual, Jackson, MI - #A7273.90110)

VEHICLES THAT REQUIRE MORE THAN A SINGLE TRACK

All activities that require a road (anything wider than a single track) like ATVs, and four wheeling should be prohibited. (Individual, Woodland Park, CO - #A14027.90110)

ON NEW BUT CLOSED ROADS

The use and availability of open roads to the public should be a local issue with a few guidelines, i.e. Quads (dirt motor bikes and motorcycles), snowmobiles should be prohibited on new, but closed roads. (Individual, Olympia, WA - #A20848.90000)

TO ELIMINATE USER CREATED TRAILS

I believe that the Roadless Area Conservation Rule would be improved by adding firm measures to curb the problems caused by motor vehicles that cut new paths on the terrain when they drive beyond authorized travel ways. This is a rapidly expanding problem in Nevada and Eastern California. (Individual, Carson City, NV - #A11788.91221)

DUE TO INCREASED VANDALISM AND CRIME

The problem we are now coming to grips with is ATVs and snowmobiles in the winter. With those modes of travel it is easier to litter and dispose of unwanted trash, appliances, hazardous waste and not be detected for some time. Summer, spring, fall, and winter present all the challenges one can imagine, wild parties in the Wilderness Areas, poaching, you can even catch disposable diapers and spare tires, even used appliances. Garbage and trash are being tossed in our waterways. (Individual, Morrisville, VT - #A7953.90110)

A final and often overlooked impact is serious crime; virtually all felonies that have occurred on the ANST (Appalachian National Scenic Trail) are within an easy walk of a motorized route. As you know, enforcement is difficult, and the problem is exacerbated where roads cross or are in the vicinity of the trail. (Organization, Harpers Ferry, WV - #A21737.90110)

DUE TO ANIMAL HARRASSMENT

Game animals are being harassed by adolescents on motorbikes and ATVs. We also have a small percentage of adults doing the same. The big problem everywhere is the manpower shortage. I would strongly urge you not to open any more access until such time as we have adequate manpower to police the areas once the door is open. (Individual, Morrisville, VT - #A7953.90110)

DUE TO INCREASED WILDFIRE DANGER

Just the rash of forest fires we are now experiencing should be warning enough. The weather of late has been too extreme. I have driven on the highways we now have and witnessed cigarettes being tossed from moving vehicles, along with cigars. (Individual, Morrisville, VT - #A7953.90110)

1172. Public Concern: The Forest Service should prohibit helicopters and airplanes in roadless areas.

The following activities should be completely prohibited in roadless areas: . . . . close overflight by helicopter or airplane guide server. (Individual, Port Angeles, WA - #A6179.90110)

Helicopters should not be permitted to land or to fly below 2,000 AGL over roadless areas. (Individual, West Glacier, MT - #A5946.90110)

1173. Public Concern: The Forest Service should prohibit powerboats in roadless areas.

NOT allowed; Roads, logging, mining, summer homes, resorts, and NO OFF ROAD VEHICLES, SNOWMOBILES, POWER BOATS, LOW FLYING AIRCRAFT, or hunting, except for the enlightened wildlife management. (Individual, San Jose, CA - #A6276.90110)

No outboard motors on lakes, and no motor vehicles on land, snowmobiles, ATVs, motorcycles, etc. (Individual, Caledonia, WI - #A7531.90110)

Other

1174. Public Concern: The Forest Service should seize vehicles that violate regulations in wilderness areas.

Protect only wilderness areas and allow the seizure of vehicles that violate wilderness areas. (Individual, Sparks, NV - #A4805.91211)

1175. Public Concern: The Forest Service should prohibit the development of recreational vehicle parks.

We do not need RV Parks. (Individual, Hobbs, NM - #A11008.90920)

1176. Public Concern: The Forest Service should clarify how roadless area designation would impact backcountry airstrips.

It is unclear how the roadless initiative might impact backcountry airstrips. These airstrips may be located in areas designated as roadless. We support backcountry airstrips as a valuable transportation resource that is of low environmental impact. (State Agency, Sacramento, CA - #A28870.16110)

Motorized Recreation – Off-Road Vehicles

Summary

General Comments – One Organization suggests that the Forest Service should use Executive Order 11909 as a management tool to govern management of off-road vehicles. They believe this is a powerful management tool that the Forest Service can use to maintain resources while providing diverse OHV recreational opportunities.

Funding – According to an Organization, federal and state agencies must evaluate why the OHV gas tax system does not function to serve the needs of OHV recreationists. Then a plan should be developed and implemented that will use OHV gas tax monies to address the needs of OHV recreationists. Another respondent writes that there should be no off-road vehicles in roadless areas, that there should be other places for them to ride.

Off-Road Vehicles – Some respondents assert that the Forest Service should allow off-road vehicle use in roadless areas. According to one individual, user conflicts seem to be the major issue facing all of the recreational uses and hopes that the Roadless Rule will not ban OHV/ORV use in these areas. This person believes there is minimal environmental damage.

Others state that the Forest Service should prohibit off-road vehicles in roadless areas. One respondent concludes, due to the damage caused by off-highway vehicles to soil, vegetation, water quality, wildlife, and solitude, all off road vehicles should be banned from inventoried roadless areas." A few individuals suggest restricting this activity by requiring off-road vehicle users to have permits. Rather than close the forest roads, offers one respondent, permits should be required areas for such activities as hunting, which would require a training session about respecting the land and the Forest Service would be able the one abusing the system.

Off-Road Vehicles General

1177. Public Concern: The Forest Service should use Executive Order 11909 as a management tool to govern management of off-road vehicles.

TO MAINTAIN RESOURCES WHILE PROVIDING DIVERSE OFF-ROAD VEHICLE RECREATIONAL OPPORTUNITIES

Executive Order 11909, signed by President Jimmy Carter on May 24, 1977, authorizes public land managers to close routes or areas negatively impacted "to the type of off-road vehicle causing such effects, until such time as he (the administrator) determines that such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence." The Executive Order is a powerful management tool that the Forest Service can use to maintain resources while providing diverse OHV recreational opportunities. (Organization, Pickerington, OH - #A3645.90420)

Funding

1178. Public Concern: The Forest Service should develop a plan to use gas tax money to address the needs of off-highway vehicle recreationists.

Fuel Used for off-road recreation in Montana is estimated at 20,199,323 gallons per year (Report ORNL/TM-1999/100, Federal Highway Administration). The State of Montana allows a refund of $0.2775 per gallon for off-road fuel use to account for the value of improvements and programs that purchasers of OHV gas do not receive through the federal highway program (http://www.mdt.state.mt.us/administration/gastaxrefund.html). Therefore, about $5,605,312 is paid by off-road recreationists in fuel tax each year and should be available to support OHV recreation. This amount of annual funding would be sufficient to address all OHV mitigation, maintenance and educational projects necessary to protect the environment and meet motorized recreationists' needs. However, very little of this money is returned to OHV recreation. Therefore, OHV recreationists have a substantial funding mechanism in place in the form of gas tax, yet very little of this tax is returned to OHV projects.

Federal and state agencies must evaluate why the OHV gas tax system does not function to serve the needs of OHV recreationists. Then a plan should be developed and implemented that will use OHV gas tax monies to address the needs of OHV recreationists. The document must evaluate justice issues surrounding the use of OHV gas tax monies for purposes not related to OHV recreation. The document must evaluate the cumulative effects on motorized recreationists of diverting OHV gas tax monies including the impacts associated with the lack of maintenance, the backlog of maintenance, the lack of mitigation projects, the lack of education and management programs, and the resulting loss of OHV opportunities and reduced quality of life for OHV recreationists. (Organization, Helena, MT - #A13226.17110)

1179. Public Concern: The Forest Service should use funds to enforce the exclusion of off-road vehicles from nondesignated areas.

Ban off road vehicles. Make areas for these vehicles. Then use funds to enforce their exclusion from the rest of the forest. (Individual, Ellijay, GA - #A8020.91221)

Allow Off-Road Vehicles

1180. Public Concern: The Forest Service should allow off-road vehicle use in roadless areas.

BECAUSE BOTH USER CONFLICTS AND ENVIRONMENTAL DAMAGE ARE MINIMAL

User conflicts seem to be the major issue facing all of the recreational uses. I hope that the roadless initiative will not ban OHV/ORV use in these areas. I feel that the conflicts are minimal as well as the environmental damage. Local clubs and groups can correct this damage. I feel that the wilderness groups are extreme in their demand that public lands should exclude everyone but backpackers. The philosophy of OHV groups and wilderness groups are mutually exclusive. The myth of a wilderness paradise where man lives in harmony with nature is a strong theme in wilderness groups. Such a state never existed, nature is cruel, hard and we don't do to well on our own in nature. Thanks to technology we do not freeze in the dark with a bacterial infection. I too am conflicted.

On the one hand I want to conserve the natural beauty of our forestlands and on the other I want to enjoy the recreational activities, somehow a balance can be achieved. (Individual, Denver, CO - #A841.91211)

Many activities are viewed as dangerous to the land, yet are not. It seems people believe words over reality. Reality is that OHVs, like trail motorcycles and mountain bikes do little if any damage to the land, yet we like to BELIEVE they do. Again visiting the land in question is the only way to view what is REALLY going on. (Individual, Humboldt, TN - #A464.90000)

ALLOW OFF-ROAD VEHICLES NOT LICENSED FOR THE STREET

Allow use of specific roads for OHVs that are not licensed for the street in order to develop a system that ties OHV trails together. (Organization, Helena, MT - #A13226.91211)

IN CALIFORNIA

I hope and plead that you will keep access the same as it has been in the past. I live in California and hope off-road access will remain available in areas like Pismo Beach and Gorman and be reopened in other available areas while access in areas like Yosemite shall remain by foot and horseback. (Individual, Santa Barbara, CA - #A21204.90100)

Do Not Allow/Restrict Off-Road Vehicles

1181. Public Concern: The Forest Service should restrict off-road vehicle use.

BY REQUIRING OFF-ROAD VEHICLE USERS TO HAVE PERMITS

I love the forests and as an off road biker and 4-wheeler I respect the environment. By taking my kids deep into the forests I am able to teach them a loving respect for nature as well. If the public is denied easy access to the wilderness then less of our next generation will know why we want to protect the forest. Rather than close the forests roads, require permits to access these areas like hunting, which requires a training session on respect for the land and a visible number to identify the unlawful. It is a few who have disrespect who are ruining it for thousands. The forest service needs to do a better job of patrolling areas to keep the big wheeler mud rukkers from tearing up roads and wetlands. (Individual, No Address - #A296.90000)

Any activities which are in keeping with the goals of preservation should be permitted. ORV/OHV use may be compatible in some circumstances, but motorized vehicles should be permitted only where access is specifically granted. (Individual, Denton, TX - #A156.90110)

1182. Public Concern: The Forest Service should prohibit off-road vehicles in inventoried roadless areas.

I believe the existing Roadless Area Conservation Rule (regardless of the legally flawed decision of Judge Lodge's ruling) should be selected and implemented, with one change. I believe that, due to the damage caused by off-highway vehicles to soil, vegetation, water quality, wildlife, and solitude, that they should be banned from ALL inventoried roadless areas. (Individual, Idaho Falls, ID - #A11733.10150)

IN THE SHAWNEE NATIONAL FOREST

No off-road vehicles . . . in Shawnee National Forest. (Individual, Glencoe, IL - #A21487.90110)

Motorized Recreation – Snowmobiles

Summary

Adequacy of Analysis – One individual suggests the Forest Service could better manage winter motorized recreation by more adequately evaluating the number of user days for snowmobiling.

Snowmobiles – Of those who specifically address snowmobiling, most say the activity should be allowed in roadless areas. One individual remarks that snowmobiling is his passion and is concerned that they are seeing more and more areas closed off to this sport. Several respondents add that they do not cause damage to the soil, create trails and their tracks melt away. They do not see an adverse impact to the environment. Others do not believe that the Forest Service should not allow snowmobiles in roadless areas. These respondents feel that air and noise pollution ruin their backcountry experience.

Adequacy of Analysis

1183. Public Concern: The Forest Service should reevaluate the number of user days for snowmobiling.

IN WISCONSIN

Note that both US Forests in Wisconsin are in the snow-belt and have had 60+ to 100 days of excellent snow trail conditions over the past 30 years. The Southern end of Wisconsin has few snow-trail user days. I do feel that the US Forest Service in Wisconsin does a marginal job at counting/measuring user days for snowmobiling family recreation. Snowmobilers want to keep the trails that exist today, however USFS documentation on winter snowmobiling use is weak and misleading.

I have personally ridden all the Wisconsin winter snowmobile trails in Jan and Feb 2001 that are currently within the USFS roadless inventoried lands. These trails tend to connect smaller communities via remote forest winter trails that have considerable use, especially on three-day weekends. (Individual, Thiensville, WI - #A28617.91213)

Allow Snowmobiles

1184. Public Concern: The Forest Service should allow snowmobiles in roadless areas.

Change MAs 11 and 12 to allow snowmobiling to continue in areas where it already is. Snowmobiles should not be kicked out of an area just because it is considered a roadless area. Motorized recreation should continue in these areas. (Individual, Superior, MT - #A3723.91211)

As a SNOWMOBILE rider, I do resent the fact that those "spandex lovers" are working very hard to make snowmobiles extinct. We spend $9.4 billion every year for our sport . . . cross country skiers are CHEAP . . . I have actually been asked to give them HOT WATER so they can make tea while they sit in the cafe and drink it without buying even a doughnut! Snowmobiles have the LEAST IMPACT ON THE GROUND of all motorized vehicles . . . we watch bobcats and birds and rabbits every time we go out for a ride . . . they don't even care if we are there! They are too busy doing their own survival thing. (Individual, Mazama, WA - #A757.91213)

I am writing this because my father just informed me that the lawmakers are meeting again to discuss whether or not to make more laws restricting our wilderness area. I am strongly opposed to this. I am 27 years old and have snowmobiled with my father for more than 20 years now. We live in California. Snowmobiling is my passion, it is my escape from the world. My father has always raised me to be kind and responsible with nature, not to be foolish. In the last few years we have seen some of our favorite places to visit be deemed 'off-limits.' I don't understand why . . . . We never hurt anything. Our snowmobiles never even touch the soil.

I think that the government has done more than enough to restrict the much sought after nature destinations that people like me deserve to experience. (Individual, Hayward, CA - #A5339.91213)

BECAUSE THEY DO NOT CREATE ROADS AND TRAILS AND THEIR TRACKS MELT AWAY IN THE SPRING

Snowmobiles have been the bugaboo of environmentalists in the Greater Yellowstone region for the past few years, but I believe the controversy is merely a question of management. Roadless areas should be open to a wide array of recreation users - including hikers, mountain bikers, horseback riders, llama outfitters, skiers, and, yes, snowmobilers. Over-the-snow vehicles do not create roads and trails; their tracks melt away in the spring. (Individual, West Yellowstone, MT - #A1045.90100)

IN THE HIAWATHA NATIONAL FOREST

I spend a lot of time in Hiawatha National Forest and I can tell you we are not hurting the environment with the current status.

Hiawatha National Forest is extremely important to my livelihood. My wife and I own a small resort on the edge of the forest. The forest allows people to come to our area 2 months a year for the various recreational activities. Spring, summer, and fall require automobile traffic on the forest roads. Winter time traffic consists of snowmobile traffic. Snowmobiling has allowed Michigan's Upper Peninsula to become a true winter wonderland. We actually need to open more seasonal roads for groomed snowmobile trails. The safety of snowmobilers rests in developing additional groomed trails. Additional trails do not require additional roads, just grooming more existing forest roads. (Individual, Christmas, MI - #A6694.45611)

Do Not Allow/Restrict Snowmobiles

1185. Public Concern: The Forest Service should not allow snowmobiles in roadless areas.

Last winter I attempted to enjoy a nice winter camping trip in the Snoqualmie-Mt. Baker NF and was treated to an endless procession of snowmobiles. What enabled us to get away form the carbon monoxide and hellish roar of horribly inefficient 2-stroke engines? Skiing far off of the National Forest roads. (Individual, Redwood City, CA - #A1221.91221)

Non-Motorized Recreation

Summary

General Comments – According to some respondents, the Forest Service should acknowledge that there is very little demand for non-motorized recreation opportunities. One Organization states, "The opportunity to provide for the nation's pedestrian recreation—how much of a need is

there vs. how much of an opportunity already exists; i.e. Designated Wilderness Areas managed by the U.S. Forest Service comprise 18% of the total National Forest System. However, only 4.25% of all forest visitors access Wilderness areas for their recreational pleasures. Based upon agency statistics it would appear as if the need for pedestrian recreation opportunities is low." A county commissioner adds that, according to recent studies, "road usage is the predominate recreational use, and even wilderness use is limited to those areas close to roads."

Non-Motorized Recreation – Some individuals state that the Forest Service should allow non-motorized activities in roadless areas. One respondent remarks, "Any non-motorized activity should be allowed in roadless areas, as it is hard to imagine an activity of this sort that would be very harmful." Another person suggests that the Roadless Area Conservation Rule would discourage hiking, and so should not be implemented.

On the other hand, one individual suggests that jogging be prohibited in roadless areas. Another person writes, "Whereas there are great quantities of public lands currently closed to motorized recreation and these lands are severely under-utilized because of lack of non-motorized recreationists, I hereby propose that there is a freeze imposed on any new classification of non-motorized public lands."

Non-motorized Recreation General

1186. Public Concern: The Forest Service should acknowledge that the need for non-motorized recreation opportunities is low.

The opportunity to provide for the nation's pedestrian recreation—how much of a need is there vs. how much of an opportunity already exists; i.e. Designated Wilderness Areas managed by the U.S. Forest Service comprise 18% of the total National Forest System. However, only 4.25% of all forest visitors access Wilderness areas for their recreational pleasures. Based upon agency statistics it would appear as if the need for pedestrian recreation opportunities is low. (Organization, Basalt, CO - #A10621.45100)

NON-MOTORIZED RECREATION DOES NOT DEPEND ON LARGE UNROADED AREAS

It is important that when examining the roadless issue, that the facts be closely analyzed. For example a clear misconception is that roadless demand is increasing, when in fact there is not only no scientific support for this position, but the scientific data available indicates just the opposite.

While the DEIS (3-120) noted that:

"Recreation use data has never been collected specifically for inventoried roadless and other unroaded areas. As a result, estimates of environmental consequences based on use cannot be made with any degree of precision."

A review of the Forest Service's own research reveals . . . numerous reports on the recreational use of the roadless areas. Most notable are the recent monitoring reports and studies of unroaded recreation usage that indicate that the recreation use of the unroaded areas is not dependent upon large areas of unroaded lands. Rather, these recent studies indicate that road usage is the predominate recreational use, and even wilderness use is limited to those areas close to roads. (Elected Official, Roseburg, OR - #A11811.45100)

Allow Non-motorized Recreation

1187. Public Concern: The Forest Service should allow non-motorized activities in roadless areas.

Any non-motorized activity should be allowed in roadless areas, as it is hard to imagine an activity of this sort that would be very harmful. Other activities should be examined individually to determine their affect with respect to the goal of the roadless area. (Individual, Tucson, AZ - #A4938.90413)

1188. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.

BECAUSE IT WILL DISCOURAGE HIKING

This roadless rule will do more harm than good. Many laws like it have been twisted and manipulated therefore working against what it is to protect. I think that this will make hiking more restricted considering there have been people arrested and charged for picking up rocks they were charged with "removing archaeological resources" from Lake Oroville CA. This case was dismissed but many are not. The roadless rule will inevitably make hiking a thing of the past along with other activities that the every day person enjoys. I don't like the fact that even now I could be arrested for picking up rocks or finding a coin on the ground. I would like to request that the roadless rule not be put in effect. (Individual, No Address - #A7149.10130)

1189. Public Concern: The Forest Service should allow non-motorized, backcountry recreation.

FOR INDIVIDUALS AND GROUPS OF LESS THAN 12 PEOPLE

Activities that should be allowed are non-motorized, backcountry recreation for individuals and small groups (less than 12 people). (Individual, Waterbury, VT - #A15433.90100)

Do Not Allow/Restrict Non-motorized Recreation

1190. Public Concern: The Forest Service should prohibit non-motorized recreation in roadless areas.

JOGGING

No . . . jogging . . . or other activity that could fragment these last stretches of unbroken forests, disturb their inhabitants, or weaken their capacity to support diverse wildlife. (Individual, Olympia, WA - #A16987.90110)

1191. Public Concern: The Forest Service should impose a freeze on any new classification of public land as non-motorized.

BECAUSE LARGE AREAS OF PUBLIC LAND CURRENTLY CLOSED TO MOTORIZED RECREATION ARE SEVERELY UNDERUSED

Whereas, there are great quantities of public lands currently closed to motorized recreation and these lands are severely under-utilized because of lack of non-motorized recreationists, I hereby propose that there is a freeze imposed on any new classification of non-motorized public lands. (Individual, Clancy, MT - #A6721.45500)

Mechanized Recreation

Summary

A number of mountain bikers state that mechanized recreation should be allowed in roadless areas because, they maintain, the sport is growing in popularity does not interfere with pedestrian recreationists. One person who claims not to be a fan of mountain biking acknowledges that "in general they do not require roads, are quieter, and you can't penetrate a wilderness nearly so far on a bicycle as on a machine, and you can't haul nearly so much litter with you." Others, however, assert that mountain biking can damage the environment and so "should be prevented in erosion-prone areas."

Allow Mechanized Recreation

1192. Public Concern: The Forest Service should allow mountain biking in roadless areas.

Mountain bikes should be allowed in any and all roadless areas. I ride a great deal and seldom see a hiker any great distance from the parking lot. On days when I do trails work I rarely see a hiker but see lots of mountain bikers. (Individual, Crestline, CA - #A123.91210)

I think a special exception should be made for non-motorized travel, specifically MOUNTAN BIKING, but also including horses and hikers etc. This land is our heritage we should be allowed to have access to it. And what better way than to ride a bike to see it? It is non-polluting and easy on the land. (Individual, No Address - #A850.91210)

I'm an avid mountain biker. I also am a member of an outdoor club. (The Warriors Society), that has hikers as well as mountain bikers included in the membership. The Warriors Society does almost all the trail maintenance in the Trabuco district of the Cleveland national Forest. I am most concerned that "Roadless" is a prelude to excluding mountain bikers from using OUR wild areas. It has been drawn to my attention that Mountain Biking is constantly under fire from all sides. The only people that want it excluded are the ones who have never participated in the sport and therefore see no need for it.

What is going to be an allowable activity in the "roadless areas." If roadless means that two years after passage, the Government or other influence is going to ban Mountain biking I'm very much against "Roadless." Taking the Government's word that they will never turn this into a ban is NOT an option, so you can put me down as against "Roadless." (Individual, Anaheim, CA - #A337.91214)

I am no fan of mountain bikes, but in general they [do not] require roads, are quieter, and you can't penetrate a wilderness nearly so far on a bicycle as on a machine, and you can't haul nearly so much litter with you. (Individual, No Address - #A470.91214)

IN THE CLEVELAND NATIONAL FOREST

I am very much personally concerned with any changes that affect trail access to the Santa Ana Mountains. I am a frequent trail user and ardent environmental conservationist. I served for five years as a Park Ranger Reserve for Orange County, a volunteer position. I am also an avid mountain biker and choose that as my primary means to access the Santa Ana Mountains. Those who mountain bike in this area are among the most responsible trail users, generally doing more to maintain trails and wilderness than to harm it. We tend to be the more experienced and older mountain bikes. (I am 47 years old).

I urge that any changes made to designations in the Cleveland National Forest specifically permit mountain biking on all multi-purpose trails. I would support any efforts made to ban road building or any access of motorized vehicles where they are not currently permitted. (I am also a motorcyclist, but have no desire to expand access beyond what is currently available. (Individual, Trabuco Canyon, CA - #A26030.91214)

Do Not Allow/Restrict Mechanized Recreation

1193. Public Concern: The Forest Service should restrict mountain biking.

IN EROSION-PRONE AREAS

Mountain biking should be prevented in erosion-prone areas. (Individual, Chapel Hill, NC - #A8742.90110)

Local forester input would be very useful on this subject, prohibitions should be established that would best protect depending on the potential risk of damage to a particular area, i.e. no fishing in endangered

species areas, fire bans in dry areas, no bikes in erosion prone areas, etc. (Individual, No Address - #A8998.90000)

Ski Area Development

Summary

General Comments – General comments on ski area development are somewhat varied. One Permit Holder recommends that the Forest Service employ a panel advisory committee to review ski area requests for expansion. Another remarks that "the Forest Service has already decided that ski area operations are consistent with roadless area protection and management," and suggests that the Agency should use explicit language in its documents to clarify its position. One respondent requests that the Forest Service specifically address ski ways, ski runs, and ski trails and the use of snowcats or other off-highway vehicles in inventoried roadless areas adjacent to ski areas. Some comment on the potential effects of a national roadless rule and request that the Agency not implement any rule that would alter current ski area special use permit rights. Finally, one respondent requests that alpine skiing be allowed in roadless areas adjacent to existing ski areas.

Ski Area Development – A number of respondent who specifically address ski area expansion, assert that it should be allowed. These respondents state that there is a growing demand for outdoor recreation and that ski area operations can be compatible with roadless protection. According to one business, "Resorts that obtain approval should be able to make improvements outside of permitted boundaries if no road construction is needed or if roads already exist in roaded portions of IRAs." Respondents also list a number of specific areas where they say ski area expansion should be allowed.

Other respondents state that the Forest Service should not allow ski area expansion outside of current ski area permit boundaries. One respondent concludes, "Skiing is not an activity that has increased in number in the past years and I believe the number of resorts now available for this purpose is quite adequate." Others suggest that the Forest Service should review ski use permits and manage such areas in a more restrictive manner.

Ski Area Development General

1194. Public Concern: The Forest Service should review ski area requests for expansion.

WITH A PANEL ADVISORY COMMITTEE

In order to maintain economic vitality, which in turn fosters good stewardship in the forests, we must not neglect the resorts' ability to seek additional opportunity. This opportunity could come in many forms—improving facilities in the existing permit area, allowing for the careful expansion into areas adjacent to the existing permit area, as well as reviewing the possibility for additional terrain being added which may bear the IRA roaded construction/maintenance allowed classification. All of these potential uses would require the careful review of the Forest Supervisor as well as the District Ranger to ensure the compatibility with the environmental considerations. Again, I would propose a review that took on a panel advisory committee's recommendations as further evidence of a complete and thorough review process. (Business, Twin Bridges, CA - #A8808.90810)

1195. Public Concern: The Forest Service should use specific language to clarify its position on ski area operations.

The Forest Service has already decided that ski area operations are consistent with roadless area protection and management. However, this conclusion is founded upon inquiries with knowledgeable agency personnel and a close reading of the final rule, the preamble, and other agency documents. Instead, explicit language is essential to clarify Forest Service intent. (Permit Holder, Avon, CO - #A28852.10120)

1196. Public Concern: The Forest Service should address ski ways, ski runs, and ski trails and the use of snowcats or other off-highway vehicles in inventoried roadless areas adjacent to ski areas.

Forest Service Roadless Area Conservation Final Rule Questions and Answers at 10. The preamble to the Final Rule also stated that timber cutting and removal would be allowed for "authorized activities such as ski runs and utility corridors." 66 Fed. Reg. 9, p. 3,258. Nor are ski runs, ski trails, and ski ways at four-season resorts considered "roads" under the Final Rules. The Final Rule would narrowly prohibit road construction and reconstruction; it carefully defines "roads" as a "motor vehicle travelway over 50 inches wide, unless designated and managed as a trail." Final Rule [section] 294.11. Ski runs, ski trails, and ski ways appear to be exempt "trails.'' And nothing in the Final Rule was intended to affect the use of snowcats, snowmobiles, or other off-highway vehicles in inventoried roadless areas adjacent to ski areas.

A representative of Vail Resorts spoke by telephone on December 1 and 8, 2000 with [the] Project Director of the Forest Service Roadless Project [who] confirmed that: ski ways, ski runs, and ski trails do not constitute roads under the proposed rules; the construction and use of ski ways, ski runs, and ski trails in inventoried roadless areas would not be affected by the proposed rules; and the proposed rules do not affect the use of snowcats or other off-highway vehicles in inventoried roadless areas adjacent to ski areas. (Permit Holder, Avon, CO - #A28852.45200)

1197. Public Concern: The Forest Service should not implement a national roadless rule that would alter current ski area special use permit rights.

The SUPs held by MMSA are in essence agreements or contracts between MMSA and the Forest Service. The issuance, making, and entering into of SUPs are a product of, and are consistent with, the Forest Plan then in effect (identified herein as the Plan), and the management prescriptions contained therein. This entire process is being circumvented, and the rights vested in special use permittees such as MMSA are being affected and obviated in the event the Roadless Initiative is adopted. (Permit Holder, Mammoth Lakes, CA - #A21901.75320)

1198. Public Concern: The Forest Service should allow alpine skiing in roadless areas adjacent to existing ski areas.

If roadless area designations are to be applied to parcels of land that are adjacent to existing ski areas or permit boundaries, the applicable Forest Plan should not expressly prohibit use of the area for alpine skiing for those parcels. (Permit Holder, Stateline, NV - #A21708.91213)

Allow Ski Area Development

1199. Public Concern: The Forest Service should permit ski area expansion.

Please open up more roads, so we can go on scenic drives into the forest. Also, allow some ski areas to expand their skiing terrain. (Individual, Bozeman, MT - #A1511.90100)

It is the ski industry's view that parcels adjacent to existing developed recreation sites should not be designated "roadless", as they may have some, but not all, of the characteristics commonly associated with roadless areas. If such adjacent parcels are designated as roadless, forest planning guidance or

directives should clarify that for planning purposes, it should be assumed that ski area operations can be compatible with roadless management. Even the agency's Final Environmental Impact Statement (FEIS) in Roadless Area Conservation, issued in November, 2000, acknowledged that "new ski areas, or expansion of existing ski areas outside existing special permit boundaries, in inventoried roadless areas may not be subject to the prohibitions, it would depend on the type of project and method of construction." FEIS Volume 3, Response to Comments, Page 115. Ski area operations can be compatible with roadless protection and should not be expressly prohibited. (Permit Holder, No Address - #A5285.90810)

The agency should recognize the unique role of ski areas in its decision-making on roadless protection. Resorts need flexibility is particularly necessary in the context of roadless protection and is justified on many levels: (1) we currently accommodate over 30 million skier visits on less than one-tenth of one percent of NFS lands; (2) Recreation visits on the national forests are expected to increase in the future as a result of demographic and population shifts, and as quality of life becomes a high priority for the public. Ski areas experienced a record season in 2000/2001 with over 57.3 million skier visits; (3) In addition to increased quantitative demands for recreation, there is now increased public demand for diversified and year-round recreational activities at ski resorts, as well as new and varied terrain, better and faster circulation, and reliable and consistent snow conditions. Ski areas must have the flexibility to make improvements to address these emerging trends. (4) By necessity, resort improvements must be adjacent to or connected to existing improvements. Ski areas make significant, long-term capital investments on National Forest land, and are locked in place by virtue of these investments. We do not deal in interchangeable commodities that can be obtained elsewhere on the forest. (5) Ski area roads are essential to the completion of ski area improvement and development projects, as there is no practical or economically feasible substitute for road building in the context of ski area development. (6) When we do construct roads in new areas, their impacts are limited as thorough analysis is conducted, mitigation is performed, the roads are short in length, and they are used for limited or temporary purposes such as construction, maintenance or service, access or emergencies. 7) Finally, resorts are uniquely situated in that we help enhance the public's appreciation for the natural environment and the very values that the agency seeks to protect through roadless management. All of these factors should be taken into account in the agency's analysis of the future course of roadless protection. (Permit Holder, No Address - #A5285.90910)

DUE TO GROWING DEMAND FOR OUTDOOR RECREATION

Nationally, ski area operators accommodate more than 30 million forest visits on less than one-tenth of one percent of the total inventory of NFS lands. U.S. ski areas had a record season in 2000/2001 with over 57.3 million skier visits—both public and private lands. Recreation visits on the national forests are expected to grow as a result of demographic and population shifts, and as quality of life continues to be a high priority for the public. Nationally, ski area capacity will need to expand to accommodate the growing demand for outdoor recreation.

It is important to remember that land suitable for the development of alpine ski and snowboard terrain is limited. Topography, slope gradient requirements, solar and wind exposure, avalanche hazard, fish and wildlife habitat requirements, cultural resources, and vehicular access are just a few of the myriad issues that constrain the suitability of lands for ski area development. As a consequence, ski area operators of the Pacific Northwest support the development of appropriately suited terrain that is contiguous to existing ski areas. Relying upon the USFS policy that gives existing SUP holders the opportunity to expand their operations to meet increasing public need—rather than the conversion of raw land for the development of new ski areas—Pacific Northwest ski area operators have invested hundreds of millions of dollars into existing ski area facilities. Operators have done so with the goal of remaining competitive in local and regional ski markets—both in the short- and long-term. (Permit Holder, Hood River, OR - #A13230.90810)

BECAUSE SKI AREA OPERATIONS CAN BE COMPATIBLE WITH ROADLESS PROTECTION

It is the ski industry's view that parcels adjacent to existing developed recreation sites should not be designated "roadless,' as they may have some, but not all, of the characteristics commonly associated with roadless areas. If such adjacent parcels are designated as roadless, forest planning guidance or

directives should clarify that for planning purposes, it should be assumed that ski area operations could be compatible with roadless management. Even the agency's Final Environmental Impact Statement (FEIS) on Roadless Area Conservation, issued in November 2000, acknowledged that "new ski areas, or expansions of existing ski areas outside existing special use permit boundaries, in inventoried roadless areas may or may not be subject to the prohibitions; it would depend on the type of project and method of construction." (FEIS Volume 3, Response to Comments, Page 115) Ski area operations can be compatible with roadless protection and should not be expressly prohibited. (Permit Holder, Hood River, OR - #A13230.90810)

The right to enjoy one's own property within a Roadless designation area must be preserved. Going beyond that, even if property is not currently owned by an individual, the access to that land must be made available to the public for their use. The Forest Supervisor and District Ranger must be given the ability to review proposals which may allow public use of areas marked for IRA with potential new road construction. You must incorporate into the Roadless document that if potential use of the land is not outside of acceptable environmental concerns, then the land shall be given the opportunity to further enhance the benefit to the general public. A case in point could be the ability for a resort such as ours to utilize such land to improve the public's interaction with the environment. As is mentioned in the Forest Service FEIS on Roadless Area Conservation, "**New ski areas, or the expansions of existing ski areas outside existing special use permit boundaries, in inventoried roadless area may or may not be subject to the prohibitions; it would depend on the type of project and method of construction**." In essence, ski area operations can be compatible with roadless protection thus enabling improved access to public land. (Business, Twin Bridges, CA - #A8808.40000)

EXPANSIONS THAT DO NOT REQUIRE ROAD CONSTRUCTION

Another point that needs clarification is the expansion of resorts and recreation facilities outside of special use permit boundaries and into IRAs. While the proposed rule deals with the construction and reconstruction of roads in the IRAs, it leads one to believe that expansion and construction not requiring roads will be prohibited. This should simply not be the case. Resorts that obtain approval should be able to make improvements outside of permitted boundaries if no road construction is needed or if roads already exist in roaded portions of IRAs. The proposed rule should be modified to clearly state that the policy pertains only to road construction or reconstruction and that ski area expansion outside of permit boundaries into IRAs could be authorized if there is no road construction needed. (Business, Mammoth Lakes, CA - #A30296.90810)

1200. Public Concern: The Forest Service should permit ski area expansion in certain areas.

IN THE EASTERN SIERRA

The FEIS states that the opportunities for future developed recreation would decline if the preferred alternative is selected. There is some discussion that additional impacts will occur at existing developed and road dependent recreation facilities, but there is no disclosure as to what the impacts will be, how the Forest Service plans to deal with increased use at existing facilities, what type of expansions of existing facilities will be authorized, and so on. This is of particular interest to DCC, since the FEIS states that no additional expansion of ski areas shall be allowed outside of existing permitted boundaries. In the case of the Eastern Sierra, communities have been developing in anticipation of Forest Plan decisions being enacted. As stated in the FEIS, demand is increasing for dispersed activities, but it is also increasing for developed and road dependent recreation. If there is no opportunity for expansion of facilities, the opportunity to manage developed recreation sites will diminish. The INF planning process took this future-planning element into consideration and provided the flexibility that was needed. (Business, Mammoth Lakes, CA - #A30296.90100)

IN THE GRANITE MOUNTAIN/SLAB BUTTE AREA OF THE PAYETTE NATIONAL FOREST

It has long been our position that a tract of land on the Payette N.F. needs to be recognized as having potential for ski area development. We would like to take this opportunity to again suggest that a portion

of the Granite Mountain/Slab Butte area be recognized in the forest plan for this purpose. Ski area operations can be compatible with roadless protection. (Permit Holder, McCall, ID - #A15317.91210)

PELICAN BUTTE

This is difficult for me to assess. I have mainly become familiar with the issues surrounding Pelican Butte, and in accordance with the vast majority of citizens from this county, I believe that there is likely to be little environmental impact on Pelican Butte or the surrounding areas with the proposed development of Pelican Butte into a ski-destination. (Individual, Klamath Falls, OR - #A6931.50000)

In my opinion, the Jeld-Wen corporation's proposal to develop the most environmentally conscientious ski-destination in the history of skiing in the U.S. on Pelican Butte is NOT a major imposition on the wilderness as it only represents 1/10,000th or 0.01% of the total Clinton "Roadless ban." Furthermore, it has been estimated by some biologists that such a development would actually enhance wildlife in the area of Pelican Butte, particularly elk and deer that rely on open meadows for higher quality food. (Individual, Klamath Falls, OR - #A6931.53200)

In a prospective fashion, the Jeld-Wen Corporation, with whom I do not have any financial interest, has already drawn up a very elaborate plan to develop Pelican Butte into the most environmentally conscientious ski-destination in the country. This has been with the input of wildlife biologists, the Forest Service, local citizens, local Indian tribes, and ski-consultants. This has included proposals for underground passage-ways for animals to cross ski-runs, a high gondola which passes over rather than through old-growth forest, the avoidance of ski runs in old growth forest, minimal snow-making near the base of the hill, withholding from ANY hotel development at the base of the hill, and implementing a small sewage treatment plant specifically for the day lodges on the hill in order to prevent any water contamination issues. The net result is that Jeld-Wen has spent up to $4,000,000 simply developing an environmental impact statement and proposing a plan for the development of Pelican Butte. While some radical environmentalists may contend that there can be no compromise concerning Pelican Butte, we must remember that the ski-destination proposal only includes 3000 acres that only represents 1/10,000th of the "Roadless ban" area. (Individual, Klamath Falls, OR - #A6931.90810)

SIPAPU

An Executive Order on the Roadless Initiative will:

1. Overturn the Public Law 96-550 enacted by the 96th Congress December 1980.

2. Be contrary to the 1986 Carson National Forest Plan concerning Sipapu Ski area.

3. Negate 15 years of work and expense by the Forest Service and Sipapu in developing an EIS for ski area expansion.

4. Be an environmental injustice by creating economic and social hardships on the poorest countries in northern New Mexico.

5. Circumvent the right for appeal.

Public Law 96-550 enacted by the 96th Congress December 1980.

The purpose of the act is very specific with its main points:

1. Designate certain National Forest lands to be included in the National Wilderness Preservation System.

2. Insure certain uses including but not limited to campground and other recreation site development, timber harvesting, intensive range management, mineral development and watershed and vegetation manipulation.

3. Designate certain other National forest system land in NM for further study in furtherance of the purpose of the Wilderness Act.

The land surrounding the ski area was not included as wilderness lands, not included for further study and was included in other lands promptly available for nonwilderness uses.

The EIS for the Carson National Forest Plan, completed in 1986, is in accordance with Public Law 96-550 and designated management area 15 for ski area expansion. (Permit Holder, Vadito, NM - #A28970.45624)

Do Not Allow/Restrict Ski Area Development

1201. Public Concern: The Forest Service should not allow ski area expansion.

I live in Ogden, Utah, and frequently visit the Wasatch-Cache National Forest, with which I know you are familiar. The Ogden Ranger District contains much developed area (Pineview Reservoir, Snowbasin Ski Area), much undeveloped roaded area (Monte Cristo Plateau), and still a fair amount of inventoried roadless area. I am sad to remind you, however, that the nearest roadless area to central Ogden was recently encroached upon by the expansion of Snowbasin into Strawberry Bowl, an expansion that was fraudulently claimed to be necessary for the 2002 Olympics.

Let me repeat: The most recent encroachment into a roadless area near here was made not for the purpose of fire prevention, . . . and not even for the purpose of resource extraction. It was made for the purpose of commercial profit by one of the wealthiest men in Utah, who is attempting to capture a greater share of the nation's stagnating downhill skiing market. He was supported in this attempt by many local elected leaders, who felt that bringing more tourists to Utah might help the local economy. Obviously these local leaders are unconcerned with the fact that an increase in tourism here might lead to a decrease in tourism somewhere else. Meanwhile, polls showed that Ogden's about half in favor of the Snowbasin resort development and half against.

Now another local ski area, Nordic Valley, is proposing to expand onto 2000 acres of inventoried National Forest roadless area.

It is in situations like this that we need to rise above local interests and take a national perspective. The national interest is not served by ski area expansions that merely try to attract tourists to a particular ski area at the expense of others. Also, ski area expansions on public land come at the expense of the American taxpayer, who pay the salaries of the many Forest Service employees who work full time to monitor ski area activities and try to mitigate their environmental damage. And the environmental damage that does occur exacts a price on us all, as watersheds are polluted and more plant and animal species become endangered throughout the United States. (Individual, Ogden, UT - #A30511.15122)

OUTSIDE OF CURRENT SKI AREA PERMIT BOUNDARIES

The Roadless Policy allows ski areas to expand (many significantly) within ski area permit boundaries - only expansions outside of these areas would be curtailed. With skier numbers essentially stagnant for three decades, it makes little sense to permit further expansions into these undisturbed areas, such as at Beaver Creek, Breckenridge and Vail in Colorado, Mammoth Mountain and Heavenly in California, and Snowbird and Snowbasin ski areas in Utah. (Individual, Alta, WY - #A19643.90820)

BECAUSE THERE IS NO NEED FOR EXPANSION

Skiing is not an activity that has increased in number in the past years and I believe the numbers of resorts now available for this purpose is quite adequate. There is no need for expansion. (Individual, Lake Oswego, OR - #A4615.90820)

1202. Public Concern: The Forest Service should not allow ski area expansion in certain areas.

IN CALIFORNIA

Ski area developments should also be banned from roadless areas, such as Sherwin and Mammoth/June Lakes in my home state of California. These developments also degrade the health and beauty of the environment while using the claim of "meeting recreational demand" to hide the real goal of attracting lucrative real estate investments. New ski area construction or expansion should not be given any special exemptions in your final policy. (Individual, Auburn, CA - #A30708.90820)

1203. Public Concern: The Forest Service should review ski use permits and manage such areas in a more restrictive manner.

I want ski resort use permits to be carefully reviewed and managed in a MORE RESTRICTIVE fashion. (Individual, Salt Lake City, UT - #A4902.90110)

The Forest Service has recently expanded the use permits for the Snowbird Resort to add facilities, roads, ski lifts, and other development on a previously roadless area to the south of their previously existing ski runs. This permit and agreement is in place. However, the Forest Service officials here in the Wasatch National Forest can and should take a MUCH HARDER LINE with this development. No further activity on my public land should be allowed until the local Forest Service Administrators completely review all the existing terms and conditions for compliance. (Individual, Salt Lake City, UT - #A4902.90820)

Hunting and Fishing

Summary

General Comments – Some assert that among the values to be considered during roadless area evaluations, hunting and fishing values should be included. Beyond that, most general comments on this topic address management activities which respondents say will enhance hunting and fishing. Several respondents request that the Forest Service protect roadless areas, both to maintain game species habitat and to prevent hunting behavior problems associated with motorized access. One organization states that, according to a study on the topic, "The use of motor vehicles associated with hunting rose to the top of the bad behavior analysis." Others assert simply that hunting is better in roadless areas. One individual remarks, "Designated roadless areas and other areas with low densities of roads are often attractive to big game for the security they offer and thus make for the best areas to hunt."

Some believe that the Forest Service should not decommission existing roads because, they say, roaded access is needed for hunting. One individual adds, "I am an outdoorsman and I use the National Forests a lot. It has become very difficult to hunt in many of our forests as it is. A large animal, such as an Elk, is impossible to get out of the woods on foot in many areas." Likewise, others urge the Forest Service to allow timber removal for habitat management in order to maintain quality hunting and fishing. Finally, one individual suggests that hunting and fishing licenses ought to be issued by the federal government, rather than individual states, to ensure consistency.

Funding – A few individuals assert that the Forest Service should use the fees collected from hunters and anglers to benefit hunters and anglers. One person remarks, "Please respect the fact that hunters and anglers pay money to manage our wildlife and it should benefit them the most."

Hunting and Fishing – A number of respondents who address hunting and fishing, say it should be allowed in roadless areas. Several ask the Forest Service to keep the "heritage and traditions" associated with hunting and fishing "alive and well for years to come." Some suggest these activities should be allowed because people depend on the food they obtain from hunting. One person suggests retaining free access for these activities. Others mention specific types of hunting and fishing they say should be allowed to see continue, including mountain lion hunting, commercial fishing, trapping, and sport shooting.

Other respondents believe that the Forest Service should prohibit hunting in roadless areas. "Hunters kill wildlife," asserts one individual. "This is not conducive to areas functioning as

biological strongholds and wildlife refuges." Another says, "Bear baiting should not be allowed anywhere, period."

Some respondents direct their comments specifically to trapping. One individual states, "I would be in favor of having [roadless areas] remain open for all legal purposes, including hunting, fishing, and trapping." Others who address trapping assert that it is not well regulated and restrictions are poorly enforced. According to one individual, "It is not uncommon in states with regulations and in states with none, for an animal to be left in a trap for weeks because the trapper does not check the trap." Others concur that trapping is not effective for wildlife management as "it does not ensure stable, healthy wildlife populations." Rather, "natural ecological factors such as weather and food supply, as well as wild animals' innate ability to limit their populations through natural means, are sufficient to create a balance between wildlife populations and their habitats." Some also suggest that hunting with dogs be prohibited because, they say, the dogs are not adequately kept under control.

A few individuals suggest that the Forest Service regulate hunting, particular hunting that damages predator-prey dynamics. One suggestion is to regulate the number of tags sold. Some also suggest closing off-road vehicle trails to hunters and prohibiting fishing in roadless areas containing endangered species.

Hunting and Fishing General

1204. Public Concern: The Forest Service should consider hunting and fishing values.

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. (Individual, No Address - #A4553.54100)

1205. Public Concern: The Forest Service should require that hunting and fishing licenses be issued by the federal government.

I think that hunting and fishing licenses should be federal and not state and the same for everyone, like federal parks. (Individual, Danbury, WI - #A7242.91310)

1206. Public Concern: The Forest Service should protect roadless areas.

FOR GAME SPECIES HABITAT

Roadless areas are crucial to protect habitat security and maintain ample hunting opportunity for elk, deer, bighorn sheep, mountain goats and other game.

Loss of roadless areas would cause Montana's five-week elk season to collapse, as it did on Idaho's Targhee National Forest, where elk seasons plummeted from 44 to 5 days after intensive logging and road building.

To sustain Montana's elk hunting traditions, the state of Montana's 1992 Montana Elk Management Plan pledges that the state will: "promote maintenance of key unroaded areas that provide important elk security and offer backcountry or roadless recreation." (Organization, Helena, MT - #A21370.53100)

TO PREVENT HUNTING BEHAVIOR PROBLEMS

Montana is a state that prides itself on its wild nature and the opportunities available for hunting on that wild estate. It is wild land resource that has already been reduced by 88% statewide. Today, we seem perched on the brink of degrading the hunt into some form of drive-by-shooting with the excessive road systems that already exists on public lands and now machines ranging beyond the roads themselves.

In 1998 the Montana Fish, Wildlife and Parks Commission convened a Hunter Behavior Advisory Council to: *identify, define and recommend solutions to hunting behavior problems in Montana*. I served on that council. As part of our work we solicited the public's opinions on hunter behavior. Part of that solicitation encouraged people to address any issue they chose. The use of motor vehicles associated with hunting rose to the top of the bad behavior analysis. When this council developed a list of guiding principles conducive to positive hunting behavior and experiences one was:

"Land and wildlife management agencies have a responsibility to provide hunting environments that encourage ethical behavior."

The council further urged Montana Fish, Wildlife and Parks to:

"Encourage federal land managers to address hunter behavior and fair chase considerations in travel management programs."

It would seem that both of these items would be addressed through the adoption of a rule preventing the loss of our last roadless wild lands. I encourage you to avail yourselves of the recommendations of the report. (Organization, Helena, MT - #A2940.53300)

1207. Public Concern: The Forest Service should address the negative effects of roads on game species.

Hunting as a result of road building is improved for a few years. In the long term, hunting success always decreases as a result of roads. Hunting the fringes of our islands provides a refuge for SE Alaska's abundant game species, such as Sitka black-tailed deer, black and brown bears, mountain goats, and moose. (Individual, Juneau, AK - #A23242.53300)

I have been an avid bow-hunter for 18 years, and have bow-hunted for elk, deer, and bear on National Forests and other public lands in WA, NV, ID, MT, and ND. By and large most of the better hunts occurred in areas that were absent of roads. Designated roadless areas and other areas with low densities of roads are often attractive to big game for the security they offer and thus make for the best areas to hunt. I am all in favor of limiting development of new roads, and even more supportive of closing old 'spur' roads that are no longer needed for timber harvest. (Individual, Stanley, NJ - #A4004.90310)

1208. Public Concern: The Forest Service should not decommission existing roads.

BECAUSE ROADED ACCESS IS NEEDED FOR HUNTING

I am an outdoorsman and I use the National Forests a lot. It has become very difficult to hunt in many of our forests as it is. A large animal, such as an Elk, is impossible to get out of the woods on foot in many areas. I don't believe that all of the little logging roads should be open for travel, but a small percentage would make using the forests much more enjoyable. If more forest roads are closed then this will deter a large percentage of current users from going to the out-of-doors. There are already hundreds of thousands of acres of wilderness areas that have no roads. I don't believe we need any further restrictions on the use of "our land." Not everyone can or wants to hike to see the forest. Not everyone wants to ride a horse, rent a horse, or own a horse. Let's be fair to everyone, even the people who own quads, jet skis and trail bikes. (Individual, No Address - #A724.90320)

There are many people who are not hunters that contribute to the overall planning and success of our use of public lands. The anti-hunter groups want to believe that the worst thing that can happen to the forestland is to let hunters use it. These biased opinions are long in rhetoric and short on truth. It is the hunters who generate the most revenue for the continuation of public lands and natural habitat.

I am not asking you to build new roads into our forestlands. What I am asking is for you to not take anything away that is already there. I'm not even asking you to do any upkeep on the trails and roads that have [been] established by the logging industry. What I am asking you to do is to keep the existing, legal roads open for all to enjoy. If there is a logging road that is not designated "just don't keep it up"

let it go back to its natural habitat. I don't mind walking a little for the pure enjoyment of my hunts or camping trips (Individual, Las Cruces, NM - #A5434.91310)

1209. Public Concern: The Forest Service should allow timber removal for habitat management.

TO MAINTAIN QUALITY HUNTING AND FISHING

Our major concern lies with the decisions that affect the White Mountain National Forest that occupies approximately thirteen percent of the State of New Hampshire. We see an annual a loss of about twenty thousand acres of forest and field to development across the State. As this trend continues there is an ever increasing demand for outdoor recreational activities, including hunting and fishing on our public lands. There is a simultaneous effort on the part of some individuals and groups to reduce the opportunity for quality hunting or related wildlife enjoyment be removing the opportunity to manage vegetation in a way that enhances habitat quality for a majority of the game and non-game species found in New Hampshire and in the White Mountains. Over fifty percent of the White Mountain National Forest, under its current management plan, has been withdrawn from vegetative management. The roadless areas designation process has the potential to significantly increase that percentage as part of the current revision process. It is imperative that the ability to manage habitat through the use of commercial timber sales and through non-commercial applications be retained on these lands if the future needs of the wildlife enthusiasts in New Hampshire are to be met. (State Agency, Concord, NH - #A28779.45612)

Funding

1210. Public Concern: The Forest Service should use the fees collected from hunters and anglers to benefit hunters and anglers.

Please respect the fact that hunters and anglers pay money to manage our wildlife and it should benefit them the most. (Individual, Jefferson, OR - #A7985.91310)

In Michigan the DNR just are not getting things done. License fees go up and still nothing. Where are the hunters and fishermen's' funds going?

It should go to help hunters and fishermen. Not to build walkways for the gen. public, and slush funds, and all the other bull. If it gets worse, I will ask sportsmen to boycott License fees for at least one year or more depending on the outcome of the first year. (Individual, Au Gres, MI - #A11048.17120)

Allow Hunting and Fishing

1211. Public Concern: The Forest Service should allow hunting and fishing.

I implore you, as an avid hunter and fisherman, to keep the heritage and traditions of my enjoyments alive and well for years to come. Being in my early twenties and having many years ahead to look forward to enjoying the outdoor sports I love so much, please allow my tax dollars to not be wasted by hindering access to so many acres of land that my children and myself can someday enjoy. (Individual, Hudsonville, MI - #A3931.91310)

I am in favor of allowing hunting and fishing, within state-mandated legal limits, on all federally owned lands, including national parks. (Individual, Waco, TX - #A3956.91310)

Hunters and shooters need a place to go. Do not close off the forest to hunters and vacationers. (Individual, Pinole, CA - #A4189.91110)

I wish to be counted among the hunters and anglers who believe you should scientifically manage all fish and wildlife habitat in the National Forest System as valuable lands that will remain open to HUNTERS, ANGLERS, and other private citizens. I have the hope someday to bring my son to some of these areas that the monies I spent and helped raise through my efforts with Ducks Unlimited and license fees. (Individual, West Salem, WI - #A4957.91110)

We should keep the roads already in place, manage the wildlife as to what is best for all. Hunters and fishermen should be given first and top consideration in this as our dollars provide most of the funding. We also are the people who use and care for the land, waterways, and wildlife the most. (Individual, Hemet, CA - #A4313.15123)

BY MAINTAINING FREE ACCESS

Keep new roads out of prime habitat. Retain free access to hunting land and small lakes. New roads, NO! Keep our waters clean, our lakes free from polluted practices. New roads bring excessive pressure and "dirty" our clean waters. (Individual, Saint Cloud, MN - #A7468.50000)

IN WILDERNESS AREAS

I think that the holding of wilderness lands in the public trust is an excellent idea, providing that it remains open to hunters and fishermen. It is my opinion that these interests have long provided a significant source of conservation revenue and activities should be given access to engage in the pursuit of their passions. (Individual, No Address - #A12665.91310)

BECAUSE PEOPLE DEPEND ON THE FOOD THEY OBTAIN

As a hunter and fisherman I would like you to know that that's how I put food on the table. I don't do it just for fun or for the sport of it like some people I know. I hunt because it's a lot cheaper than buying meat at the store.

If you close down the public lands, where would I go to hunt for food? A lot of people don't have their own land to hunt on so they have to make do with what they have, and if you take that away you will have a lot more car wrecks because there would be no one to hunt the wildlife to keep the population down.

In my opinion and my friends' opinion it would be just stupid to close public land to hunting and fishing. (Individual, Bethlehem, GA - #A7957.91310)

1212. Public Concern: The Forest Service should allow hunting and fishing.

MOUNTAIN LION HUNTING

Hunters/hunting is the #1 proper tool for control of a species and I feel more hunting of Mountain lions should take place. (Individual, East Granby, CT - #A11510.90000)

COMMERCIAL FISHING

As a community that is directly dependent on a commercial fishing economy, a specific activity that should be allowed is commercial fishing in waters adjacent to the IRA. (Organization, Cordova, AK - #A23229.91310)

TRAPPING

With respect to uses of such land, I would be in favor of having it remain open for all legal purposes, including hunting, fishing, and trapping, for example. (Individual, West Swanzey, NH - #A15665.90100)

SPORT SHOOTING

I also believe that forests should be open for sports shooting as well as hunting. (Individual, Lafayette, CO - #A7448.90100)

1213. Public Concern: The Forest Service should manage fish and wildlife habitat as valuable lands that should remain open to hunters and anglers.

Convince the Bush Administration, elected officials and public land managers 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. Balance accessibility to National Forest lands, with the year round requirements of fish and wildlife (habitat, clean water, food, shelter, open space and disturbance management), while maintaining a functioning forest road system, including keeping roadless areas roadless (with science-based exceptions made for forest health, restoration, and other national needs). (Individual, Lyons, NY - #A1737.50000)

Count me among the hunters and anglers who believe you should scientifically manage all fish and wildlife habitat in the National Forest System as valuable lands that will remain open to hunters, anglers and other private citizens. (Individual, Mosinee, WI - #A5176.53100)

1214. Public Concern: The Forest Service should open closed roads for bear hunters.

IF THEY ARE OPENED FOR DEER HUNTERS

I think if you are going to open bars on closed roads for deer hunting, you should leave them open for bear hunters also. This could bring a discrimination issue to attention. (Individual, Ronceverte, WV - #A10801.91310)

Do Not Allow/Restrict Hunting and Fishing

1215. Public Concern: The Forest Service should prohibit hunting in roadless areas.

Hunters kill wildlife. This is not conducive to areas functioning as biological strongholds and wildlife refuges. Forest Service studies show over 65% of all sensitive species are directly or indirectly affected by roadless areas, including 81% of mammals and 82% of birds. I believe prohibiting hunting in IRAs would affect very few people; during the seven years I worked for the USFS, I rarely met hunters who went very far from a road. (Individual, Vista, CA - #A4838.91320)

Bear baiting should not be allowed anywhere, period. (Individual, Shawnee Mission, KS - #A96.90110)

Prohibit killing animals except in cases of specifically approved, publicly announced efforts to reduce herd size. (Individual, Atlanta, GA - #A873.90110)

WITHIN TWO MILES OF PRIVATE PROPERTY

Hunting should be prohibited for 2 miles around any private residence. Hunting with dogs should be forbidden in any US Forest. (Individual, Marion, NC - #A4691.91320)

BECAUSE IT IS NOT WELL REGULATED AND RESTRICTIONS ARE POORLY ENFORCED

Trapping is largely unregulated, and where restrictions do apply, they are poorly enforced. Most states require that traps be checked every 24 hours, but eight states (Idaho, Montana, Nevada, Oregon, South Dakota, Utah, Washington, and Wyoming) allow a lapse of two or three days; five states (Alabama, Alaska, Kansas, Michigan, and North Dakota) have no trap-check requirements. It is not uncommon in states with regulations and in states with none, for an animal to be left in a trap for weeks because the trapper does not check the trap. (Very few people trap full time, most trap in their spare time). In most cases trappers do not leave identification on their traps, so trappers cannot be traced or fined for neglecting their traps. Many trappers' regulations clearly benefit trappers. It is legal to set traps near schools, neighborhoods, and hiking trails, where they clearly are a safety hazard. In many states it is illegal to disturb a trap in any way, even to release a trapped dog, or cat. Only 15 states require any form

of trapper education. The fur trade has nearly caused the extinction of fishers, martens, and several species of wild cats. (Individual, Topeka, KS - #A12789.90420)

BECAUSE IT IS NOT EFFECTIVE FOR WILDLIFE MANAGEMENT

Trapping Does Not "Help" Wildlife. Supporters often claim trapping can be used for wildlife management and to control disease and "nuisance" wildlife. These claims are false.

Trapping is not wildlife management. It does not ensure stable, healthy wildlife populations. Trappers claim that they are simply "harvesting" those animals that would die anyhow. However, natural ecological factors such as weather and food supply, as well as wild animals' innate ability to limit their populations through natural means, are sufficient to create a balance between wildlife populations and their habitats. Nonetheless, trappers are permitted in some states to catch species, such as the lynx and river otter, whose populations are low. Moreover, there is some indication that healthy animals—who are more active than diseased or otherwise week animals—are more likely to be caught by traps, Thus, trapping is harmful to animal populations because it removes healthy animals and leaves behind those who are sick. (Individual, Topeka, KS - #A12789.90420)

1216. Public Concern: The Forest Service should prohibit hunting in roadless areas.

WITH DOGS

All citizens deserve to be able to use roadless areas with out being harassed or endangered by uncontrolled packs of hunting dogs. Bear hunters use radio collars to track dogs and do not accompany them or have control over the behavior of these dogs. We have had our entire poultry flock massacred several years in a row. Our horse has been attacked and injured each year. My child was attacked and injured. Bear hunters have threatened to burn people's homes if they complain about the trespassing and abuse of their dogs. Bear hunters have threatened our county commissioners if they attempt to curtail the abusive and dangerous activities of the bear hunters. There should be no hunting allowed in the US Forest with dogs. (Individual, Marion, NC - #A4691.91320)

TRAPPING

Please also prohibit all trapping activities in "roadless" areas of those same national forests. You must know that all humane organizations in this country, not to mention some other 89 countries and at least 7 of our States banned the cruel, steel-jawed leg-hold traps. They must no be allowed in our national forests. (Individual, Norfolk, VA - #A6957.90110)

NO trapping or hunting—especially NO steel-jawed traps that have been banned practically worldwide. (Individual, Merritt Island, FL - #A6906.90110)

1217. Public Concern: The Forest Service should prohibit fishing in roadless areas.

IN AREAS WITH ENDANGERED SPECIES

Local forester input would be very useful on this subject, prohibitions should be established that would best protect depending on the potential risk of damage to a particular area, i.e. no fishing in endangered species areas, fire bans in dry areas, no bikes in erosion prone areas, etc. (Individual, No Address - #A8998.90000)

1218. Public Concern: The Forest Service should close off-road vehicle trails to hunters.

Open more trails for ATV users and close these trails to ATV hunters during hunting season. (Individual, Saint Paul, MN - #A10994.90000)

1219. Public Concern: The Forest Service should regulate hunting.

BY REGULATING THE NUMBER OF TAGS SOLD

Wildlife also needs to be preserved and I think it is possible to manage both with the extinction of none. Hunting laws need to be looked at too. Many times too many tags are sold and at others, not enough of one kind are sold. Money should not be the consideration with the sale of tags. (Individual, Oak City, UT - #A40530.90000)

FOR HUNTING THAT DAMAGES PREDATOR-PREY DYNAMICS

Activities that depredate on wildlife within roadless areas can damage the proper functioning of a forest ecosystem. Activities like hunting wolves from helicopters or cougars with hounds can have extremely detrimental impacts on a system. The noise alone can form an auditory habitat fragmentation, not to mention the impact from the hunting on predator-dependent species and their populations (such as elk populations that explode when wolves are removed). Such activities that damage the predator-prey dynamics of a system shouldn't be allowed in roadless areas. Those areas should truly be reserved areas and all things therein should be protected, not just the trees. (Individual, No Address - #A29243.90110)

Outfitter-Guides

Summary

A few respondents write that commercial outfitters should be allowed in roadless areas. One Permit Holder requests that the Forest Service implement the Roadless Area Conservation Rule because it will benefit outfitter-guides. According to this respondent, "We have operated under special use permit on the Tongass for nearly 40 years and have experienced a 60% loss of suitable areas to conduct our business as a result of clear-cut logging. Continuing the roadless rule would stabilize this loss for our continued business operation. Another respondent urges the Forest Service to prohibit commercially directed group tours and expeditions. While on person states that it is wrong "that outfitters have the right to charge outrageous fees while using 'Public' lands!"

Allow Outfitter-Guides

1220. Public Concern: The Forest Service should allow commercial outfitters in roadless areas.

The Forest Service should consider the following when evaluating roadless areas.

Allowing non-intrusive commercial use (such as outfitting). (Individual, Bozeman, MT - #A3673.91216)

1221. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule.

BECAUSE IT WILL BENEFIT OUTFITTER-GUIDES

Please do not roll back the National Forest Roadless ruling. We have operated under special use permit on the Tongass for nearly 40 years and have experienced a 60% loss of suitable areas to conduct our business as a result of clear-cut logging.

Continuing the roadless rule would stabilize this loss for our continued business operation. (Permit Holder, Gustavus, AK - #A1716.10150)

Do Not Allow/Restrict Outfitter-Guides

1222. Public Concern: The Forest Service should prohibit commercially directed group tours and expeditions.

Also incompatible with roadless value protection are . . . commercially directed group tours/expeditions. (Individual, Port Angeles, WA - #A6179.91120)

1223. Public Concern: The Forest Service should prohibit outfitters from charging large fees for using public lands.

I strongly object that outfitters have the right to charge outrageous fees while using "Public" lands! (Individual, Bennett, CO - #A11158.91226)

Equestrian Use

Summary

Some respondents commenting on equestrian use, say it should be allowed in roadless areas, both in the form of horseback riding and in the use of pack animals. One recreational non-motorized organization requests that the Forest Service allow users to transport horses to existing trailheads in order to accommodate the "short, single-day rides" enjoyed by most recreational horse trail riders. Other respondents assert that the Forest Service should prohibit equestrian use, both in the form of horseback riding and in the use of pack animals.

Allow Equestrian Use

1224. Public Concern: The Forest Service should allow equestrian use in roadless areas.

HORSEBACK RIDING

I fully support protecting our nation's natural resources. I am an equine trail rider and believe in the "leave-no-trace" philosophy. I also believe I have the right to celebrate this nation's cultural heritage by riding a horse across our public lands and can do it without harm to our environment. (Individual, Long Lane, MO - #A1060.91215)

PACK ANIMALS

Activities that should be allowed: hiking and camping, non-motorized recreation, hunting and fishing, and horse and llama pack trips. (Individual, Rogue River, OR - #A15590.90100)

1225. Public Concern: The Forest Service should allow users to transport horses to existing trailheads.

The American Horse Council submitted comments in the past expressing our concerns that the needs of the recreational horse trail rider have been often ignored in national forests. Issues such as closure of equine trails, adequate parking at trailheads to accommodate horse trailers and safe stabling areas for horses at campgrounds have not always been addressed.

While there is a portion of the horse industry that enjoys lengthy, multiple-day rides, the majority of the recreational horse trail riders participate in relatively short, single-day rides. The type of riding enjoyed by most riders requires facilities for trailer parking and preparation of both horse and rider. Very few riders have the luxury of beginning a trail ride off-site. Most must transport their animals and gear to a trailhead before beginning the actual ride.

These riders are concerned that if the Forest Service (FS) bans new road construction, there may be perfectly legitimate areas where individuals could ride horseback, buy they will never have the

opportunity to do so because of the inability to transport their animals to a trailhead. (Organization, Washington, DC - #A23320.91215)

1226. Public Concern: The Forest Service should preserve equestrian access in roadless areas.

THROUGH MAINTENANCE AND MAPPING

Provide maintenance and maps for equestrian trails. (Individual, Sandy, UT - #A11009.91110)

1227. Public Concern: The Forest Service should allow historical and recreational pack and saddle stock use.

AS ALLOWED UNDER THE WILDERNESS ACT

Any new designations must not interfere with the original intent of the Wilderness Act and subsequent laws which include historical and recreational pack and saddle stock use, as public purposes equal in importance to the four public purposes specified in the Wilderness Act. (Individual, Bakersfield, CA - #A15786.20206)

Do Not Allow/Restrict Equestrian Use

1228. Public Concern: The Forest Service should prohibit equestrian use.

HORSEBACK RIDING

Snowmobiles, ATVs, other off-road vehicles, motorized boats, and animal travel including dog sleds and horseback riding should be severely restricted. (Association, Minneapolis, MN - #A19249.90110)

PACK ANIMALS

Commercial logging, mining, oil drilling, ORV use, and pack animals should be banned in all roadless areas. (Individual, No Address - #A12601.90110)

IN THE SHAWNEE NATIONAL FOREST

No . . . equestrian operations in Shawnee National Forest. (Individual, Glencoe, IL - #A21487.90110)

Camping/Shelters/Accommodations/etc.

Summary

General Comments – A few individuals ask the Forest Service to address privatization of forest facilities such as campgrounds, and to reevaluate "the use of private companies on the campgrounds who are charging for the use of public lands."

Camping/Shelters/Accommodations/etc. – Several respondents state that camping should be allowed in roadless areas; one person suggests expanding the present facilities to alleviate crowding. Some ask the Forest Service to allow the construction and maintenance of Adirondack shelters in roadless areas; to provide shelters for maintenance equipment and survival gear; and to allow the development of small-scale tourist accommodations. Other respondents assert that camping should be restricted. One individual suggests requiring permits for those camping in backcountry areas in order to reduce human-caused wildfire, while another suggests restricting camping in roadless areas to small groups.

Camping/Shelters/Accommodations/etc. General

1229. Public Concern: The Forest Service should address privatization of forest facilities.

CAMPGROUNDS

Other areas of concern to me are the privatization of many of the forest facilities, such as the campgrounds. (Red Creek campground in the Dolly Sods Wilderness—Monongahelia National Forest—West Virginia for example). (Individual, Laurel, MD - #A12185.90910)

1230. Public Concern: The Forest Service should reevaluate the use of campgrounds by private companies.

The Forest Service should reevaluate the use of private companies on the campgrounds who are charging for the use of public lands. (Individual, Klamath Falls, OR - #A21591.15122)

Allow Camping/Shelters/Accommodations/etc.

1231. Public Concern: The Forest Service should allow camping in roadless areas.

Hiking and camping should be allowed in these areas. (Individual, Olympia, WA - #A580.90100)

Allow camping with campsite restrictions at environmentally sensitive areas, where appropriate. (Individual, Bothell, WA - #A5228.90110)

BY EXPANDING FACILITIES

I would add that where camping is permitted that camping should be spread out so that people have a bit of privacy and isolation. Current camping in National Forests is a joke. Being crammed into a small area with other campers is not my idea of camping. (Individual, Palmer Lake, CO - #A23361.90000)

1232. Public Concern: The Forest Service should allow the construction and maintenance of Adirondack shelters in roadless areas.

Amenities such as Adirondack shelters and hardened trails should be allowed. Mechanized equipment and other equipment needed to construct or maintain trails or shelters should be allowed. (Elected Official, Libby, MT - #A18119.90100)

1233. Public Concern: The Forest Service should provide shelters for maintenance equipment and survival gear.

Provide shelters for maintenance equipment and survival gear. (Individual, Del Mar, CA - #A868.91710)

1234. Public Concern: The Forest Service should allow the development of small-scale tourist accommodations.

In response to your question about "specific activities that should be expressly prohibited or expressly allowed for IRAs through Forest plan revisions or amendments", the group wants to see development of small-scale tourism; small groups of independent travelers coming to Cordova and using existing facilities fits within this picture. Development of destination lodges for 50-100 guests and the accompanying infrastructure—including new roads on public lands—does not. (Organization, Cordova, AK - #A23229.91310)

Do Not Allow/Restrict Camping/Shelters/Accommodations/etc.

1235. Public Concern: The Forest Service should require permits for those camping in backcountry areas.

TO REDUCE HUMAN-CAUSED WILDFIRE

As a precaution against possible human-caused wildfire, permits could be required for back-country camping. (Individual, Fort Collins, CO - #A17987.91110)

1236. Public Concern: The Forest Service should restrict camping in roadless areas.

TO SMALL GROUPS

We feel one specific activity that should be prohibited from inventoried roadless areas would be camping permits allowing large numbers at gatherings. The impact on trees and grounds is astronomical. (Individual, Bayfield, CO - #A13395.90110)

Special Use Permits

Summary

One county commissioner suggests that the Forest Service should address issues related to special use permits—specifically, recreation activities that are proposed, in development, or in place but which are not currently covered in special use permits; and modifications or renewals of special use permits. An elected official asks the Agency to streamline the permit process for state agencies, "especially in instances where a state agency is attempting to gain access in order to carry out salvage logging or urgent forest health activities."

1237. Public Concern: The Forest Service should address issues related to special use permits.

RECREATION ACTIVITIES THAT ARE PROPOSED, IN DEVELOPMENT, OR IN PLACE BUT WHICH ARE NOT CURRENTLY COVERED IN SPECIAL USE PERMITS

While the DEIS (3-12) indicated that proposed recreation development in inventoried roadless areas would be allowed to continue if special use permits are in place, this is misleading since there are numerous activities that are proposed, in development, or in place, that do not currently have special use permits covering all of the activities or lands. (Elected Official, Roseburg, OR - #A11811.90000)

MODIFICATIONS OR RENEWALS OF SPECIAL USE PERMITS

The DEIS statement ignores that issue that will arise relative to modifications or renewals of the special use permits. We suggest that any rule clearly address this issue. (Elected Official, Roseburg, OR - #A11811.90000)

1238. Public Concern: The Forest Service should streamline the permit process for state agencies.

Streamlining of the permit process is also necessary, especially in instances where a state agency is attempting to gain access in order to carry out salvage logging or urgent forest health activities. Working with state land agencies to come up with "access plans" that could be incorporated into forest plans would be one way to facilitate the process. (Governor, State of Idaho - #A20141.15130)

Other Recreation Concerns

Summary

Respondents suggest a variety of specific activities they say should be prohibited in roadless areas. These include sporting events, fireworks, dog sledding, activities that involve cleated hiking boots, and golf area development. One Organization also suggests that the Forest Service set conservative carrying capacity limits in the Western Sound.

1239. Public Concern: The Forest Service should prohibit various activities in roadless areas.

SPORTING EVENTS

All . . . . sporting events should be prohibited in Roadless Areas. (Individual, Philipsburg, MT - #A15223.90100)

FIREWORKS

NO FIREWORKS! (Individual, No Address - #A583.90110)

DOG SLEDS

. . . animal travel including dog sleds . . . should be severely restricted. (Association, Minneapolis, MN - #A19249.90110)

ACTIVITIES THAT INVOLVE CLEATED HIKING BOOTS

Cleated hiking boots . . . should be prohibited. (Individual, Centennial, CO - #A26987.91120)

GOLF AREA DEVELOPMENT

Permanently protect all roadless areas from all environmentally destructive activities, including . . . golf area development. (Individual, Staunton, VA - #A29325.90110)

1240. Public Concern: The Forest Service should set conservative carrying capacity limits in the Western Sound.

With an estimated 600% increase in the number of recreational and sport fishing boats in the Western Sound with the Whittier access road opening, ought to compel the FS to set conservative carrying capacity limits in PWS and <u>to maintain the integrity of roadless areas in this region</u>. Regardless of jurisdiction disputes or pressures from the tourism industry, the FS must comply with laws that mandate assessment of the preferred alternative (such as the Endangered Species Act or ESA). The preferred alternative ought to be a conservative plan; the last thing the Sound and its inhabitants need are to be further stressed by pollution or overuse. (Organization, Anchorage, AK - #A23038.45622)

Designating Areas (*Question 8*)

Question 8: Designating Areas. Should inventoried roadless areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation, or should they be maintained under a specific designation for roadless area management under the forest plan?

This section includes six subsections: Designating Management Categories General, Wilderness Recommendations, Roadless Designation, Inclusion/Exclusion of Specific Areas from a National Roadless Rule, Use of Existing Forest Plan Designations, and Other New Management Categories.

Designating Management Categories General

Summary

The phrasing of Question 8 (above) gives rise to three distinct types of comments. Individuals simply write in a short statement, such as 'Recommend all roadless areas for wilderness,' or 'No more wilderness.' Others, both those who ask that the Roadless Area Conservation Rule be implemented and those who ask that it not be implemented, challenge the either/or choice implicit in the question. "This [Q8] is not an either/or issue," begins a typical comment, "and no changes in the Roadless Rule are needed to address it. By law, forest plans must evaluate the wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. The Rule allows the wilderness recommendation process to continue." These respondents often continue with suggestions for the preferred management of these areas. The third general type of comment takes the question more broadly and provides suggestions for evaluation criteria and various management designations for these areas. Given that management prescriptions by their very nature prohibit or allow a set of activities, many responses to Question 8 also list the various uses that should be allowed or prohibited under a specific roadless designation.

Among those who state that options presented in Question 8 are too narrow, a number say that allocation decisions should be made on an area-by-area basis. Some assert that these decisions should be based strictly on scientific criteria, with ecotype or ecosystem dynamics as determining factors.

A number of respondents recommend a wider variety of management classifications than simply roadless or recommended wilderness. Some ask state that as long as local forest prescriptions are consistent with a national rule, they should be available for use by local forest planners. Others ask that standard forest planning continue with the widest possible array of prescriptions available, including those that would otherwise be disallowed under the Rule because they allow roadbuilding or timber removal.

Some request that all roadless areas that are currently allocated at the local level to prescriptions that prohibit roadbuilding and timber harvest be removed from the current debate. Others ask that the Forest Service include all inventoried roadless areas under a national rule immediately, regardless of current classification status.

1241. Public Concern: The Forest Service should base management allocations on science.

BY ASSIGNING DIFFERENT MANAGEMENT PRESCRIPTIONS BASED ON ECOTYPE

This brings me to my point of how this forest system should be managed by good science that is checked by both ends of the spectrum, but in such a manner as certain areas are divided for particular uses and studied under a forest time scale (>30yrs) and no changes are made to the management of that study area for at least this duration. This ultimately would require that your agency take charge and designate areas of use/non use. This would be the most difficult step because both polarized groups will never be satisfied with any finalized plan you submit. Observing that the original intent of your department was to manage a national forest preserve, essentially for wood supply and only recently (~20years) has it turned into a recreational area management department, perhaps you should take this time to state your purpose as an organization so that no one will have a misunderstanding as to your role. You must manage the national forest system on a specific area basis too, as the Sitka Spruce in Alaska grow differently than the Douglas Fir of coastal Oregon as do the Pines of the Rocky mountains. Once you have obtained and stated your purpose and started managing forests based in good science then the future of our forests will be secured. (Individual, No Address - #A14.25340)

BY BASING LEVELS OF PROTECTION ON A SCIENTIFIC ENVIRONMENTAL ASSESSMENT

Wilderness or roadless designation and protection should be based on the level of protection needed as shown by scientifically based environmental assessment. (Individual, Tucker, GA - #A4543.25000)

1242. Public Concern: The Forest Service should consider ecosystem dynamics when creating land use designations.

If ecosystem management is not politically passé yet, let's apply it to this situation. In a landscape that is intensively managed for timber extraction (as many National Forests are), roadless areas are most often ecologically unique in that they are in a late seral successional stage (e.g. "old growth. But note the term "successional", implying an inherently dynamic system. In forest ecosystems fire, disease, windstorms, and logging are the main processes which reset the successional clock. So if maintaining late seral islands and corridors within our forests is the ultimate goal, then declaring a certain area roadless only eliminates the human-induced disturbance. And the sense of "permanent protection" such a legal designation implies is at odds with the reality of a dynamic system. One of the other "natural" factors is likely to reset the successional clock. This probability will only be exacerbated in a global warming scenario. A static roadless designation doesn't go far enough toward maintaining a stable percentage of late seral ecosystems. I propose a "dynamic designation". I know this would be an implementation nightmare, especially for a federal agency, but it has a lot of merits for all "stakeholders" concerned. (Individual, McCall, ID - #A25834.50100)

1243. Public Concern: The Forest Service should acknowledge that Question 8 is not an either/or issue, and no changes to the Roadless Area Conservation Rule are needed.

This [Q8] is not an either/or issue, and no changes in the Roadless Rule are needed to address it. By law, forest plans must evaluate the wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. The Rule allows the wilderness recommendation process to continue. Forest plans also designate roadless areas for continued roadless management, regardless of whether they are recommended for wilderness. The Rule ensures that roadless areas will, at a minimum, be protected from road construction and commercial logging. (Organization, Denver, CO - #A21367.25110)

Forest plans are obligated by law to evaluate wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. That doesn't change under the Roadless Rule. Forest plans also designate roadless areas for continued roadless management, regardless of wilderness recommendations. (Individual, Ridgway, CO - #A22352.25110)

Existing law requires forest plans to evaluate wilderness potential of national forests and make recommendations to Congress. The Rule did not change that, and no new rulemaking process can override that law. Forest plans should continue to protect the roadless quality of roadless areas pending any Congressional action on wilderness designation, and should take special care not to impair the suitability of such areas for wilderness designation. (Individual, Hyattsville, MD - #A22957.25110)

These designations are not mutually exclusive. The law states that forest plans must evaluate the wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. The Rule allows the wilderness recommendation process to continue. Forest plans also designate roadless areas for continued roadless management, regardless of whether they are recommended for wilderness and the Rule ensures that roadless areas will, at a minimum, be protected from road construction and commercial logging. (United States Representative, Washington - #A23209.25110)

The areas are roadless and should be managed as such. If some get proposed for wilderness, fine. But roadless is a management designation and whether these lands should be proposed for wilderness is a separate issue. (Individual, Conifer, CO - #A27021.25110)

1244. Public Concern: The Forest Service should consider a full range of management alternatives for roadless areas, not just "roadless" or "recommended wilderness."

Should inventoried roadless areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation, or should they be maintained under a specific designation for roadless area management under the forest plan?

No to both questions. Recommendation for addition to the wilderness system or long-term management as roadless are only two of the broad range of alternatives that should be considered for each unit. (Business, Lewiston, ID - #A7991.25000)

We think both; that is, of those roadless areas selected to remain roadless, some should be recommended for wilderness and some should be put in a management prescription, like semi-primitive non-motorized, to protect them. This also is a decision to be made in the forest planning process. A few areas may warrant proposed wilderness status. Most will be placed in an unroaded prescription. Either way, the public will point the direction for that split. It will then be up to Congress to decide if a recommended wilderness warrants that protection. (Elected Official, Saint Anthony, ID - #A4942.25000)

The FEIS Specialist Report for Wilderness and Special Designated Areas indicates that IRAs have acted as the "reservoir for future wilderness areas" and that because of the proliferation of special designations, such as wilderness, the number of roadless acres is in decline. The report notes that this trend parallels a decrease in the supply of appropriate settings for Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized recreation opportunities in an "environment of increasing demand." We certainly agree with this assessment and believe that it further illustrates the special value roadless areas have to the American people. Unlike the heavy and contentious restrictions of Wilderness Area designation, roadless area conservation can provide for a wider variety of opportunities while still protecting values associated with wilderness. Americans WANT to "preserve" green space but people also want access to this space for recreation. Roadless area conservation should be viewed, and used, as a way to provide the public with large holdings of high quality, yet non-contentious green space. (Organization, Pickerington, OH - #A3645.50200)

BOTH ROADED AND UNROADED CATEGORIES

For all inventoried roadless areas, forest plan revisions should consider a full range of management alternatives, from active management to wilderness recommendations. If selected in a forest plan revision or amendment to remain roadless, activities that may be permitted should include motorized and non motorized recreation, forest health treatments, watershed improvement activities, wildfire and insect and disease suppression, and some improvements not requiring permanent road access. (Individual, Grants Pass, OR - #A5305.25000)

Roadless lands vary enormously in terms of their terrain, ecologic communities, resources, social setting, and economic importance to surrounding communities. Planners must develop and examine a full range of alternatives for each, from development to potential wilderness. The prescription for every roadless unit should be designed to best fit its unique character.

The one-size-fits-all approach utilized in the initial rule making is unprofessional, as insult to the land, the management professionals responsible for it and the people who rely on it. . . . .

Each unit should be addressed individually in forest plans. The highest and best use or land access issues might require roads on some units. On the opposite end of the scale, some units might be best added to the wilderness system, taking on the extensive prohibitions required by that designation. Units to be managed in the long run as roadless, but not wilderness, can support a wide variety of uses, depending on their characteristics and specific resource considerations. (Organization, No Address, #A8227.25000)

UNROADED CATEGORIES ONLY

After deciding which areas should be recommended for wilderness, further evaluation should be done to allocate the remaining areas to appropriate prescriptions. Some of relevant allocation categories include: backcountry recreation, habitat for wildlife requiring unfragmented forest, community water-supply watershed, scenic areas, cultural or historic areas, habitat for rare communities or species, research natural areas, old growth restoration areas.

Inventoried roadless areas that are not recommended for wilderness should be allocated to prescriptions in the forest plan that maintain the roadless characteristics of the area in a manner consistent with the roadless area conservation rule, but that emphasize the special or unique characteristics of the area. While remaining consistent with the roadless area conservation rule direction, a prescription may be applied to a specific area or parts of an inventoried roadless area that recognizes specific additional prohibitions or mandates additional required management activities for that area. We have also noted that some of the allowed exemptions for road construction or timber harvesting may be identified as appropriate for some roadless areas and the area is allocated to an appropriate prescription. We would expect a variety of management emphases for various roadless areas. Thus, we believe it would be inappropriate to specify only one designation for the management of roadless areas that are not allocated to wilderness recommendations. (Civic Group, Roanoke, VA - #A1713.25300)

I think it is important for holistic forest management. Some areas may meet more of the demand for wilderness designation, while others may best achieve USDA goals through roadless area designation. One huge mistake, in my opinion, would be to cram all designated roadless areas into a single legislative box, though I predict that whoever's holding the most power over roadless areas would disagree with me very strongly on this. This is a case where dividing up the pie according to greatest overall need probably makes the most sense, but where petty internal politics could easily derail the whole process. (Individual, New Haven, CT - #A706.25120)

1245. Public Concern: The Forest Service should determine roadless area allocations on a site-specific basis.

I am a forester working in the Adirondack State Park in New York state. The park encompassed approximately 6 million acres, with over 2.6 million owned by the state and many more acres under construction easements. The state owned land has grown considerably since its inception in 1885 when the legislature enacted the law protecting the forest as. 'forever wild.' Today, the park is bigger than Yellowstone, Yosemite, and the Grand Canyon combined.

While not all of the park is set aside as wilderness, a considerable chunk of it remains a roadless preserve. Likewise, there are other areas designated for more intensive use, ranging from "wild forest" (less restrictive) to "primitive areas" (more restrictive). Using a single broad brush to create a rule that encompasses millions of acres may not be the best plan. (Individual, Schuyler Falls, NY - #A4779.25000)

1246. Public Concern: The Forest Service should assign land uses that are compatible with uses being implemented by adjoining landowners.

ON THE TONGASS NATIONAL FOREST

Because the Tongass National Forest so dominates the ownership pattern in Southeast Alaska, actions taken in the course of managing it can significantly affect adjacent landowners. As a considerate neighbor, management actions should recognize the following:

Forest Service should give greater consideration to assigning land uses that are compatible with the uses being implemented by adjoining landowners. Native corporations are largely managing their lands for intensive commodity uses. The State of Alaska owns lands dedicated to recreation and community development. The Forest Service should incorporate the needs of those designations into its management of adjacent federal lands.

Sealaska has a common boundary with many areas that are in some type of roadless category. Sealaska is developing, or has developed its adjacent lands. There are opportunities for the Forest Service to participate with Sealaska in a manner that would be advantageous to Tongass NF planning and administration. (Tribal Corporation, Seattle, WA - #A20468.45100)

1247. Public Concern: The Forest Service should remove from debate the roadless areas already designated for continued protection in existing forest plans.

Half the 58 million acres under consideration for permanent roadless status are already designated roadless in existing forest plans and should be removed from policy dispute. Keep the wild areas wild! (Individual, Butte, MT - #A10391.25100)

1248. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule regardless of the current land classification status of roadless areas.

In addition to Roadless Areas recommended for wilderness designation, all Roadless Areas should be managed under the guidelines of the RACR. This does not require additional categorization, it requires implementation. (Organization, Boise, ID - #A20363.25230)

(8. Designating Areas.) The most important action is to protect the unique values and the roadless character of these areas. I'm more concerned that they are given real protection than to argue over what to call them. (Organization, Helena, MT - #A20598.25000)

1249. Public Concern: The Forest Service should apply the same planning process to both roaded and roadless areas.

The inventoried roadless areas are the main areas on which all timber harvesting must necessarily take place because such a small portion of the National Forests in Alaska is roaded. Accordingly, the planning process should apply to both the roadless and roaded areas in exactly the same way and their management should be determined through the same process applied without regard to whether a specific area is roaded or unroaded. The Forest Supervisors have the best local knowledge for each national forest. Consequently, they should be given the responsibility for preparing and approving environmental impact statements for timber sales. (Association, Ketchikan, AK - #A20443.12125)

The planning process should apply to the roadless and roaded areas in exactly the same way and their management determined through the same process applied without regard to whether a specific area is roaded or unroaded. (Individual, Sitka, AK - #A12821.45513)

1250. Public Concern: The Forest Service should make land use designation decisions in a timely manner.

Reach a decision in a timely manner regarding the labeling of lands for specific uses. As you're aware, it's been nearly 40 years since the Wilderness Act and some lands are still in limbo. Get this process finalized and forward recommendations to Congress. There are sufficient federal lands for everyone to get some of what they want. However, the indecision and flux of the last couple of decades has not enhanced the publics' view of the job being done by the Forest Service. (Governor, State of Montana - #A17660.14400)

Wilderness Recommendations

Summary

General Comments – A number of respondents note that the local forest planning process must consider additional wilderness recommendations, and assert that a national rule does not change this. Others state that the wilderness consideration process should be modified, and suggest such changes as subjecting all recommendations to a local vote or to a local resident decision-making process of some kind. A few individuals suggest that in limited cases, such as national emergencies or wars, wilderness status should be temporarily revoked for resource use, followed by full land restoration and reinstatement of wilderness status.

Some believe that the Forest Service should reverse its institutional resistance to wilderness designation in order to protect a wider range of ecosystems and meet the changing priorities of the public. Groups also cite the low percentages of capable and available roadless areas that are recommended for wilderness designation in current forest planning efforts as evidence of perceived ongoing internal agency bias against wilderness.

A number of respondents answer Question 8 simply with a statement for or against recommending inventoried roadless areas for wilderness designation versus assigning them to a separate roadless category. Respondents request wilderness designation. Those who request wilderness designation provide a wide range of reasons for their position, including the need to set aside America's few remaining wild places; the need to balance environmental protection with human uses; the need to ensure protection of these areas regardless of political changes in the administration; and the desire to reduce costs of this rulemaking to taxpayers. Some who request additional wilderness designations provide names and descriptions of specific roadless areas they say should be recommended to Congress. (A list of these areas, as well as a list of areas that respondents say should be assigned to a designated roadless category, is found in Appendix F. This appendix also lists specific areas that some respondents ask not to be recommended for wilderness, or ask not to be designated roadless.)

Other respondent do not agree that additional wilderness designations are appropriate. Those who request no additional wilderness designation often state that there is already enough wilderness set aside; that wilderness areas prohibit too many recreational activities, such as mountain biking, snowmobiling, and ATV use; or that wilderness is inherently elitist. Some people propose that if Congress fails to act on wilderness recommendations within a set amount of time, then these areas should be returned to multiple use management.

Wilderness Recommendation Criteria – Comments about the criteria that should be used in the wilderness recommendation process vary. Numerous respondents assert that the Wilderness Act itself, as well as the Forest Service Manual and Handbook, already provide detailed and sufficient guidance in this process. Respondents do, however, enumerate specific characteristics they say should be emphasized or included in the recommendation process. These include expanding the criteria for total acreage to include areas less than 5,000 acres. Others state that acreage alone is less important than proximity to other protected areas, such as existing wilderness areas or National Park Service lands. Still others assert that decisions should be based on whether a given roadless area can function without active management or whether an area is within a complex large enough to sustain the role of natural fire regimes. Some request that the Forest Service ensure that all recommended areas truly have no roads. Finally, some suggest that roadless areas that do not initially meet recommendation criteria should continually be reevaluated to see if conditions have changed which would allow them to be included.

Management of Roadless Areas that Do Not Meet Wilderness Criteria – A number of respondents recognize that not all roadless areas will meet strict wilderness recommendation criteria, and make suggestions about management direction for them. These respondents suggest that all non-qualifying areas should be assigned to a specific roadless category. Others ask that they be assigned to any existing category consistent with a national rule. A number of people ask that any areas that do not meet wilderness criteria be returned to full multiple use management. A few suggest existing management categories that should be assigned to non-qualifying areas, from general forest to backcountry non-motorized.

Relationship Between Roadless and Wilderness Management – Respondents discuss the tradeoffs or connections between roadless area protection and wilderness designation. They say that all roadless areas should be maintained in a condition that will preserve their wilderness characteristics. Some assert that this must be done to maintain the option for Congress to add more areas to the National Wilderness System. Others say that recreational and commodity pressures have become so intense that managing these areas as unroaded is vital. Some ask that the Forest Service bear the burden of proof that roadless areas should be entered.

Others assert that the Agency must maintain the conditions present when the Wilderness Act was passed in 1964 in each roadless area, whether roaded, unroaded, or otherwise modified by human activity. Still others state that inventoried and uninventoried roadless areas should not be managed such as to preserve their wilderness characteristics, saying that amounts to de facto wilderness management. These respondents ask that the Roadless Area Conservation Rule not be implemented. (See also Chapter 2: Other Legal Concerns: Federal Laws, Acts, and Policies: *Wilderness Acts*.)

Wilderness Recommendations General

1251. Public Concern: The Forest Service should make decisions to recommend areas to Congress for wilderness designation through the forest planning process.

The Forest Plan should make the decision whether or not an area should be recommended to Congress for Wilderness designation. (Individual, Grants Pass, OR - #A5305.25200)

The Wilderness Study Area category should be retained. Those designated roadless areas that might qualify for the Wilderness System should be managed as WSAs under management that will not jeopardize their later possible designation by the Congress as Wilderness. Those roadless areas that cannot qualify as WSAs should be managed under the forest plan, with full multiple use values considered. (Individual, Asheville, NC - #A8386.25220)

1252. Public Concern: The Forest Service should designate qualifying areas as wilderness study areas until Congress takes action on them.

Inventoried roadless areas that meet the guidelines for consideration as wilderness areas should be designated as wilderness study areas. Congress would then decide on wilderness designation using the goals for conservation and protection of wild areas as priorities. (Individual, Gallatin Gateway, MT - #A19100.25220)

1253. Public Concern: The Forest Service should reverse its institutional resistance to recommending roadless areas for wilderness designation.

Every roadless area should be carefully considered for possible Wilderness designation, in whole or in part. The special values of these areas flow from their undeveloped condition. The reality of modern life is that there are constant pressures to alter the natural condition of roadless areas for economic gain or convenience. The long term viability of these areas as reservoirs of natural values would be enhanced by a higher level of legal protection than just an administrative rule. Designation as Wilderness Areas is the highest level of legal protection for natural areas that is available in our society and should be pursued for all qualifying areas. In general, Forest planning should favor Wilderness designation of roadless areas. Designation as Wilderness should be recommended except when local planning can clearly demonstrate that this designation would be incompatible with an important natural or social value of a particular area. The “burden of proof” should be to show that the area is not suitable for Wilderness. For thirty years, the Forest Service has insisted on the opposite standard. They have placed the “burden of proof” on those who wish to preserve a roadless area and have been biased in favor of development and intrusive management. It is time to reverse this bias before we lose all our important natural areas. (Individual, Palo Alto, CA - #A15827.25210)

The local forest plan process should re-evaluate Roadless Areas for inclusion in the National Wilderness System and should make new recommendations based on a new evaluation. In the recent forest plan revisions in National Forests of Idaho there has not been an adequate reconsideration of wilderness values and public interests in wilderness designations. The Forest Service is operating under outdated assumptions of public interests and needs in wilderness designations. This should be corrected in future forest plan revisions. (Organization, Boise, ID - #A20363.25230)

Region 2 Has Poor Record for Recommending Wilderness Protection for Roadless Areas.

The failure of Region 2 forest plans to protect roadless areas is further reflected in the Region’s failure to recommend roadless acres for wilderness protection in recent forest plan revisions. Frankly, Region 2’s record on identifying, protecting, and recommending for wilderness roadless areas during the forest planning process has been abysmal. In the previous four forest plans revised in the last few years in Region 2, the Forest Service identified as roadless a total of 1,387,853 acres on the Black Hills, Rio Grande, Arapaho-Roosevelt, and Routt National Forests. Of this, conservationists recommended 806,430 acres for wilderness, and the agency itself found hundreds of thousands of acres to be “eligible” for wilderness. Yet, the Forest Service recommended only a paltry 8,551 acres for wilderness designation. In other words, Forest Service Region 2 released more than 99.3 % of existing roadless areas to other uses, which include, in some areas: snowmobiling, off-road vehicle travel, logging, roadbuilding, and other uses inconsistent with wilderness.

Even though the Forest Service found more than one-half million acres to have all of the characteristics of wilderness and even to be “available” for wilderness, the Forest Service disregarded its own findings that recreational use of wilderness is increasing and that some existing wilderness areas are already being overused and degraded, by concluding that there is no need for additional wilderness. In addition,

although the agency repeatedly found that recommending existing lower-elevation roadless areas could make important contributions to the protection of under-represented ecosystems in the National Wilderness Preservation System in each of these four Forests, the Forest Service again ignored its own findings and concluded that no additional wilderness was needed. (Organization, Denver, CO - #A21367.25200)

1254. Public Concern: The Forest Service should allow temporary withdrawal of wilderness status for resource commodity use followed by restoration to wilderness condition.

If wilderness holds critical materials and the methods of exploitation is ephemeral there is no reason not to temporarily withdraw the area from wilderness designation and take advantage of it. Once the materials have been exploited it can be returned to its original condition and re-designated wilderness. Civil law fluctuates with the times in every other part of the body politic, why not land-use law? (Individual, No Address - #A8879.25000)

DURING WARTIME

These areas should be proposed for wilderness designation. However, there should be a caveat that these areas may be opened in the future if the American people require the resource for catastrophic events of national significance, like war. This caveat should not include language that would make it easy to renege a wilderness designation, but should make the areas available to the American people in emergency situations only. A recession, poverty, consumer greed, etc. do not qualify as emergency situations that would require opening these areas to harvest. The only situation of national significance that would warrant the removal of a wilderness designation on a roadless area would be war, where the harvestable supplies are required to help sustain the country during the war. There should be another caveat that says that those lands removed during such times of national significance should revert back to wilderness designation regardless of condition once the war ends, or within one year of the end of the war. But, for now, those lands should be proposed for wilderness designation. Perhaps lands that will be maintained in perpetuity as wilderness could be designated as a Wilderness A Area and one of the formerly roadless areas turned wilderness could be designated as a Wilderness B Area. That would distinguish between those lands that are out of reach permanently and those within reach during wartime. This Wilderness B designation shouldn't be a means to harvest timber under the guise of a wilderness designation. It should allow those areas that were roadless to be accessible in the event of war, but at no other time. (Individual, No Address - #A29243.25000)

1255. Public Concern: The Forest Service should allow local communities to decide whether to establish roadless and wilderness areas.

The Forest Service should consider establishing an alternative that would allow local communities to establish or not establish roadless areas and Wilderness with local Forest Officials without any influence from National or Regional Officials inside or outside the agency. (Individual, Alturas, CA - #A28581.13230)

1256. Public Concern: The Forest Service should subject all wilderness recommendations to a binding vote at the county, state, and congressional district level.

"Inventoried roadless areas" should be proposed for Wilderness designation immediately, and designated by hard-release legislation, with conditions. A proposal for wilderness designation will only be forwarded to Congress after forest-wide "ground-truthing" work has been approved by: 1) a vote on the first Tuesday in November in an even-numbered year by all citizens at the county, Congressional district, and state level; 2) any county voting against a wilderness designation shall have no lands within its boundaries designated; 3) any Congressional district voting against wilderness designation will also have no lands designated within that district; and 4) no state in which a majority of citizens votes against additional wilderness designation shall have such designation anywhere in the state.

If a majority of state citizens vote for wilderness, but no county and no Congressional district votes to approve such designation, then no land will be recommended, and "hard-release" legislation will be forwarded to Congress for approval.

If a county votes for approval of lands within its boundaries without approval at the state or Congressional-district level, then the issue may go up for a second vote in the next even-year general election. But if approval fails for a second time, then no more lands within that state can be designated. (Individual, Whitefish, MT - #A20672.25230)

Do Recommend Roadless Areas for Wilderness Designation

1257. Public Concern: The Forest Service should recommend all roadless areas for wilderness status.

Please add the 60 million acres to the existing wilderness nationwide. The damage to our land using open roads can be seen in Montana. There's not much time to take care of our home. (Individual, Helena, MT - #A5256.25210)

Designating Areas—Roadless areas absolutely should be proposed to Congress for wilderness designation. (Individual, No Address - #A5242.25000)

The last roadless areas in America should all be designated wilderness and left alone. (Individual, Big Sky, MT - #A106.25200)

I think that [wilderness designation] would give them more protection (i.e. they should be wilderness areas). A new roadless management plan would lead to loopholes I didn't want. (Individual, Yelm, WA - #A17978.25200)

I'm inclined to prefer that the inventoried roadless areas, as defined in the previous record of decision made before the current Administration's "review" misstep, revert to Congressionally designated Wilderness, as I believe that would give the highest level of protection of natural forest ecosystem values under current federal management strategies. Unless a stewardship plan for Roadless emerges for the Forest Service, which would convey a higher level of protection to be the best available. (Individual, Goldendale, WA - #A21668.25200)

TO PRESERVE WHAT WILD AREAS ARE STILL LEFT

Designating Areas—Yes, all designated roadless areas should be given consideration for wilderness designation and some may certainly qualify. This may be a good time to expand wilderness areas while we still have some additional wild areas left. However, not all roadless areas will qualify. You should consider a national roadless management process that covers these not-quite-wilderness areas. (Individual, Boulder, CO - #A5250.25000)

All of these lands should be added to the National Wilderness System: Too much of the national forest system has been degraded by over 400,000 miles of logging and mining roads, millions of acres of impoverished over-cut lands and other facets of industrial development. Roadless areas need to be off limits to motor vehicles, including all-terrain vehicles. Roadless areas need little or no protection from lightning-ignited wildfire and native insects. These and other natural processes are vital elements of the ecosystem. (Individual, Richmond, CA - #A18059.25210)

TO STRIKE A BALANCE BETWEEN ROADED AND UNROADED AREAS

All of the 58.5 million acres identified in the Final Environmental Impact Statement should be recommended to Congress for inclusion in the National Wilderness Preservation System, and the sooner this recommendation is made the better, or it is clear from this process and your intent behind it that we will continue to lose, at an alarming rate, remaining lands on national forests that qualify as wilderness.

This Rule only sought to strike a balance; already two-thirds of our national forests have had roads constructed through them, and but one-third remains without roads. Saving the last third does not seem an unreasonable balance to strike. It is not as if a greedy American public is asking that a half or three-quarters be protected in a natural state. (Individual, Ward, CO - #A18076.25210)

TO ENSURE THE LEAST POSSIBLE DAMAGE TO THE ENVIRONMENT

Because it is so difficult to manage roadless areas in ways that enable the least damage, they should be designated and managed as wilderness. This would provide some semi-clear guidance and allow for helpful management steps. For example, snowmobiles (ATVs) are very damaging to plants and especially wildlife. They should be kept out of roadless areas. Wilderness designation would aid in this effort. (Individual, Salt Lake City, UT - #A13520.25200)

TO ENSURE THEIR CONTINUING PRESERVATION THROUGH CHANGING ADMINISTRATIONS

If we are to treat these areas as wilderness, it would be forthright to label them in that manner. That would also ensure that they are not liquidated by changing Forest Service or executive administrations. (Individual, Lacey, WA - #A530.25200)

I believe that inasmuch as we can meet the requirements of the Wilderness Protection Act, inventoried roadless areas should be designated as wilderness. That way they are protected from future "reviews" by corporate-friendly administrations eager to please their contributors by legislative slight-of-hand that opens the door to developing these fragile areas. If they are not designated wilderness, then another permanent designation must be "invented" by which these areas are placed in a natural trust so that they are there for future generations of Americans. (Individual, Denver, CO - #A20707.25100)

TO ENSURE SUSTAINABILITY OF HUMAN LIFE

The bottom line for everyone is clean air, clean water, a functional biosphere. If sustainable human life is the criterion, the only answer is wilderness designation. That issue trumps all economic questions. (Individual, Black Mountain, NC - #A707.25200)

1258. Public Concern: The Forest Service should recommend all roadless areas for wilderness status.

TO REDUCE COSTS

Designate all roadless areas for wilderness now and be done with it now!! Get it passed through Congress quickly so that we can reduce Forest Service staffs and therefore reduce taxes. (Individual, Montrose, CO - #A370.25210)

The inventoried roadless areas selected for protection should also be proposed to Congress for wilderness designation, to give them the highest degree of protection from development. Otherwise regulations for protection will have to renegotiated continuously under pressure from economic interests, which is a waste of taxpayer time and money. (Individual, Boulder, CO - #A19113.25210)

1259. Public Concern: The Forest Service should recommend as many wilderness areas as possible.

The more wilderness designations the better. Focus on pristine wilderness values. (Individual, McDonough, GA - #A805.25000)

1260. Public Concern: The Forest Service should recommend additional wilderness areas on a site-specific basis.

EACH TIME A FOREST PLAN IS REVISED

Each roadless area will require a decision based on its current condition, and how it will be managed in the long run. Some areas should be withdrawn for inclusion in the Wilderness System. This will set

general management parameters, but local folks have some ability to site-specifically tweak management options. Some areas can be withdrawn from roading and timber management for the next cycle. These areas may not contain true wilderness attributes, and the timber may not currently require active treatment. Such areas develop a different set of management parameters at the local level that may allow such use as motorized recreation, chainsaws, etc. Some areas may require immediate access and silvicultural treatment. These areas may carry a different set of parameters, and allow for a decision to do such things as maximize wildlife habitat, or add no new open roads to the system. (Association, Kamiah, ID - #A3685.25000)

BECAUSE LOCAL INPUT IS NEEDED

There may be areas suitable for wilderness designation, and I do not disagree that appropriate management of forest lands should include development restrictions. However, this should be decided on a case-by-case basis, with local input, particularly, but not limited to, direction from the professionals of our local forest service offices. (Individual, Greybull, WY - #A346.25230)

This should be decided on a case-by-case basis at a national level wherein public input should be given significant weight and time, with sufficient notice. (Individual, Astoria, OR - #A476.25230)

1261. Public Concern: The Forest Service should recommend qualifying roadless areas to Congress for wilderness designation.

Our National Parks are great and preserve much spectacular beauty, but they are often crowded and not the best places to go for serenity and enjoyment of natural surroundings. The national forests provide an escape for campers, fishermen, hikers and nature lovers and their families from the stresses of modern life. Designation as wilderness would further protect these areas for all Americans who appreciate the value of nature. (Individual, Port Angeles, WA - #A1044.70320)

It is the responsibility of the Forest Service to identify all lands that are appropriate for wilderness designation. Some roadless lands may qualify, certainly many will not. Management of roadless areas in general need not be as restrictive as management of wilderness areas. (Individual, Two Harbors, MN - #A17502.25220)

Certainly some units should be recommended to Congress as potential additions to the wilderness system. These would be those with outstanding wilderness attributes, large enough to serve as stand-alone wilderness. This might also include units adjacent to existing wilderness. (Association, Spokane, WA - #A21364.25220)

TO COMPLY WITH EXISTING LAW

By law forest plans must evaluate the wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. (Individual, Cooper, TX - #A13262.25000)

TO PRESERVE THEIR WILD CHARACTERISTICS FOR THE LONG TERM

I strongly believe that all remaining roadless areas must receive the highest level of protection viable, in order to preserve their wild characteristics for the long term. I strongly support Wilderness designation for any area that meets the criteria for such status. (Individual, Portola, CA - #A695.25200)

TO PREVENT DEVELOPERS FROM BUILDING THERE

Homeowners bear the ultimate responsibility for their property and the decision to encroach on pristine land. Reasonable measures should be taken to protect property, but I think property owners should be financially responsible for that effort. Don’t build there and designate all roadless areas as wilderness so that real estate developers cannot build. (Individual, No Address - #A5216.35130)

BECAUSE FOREST PLANS HAVE NO TEETH

If the U.S. National Forest plans could have the same “teeth” as Congressional approved wilderness areas, the forest plans would suffice. Unfortunately, this does not seem likely; therefore, wilderness

designation is the only alternative until the Federal government and Forest Service can create comparable legislative protection to allow for the few uses not permitted in wilderness areas, such as the use of chain saws, selective and restricted use of off-road motorized vehicles, carefully selected logging, etc. (Individual, Geneva, NE - #A15512.25210)

1262. Public Concern: The Forest Service should recommend qualifying roadless areas to Congress for wilderness consideration and allocate other areas for roadless management.

If the inventoried areas meet all the legal requirements for wilderness, then there is no reason not to serve them up to Congress. If for some reason they do not meet the standard, then they can just be left as designated roadless areas. (Individual, Billings, MT - #A277.25000)

Both should be pursued. This is not an either/or issue, and no changes in the Roadless Area Conservation Rule are needed to address it. By law, forest plans must evaluate the wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. The Rule allows the wilderness recommendation process to continue. Forest plans also designate roadless areas for continued roadless management, regardless of whether they are recommended for wilderness. The Rule ensures that roadless areas will, at a minimum, be protected from road construction and commercial logging. (Individual, Woodstock, NY - #A14020.25000)

National Forests should be able to continue to propose Roadless Areas for designation as Wilderness. National Forests should also be able to continue to add Roadless Areas to the RACR. No changes need to be made in the Rule. (Individual, Philipsburg, MT - #A15223.25000)

The issue of wilderness designation is separate from the roadless rule. Forest plans should evaluate roadless areas for wilderness consideration as is currently required. However, even if roadless areas do not receive such wilderness designation, they should still receive the protections provided under the roadless rule. (Organization, Oneonta, NY - #A15449.25200)

This is yet another very leading question [8]. . . .the baseline of protection for roadless areas should be protection through the Roadless Rule rather than the forest planning process. The forest planning process should only be used to address any protections above and beyond the protections provided for under the Roadless Rule.

Furthermore, the choice provided is a false one. The protections of the Roadless Rule and recommending a roadless area for wilderness designation are not mutually exclusive. Forest plans are already required to evaluate the wilderness potential of all roadless areas and recommend suitable lands for wilderness designation. The Roadless Rule does nothing to change the wilderness designation process and a particular roadless area can both be protected as a roadless area and recommended for designation as a wilderness. (Organization, Boise, ID - #A8240.25110)

Posing this question [8] as an either/or issue is inadequate. There are various options for management, which still protect roadless values, both in the interim and in the long run. When the Pike and San Isabel revises its management plan we expect them to analyze all IRAs, in addition to other roadless areas proposed by citizens or identified by the Forest Service, for possible Wilderness designation.

The Rule allows the normal administrative, planning and legislative options to be exercised. Implementation of the Roadless Area Conservation Rule would, at a minimum, insure that these areas would not be disqualified from future Wilderness designation by road construction or commercial logging. (Organization, Littleton, CO - #A8829.25110)

TO BEST PROTECT LARGE WILD COMPLEXES

For the most part, all of these identified roadless areas should be maintained and managed under a formal roadless designation, planning and allocation process. Of course, the forest planning process

should determine wilderness recommendations as required by statute and regulation. The emphasis on wilderness designation should be based on this vibrant literature we have spoken of which suggests formal protection of large wild complexes. The first concern ought to focus on adding large (50,000+ a.) roadless areas contiguous to the large extant designated wilderness (i.e. the High Uintas Wilderness and hundreds of thousands of contiguous roadless lands). Second, adding roadless blocks to other existing wildernesses. Third, protecting as wilderness large roadless areas (50,000+ a., e.g. the 120,000 acre Lakes Roadless Area, the western portion of the High Uintas separated from the HUW only by the Mirror Lake Scenic Highway). Protecting roadless areas should focus on protecting roadless areas and clusters of roadless over or equaling 5,000 acres. (Organization, Hyrum, UT - #A13496.25200)

Roadless areas should be combined with our national forest system and wilderness system to create an expanded biodiversity landmass for animals and human recreation. This human recreation area should be non-motorized. Hunting and fishing should be allowed. Camping should be allowed. Snowmobile use and other off-road vehicles should be banned. (Individual, Tucson, AZ - #A872.45100)

1263. Public Concern: The Forest Service should recommend specific roadless areas for wilderness designation.

We urge you to provide Wilderness protection for much of Alaska's Chugach National Forest. Currently, there is none. Wilderness is good business. Wilderness is sustainable. Please insist that the plan revision include Wilderness protection for the existing Wilderness Study Area, the Big Islands of Prince William Sound (Knight, Montague, and Hinchinbrook), the Copper River Delta and the Kenai Peninsula. (Organization, Seward. AK - #A24021.25000)

Secesh, Needles, and Caton Lake Roadless Areas. These three areas should be considered the South Fork Salmon Wilderness in three units. In the included map, the red areas of each of these units shows where the Ponderosa pine habitat it. These are the lands most coveted by timber interests and the most in need of protection. They also include the greatest number of songbirds, owls, and forest carnivores and are increasingly rare because of the Ponderosa pine type habitat. They include the Secesh (South Fork north) west of Zena Creek and along the South Fork of the Salmon; the Needles (South Fork west) along six mile ridge and beside the South Fork of the Salmon to the north and South of Blackmare Creek; and Caton Lake (South Fork east) along the South Fork of the Salmon and the East Fork of the South Fork Salmon River.

The South Fork north area is, fortunately, little threatened. This area includes the lakes portion of Twentymile Lakes, Loon, Enos, and Jungle Lakes, part of the Secesh River and the South Fork. The only area that is threatened is Loon Lake which is popular with trail bicycles. Quartz Creek on the southeast of the area is another spectacular drainage.

South Fork west is another subject. Sixmile ridge, above Krassel, has been controversial for may years because of its timber potential. Include it in the proposed wilderness and go get your timber in another place. It is sensitive because of its place adjacent to the South Fork and Fitsum and Buckhorn Creeks. In addition, the Ponderosa pine habitat is increasingly uncommon and most of this I would say is not in serious jeopardy from fire. The rest of the South Fork west region from Cly Lakes and the Lake Fork watershed and Idler drainage to Nick, Buckhorn and Backmare lakes and the creeks that drain them are shoe-ins for wilderness designation. The Buckhorn drainage is a special case and one that has recently gone from worse to better. A few years ago the main stem Buckhorn Creek "blew out" sediment in a rain on snow storm, carrying much of the road with it. Then the Forest Service chose to close about 6 miles of the road along with pulling out culverts; the "road" is now a trail. Please include this trail in the recommended wilderness. It is roadless at least.

South Fork east (including the Boise NF portion of the Caton Lake Roadless Area) is the lesser known of the South Fork roadless areas and deserves to be wholly designated as wilderness. The area has a myriad of small tributaries and much wild un-traveled area. It contains wolf habitat, endangered salmon and bull trout habitat, and home for mountain goat, cougar, martin, wolverine, goshawk, and three species of grouse (ruffed, spruce, and blue grouse). The Thunderbolt Mountain timber sale illegally cut into this area on the south. (Individual, Boise, ID - #A21369.25200)

IN CONJUNCTION WITH THE BUREAU OF LAND MANAGEMENT, RECOMMEND ALL ROADLESS AREAS IN OREGON FOR WILDERNESS THROUGH A COMPREHENSIVE STATE WILDERNESS BILL

By law, new wilderness area recommendations must be proposed by the Forest Service to Congress during the forest plan revision process for possible new wilderness legislation. The 1.9 million acres of inventoried roadless areas in Oregon, plus the remaining 2.9 million acres of unprotected roadless areas on Forest Service and BLM lands should be designated as wilderness through a comprehensive statewide forest wilderness bill. (Individual, Blue Lake, CA - #A3671.25000)

1264. Public Concern: The Forest Service should manage some roadless areas under specific management prescriptions and some under wilderness designation.

Roadless areas under specific management or wilderness designation: Some of Both. (Individual, Duluth, GA - #A3724.25000)

Should inventoried roadless areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation, or should they be maintained under a specific designation for roadless area management under the forest plan?

Sounds like both would work—use a blend of the two. (Individual, No Address - #A4497.25000)

Wilderness designation and roadless area protection are not precisely the same, and both designations should be maintained in forest plans. Many roadless areas would be suitable for wilderness designation, but Congress's failure to designate roadless areas as wilderness should not prevent continued roadless management, regardless of wilderness recommendations. (Individual, No Address - #A4777.25000)

Do Not Recommend Roadless Areas for Wilderness Designation

1265. Public Concern: The Forest Service should not recommend roadless areas for wilderness designation.

Should roadless areas selected for protection through forest plan revisions be proposed to Congress for formal wilderness designation? These areas would not meet the criteria for wilderness areas: they have roads running through them and there are signs of man, culverts, ditches, mine shafts, etc. Besides, we have enough wildernesses for people to tramp through now. (Association, Baker City, OR - #A7990.25240)

BECAUSE ROADLESS AREA CONSERVATION WILL PROTECT THE SAME CHARACTERISTICS THAT MAKE THESE AREAS SPECIAL, BUT WITHOUT ELIMINATING ACCESS

The AMA believes that to impose further restrictions on areas managed as roadless by proposing them for Wilderness designation would do nothing to enhance the protection of roadless area characteristics. In fact, Wilderness designation would act to reduce the long-term health of some roadless areas by restricting management options. The Roadless Area Conservation Rule prohibits or limits activities that threaten the roadless characteristics of IRA. The FEIS lists roadless area characteristics as: Soil, water and air; Sources of clean water; Diversity of plant and animal communities; Habitat for threatened, endangered, proposed, candidate, and sensitive species, and for those species dependent on large, undisturbed areas of land; Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized classes of recreation opportunities; Reference landscapes; Landscape character and scenic integrity; Traditional cultural properties and sacred sites; other Locally identified unique characteristics. With the exception of some of the characteristic recreation opportunities, these are all attributes commonly associated with designated Wilderness areas. Roadless area conservation will protect the same characteristics that make these areas special and worthy of Wilderness consideration but will do so without eliminating access. (Organization, Pickerington, OH - #A3645.45100)

BECAUSE IT WOULD ELIMINATE TOO MANY ACTIVITIES

These areas should not be proposed for wilderness areas, this would eliminate the area from all activities except horses and hiking, they should have their own designation. (Individual, Denver, CO - #A841.25000)

Don't propose any more land for wilderness designation. It is a ban on man's first invention of note; the wheel. Keep the possibilities open. Don't lock out the future generations, and don't saddle future Americans with lots of rules and public debts, because that is a form of enslavement. (Individual, Burbank, CA - #A18027.25240)

The Idaho Outfitters and Guides Association does not support wilderness management agendas for roadless areas. Wilderness management for these areas would negate much of the recreation opportunity spectrum. Maintenance of trails and other management functions would become more difficult. Mountain bikes, hang gliding, snowmobiling, and affordable outfitted trips are examples of some of the many forms of recreation would be eliminated from Idaho's national forests invoking wilderness management strategies for all roadless areas. (Permit Holder, Boise, ID - #A29589.25240)

I understand that the Snake River and Palisades mountain ranges in Wyoming are designated as "Recommended Wilderness." What I understand this designation to mean is that this area will possibly be designated Wilderness, at which time recreational use of the area by heli-ski operators will be curtailed or terminated. Heli-skiing is a non-intrusive/non-destructive use for public lands. (Individual, Rye, NH - #A26682.25000)

BECAUSE IT WOULD ELIMINATE MOUNTAIN BIKING

A designation of wilderness for these roadless areas would *ban* bikes from using these trails. This would be the worst possible designation and is not acceptable to the mountain biking community. Mountain biking organizations have made huge progress in learning [and] applying appropriate trail design techniques, maintaining existing popular trails, and sharing trails in a socially acceptable manner. Mountain cyclists should not be isolated from other muscle-powered recreational users. Although mountain bikers agree that protection is needed for these roadless areas, a different designation from that of wilderness would be the most appropriate. (Individual, Woodland, CA - #A18071.25000)

BECAUSE IT WOULD RESTRICT STATE WILDLIFE MANAGEMENT FLEXIBILITY

DNR's remaining major concern is over the apparently automatic consideration by the FS of roadless areas for wilderness designation. . . . I want to take this opportunity to firmly state our concern over reduced management flexibility caused by wilderness designation. This apparently default process forces DNR to consider the wildlife management implications of wilderness rather than simply roadless designation for these Georgia tracts. Alternative long-term management options should be available for roadless areas that maintain their current characteristics, but provide more flexibility than wilderness. (State Agency, Social Circle, GA - #A22054.25240)

BECAUSE IT WOULD LOCK UP NEEDED NATURAL RESOURCES

Absolutely not. We should not designate any more wilderness. This should also apply to old growth. We cannot keep locking up our resources—known or yet to be discovered. The risk of being unable to feed, clothe, house, provide energy and provide quality of life for future generations is too great; wise use—yes, sustained yield—yes, BMPS—yes, environmental and science supported activities—yes, wilderness—no! (Business, McBain, MI - #A12006.25240)

BECAUSE IT IS ELITIST, FAVORING THE YOUNG AND WEALTHY

The roadless areas should definitely not be designated wilderness. Only the young and the rich can enjoy the wilderness, leave the forests for the elderly and the poor to enjoy. Every coolie and creek does not have to be accessed, but there should be some for every type of user. (Individual, Bozeman, MT - #A8826.25000)

BECAUSE THERE ARE ENOUGH WILDERNESS AREAS ALREADY

While I do not have a problem with some wilderness areas I have to question at what point does it become enough?. I do believe that there is either enough or very close to enough wilderness areas and shutting down more areas to where they become either wilderness areas or essentially wilderness areas is not needed. (Individual, Boulder, CO - #A4480.25000)

[8.] Congressional designation of a wilderness area takes Congressional action to reverse in the event the area is ever needed to be utilized for anything other than wilderness. Do not attempt to set aside any more large tracts of land. Currently, there are millions of acres of roadless designation in the U.S. This is enough. The balance of the forests should be managed under the multiple use concept, as Congress intended. An example would be the Wasatch-Cache National Forest. There are currently 460,000 acres set aside as wilderness. Resource users agreed in 1984 to this size of wilderness designation. This agreement was understood by all parties as being THE number of acres of roadless designation, even before the 1984 Wilderness Bill was passed by Congress, and ever since, the preservationists have been attempting to enlarge the wilderness boundaries with buffers, corridors, and with large tracts of inventoried roadless. Just because the Forest Service has inventoried a tract of land as roadless doesn't mean it is actually "Roadless," or needing special treatment. That is a preconceived error by the Forest Service. We know of areas which have been inventoried roadless that contain private land, early warning stations, natural gas plants, and many old logging or resource roads that are currently being used to access private land or used to access current Livestock Grazing allotments within the National Forest. Enough is enough please leave some forest for sensible renewable resource use and production. (Fire Warden, Uinta County, WY - #A15287.25240)

I personally feel that there is adequate Designated Wilderness already. A simply look at the percentages of land show that approximately 34% of all federally managed land is Designated Wilderness. This doesn't even include many millions of acres of National Park lands that while not Designated Wilderness, are managed as wilderness, or Wilderness Study Areas, which in most cases are managed as Designated Wilderness. However statistics show how few people actually utilize these areas. A balance needs to be developed, and I feel that we are far beyond a balance at the present time with Designated Wilderness winning out. (Organization, Huntsville, AL - #A13542.25240)

8. Should roadless areas selected for protection through forest plan revisions be proposed to congress for formal wilderness designation?

No. The protective provisions of the roadless conservation rule affect nearly three million acres of National Forest System Lands in Region V alone. Approximately 4.1 million acres within Region V are all ready within designated federal wilderness areas. The addition of three million acres of roadless areas managed as wilderness may result in more than a 40 percent increase in the amount of land managed as federal Wilderness throughout the Region, significantly impacting public access to these lands. The immediate protection proposal will result in almost 70 percent of all land within Alpine County being managed as federal wilderness. Consequently, in Alpine County and through the region, access to National Forest System lands will be significantly reduced for those unable to walk or hike, or user groups who desire other forms of transportation not allowed within areas managed as wilderness. (Elected Official, Alpine County, CA - #A8597.25240)

About 18% of Forest Service lands are currently designated Wilderness, more lands have been recommended as Wilderness and are currently managed to prevent impairment of wilderness qualities. Given the Forest Service's multiple-use mandate, 18% is an appropriate amount of Wilderness, and little—if any, more Wilderness should be designated. (Individual, Logan, UT - #A13482.25240)

In conclusion I would like to comment on the proposed 603 wilderness areas. I oppose any more wilderness areas, especially where existing roads exist. We, the public, have given up too much of our public lands already to special interests. (Individual, Bishop, CA - #A3683.25200)

1266. Public Concern: The Forest Service should not recommend additional specific areas for wilderness designation.

My state of Montana has an average yearly salary of approx $22,000 per person. We have lost logging, mining, and ranching as industries and are told we need to depend on tourists who want to "view wilderness and more wilderness." They can view what we've got. That's enough! (Individual, Kalispell, MT - #A1076.75200)

1267. Public Concern: The Forest Service should drop recommended wilderness status for roadless areas if Congress fails to act after a reasonable amount of time.

Wilderness recommendation should not be allowed to let a unit become defacto wilderness in perpetuity. Only Congress can designate wilderness. After a reasonable amount of time, such as a planning cycle, if Congress has not acted, managers must assume that Congress has rejected their recommendation and determine a long-term management direction for the unit other than wilderness. (Business, Lewiston, ID - #A7991.25000)

Identification of a unit of land as an inventoried roadless area must not become a de facto designation, requiring that it be managed forever in some kind of roadless limbo. A thoughtful and definitive decision as to how the unit will be managed must be made once and for all in the forest plan. If the decision is to recommend it for a designation as wilderness, that status must sunset if Congress fails to take action, its inaction in effect rejecting the recommendation. (Organization, No Address - #A8227.25000)

Wilderness Recommendation Criteria

1268. Public Concern: The Forest Service should follow the established legal criteria regarding recommendation of wilderness areas.

Refer to your policies dictated by Congress for designated Wilderness Areas and use them. (Individual, Bristol, TN - #A1024.25000)

The Forest Service has criteria for designating areas including wilderness areas and the forest plan should address those recommendations for designation. The unique roadless areas may be proposed for wilderness designation, however, most areas should be maintained as roadless in the Forest Plan due to the management flexibility that would provide. (State Agency, Phoenix, AZ - #A17678.25220)

I do not believe this question needs to be addressed. Present law and rules deal adequately with the question. (Individual, Newtown, PA - #A19257.25100)

FOREST SERVICE HANDBOOK

The primary type of evaluation of roadless areas should relate to developing recommendations of areas appropriate for Wilderness designation by Congress. The Forest Service Handbook currently includes an entire chapter (Chapter 7) devoted to outlining the factors that should be considered when evaluating inventoried roadless areas. Section 7.23b is devoted to the factors that should be considered. We believe these provisions are adequate for evaluation of roadless areas for wilderness in conjunction with administration of the roadless area conservation rule. (Civic Group, Roanoke, VA - #A1713.25210)

WILDERNESS ACT

The ALC believes that areas with wilderness values as defined by Sec. 2(c) of the Act and defined by forest planning should be recommended for classification by the President to Congress. Those areas not so recommended should be released for multiple uses as defined by the 1960 act and subsequent legislation. (Association, Coeur d'Alene, ID - #A11800.25000)

The Forest Plan should make the decision whether or not any area should be recommended to Congress for formal Wilderness designation, recognizing that the Wilderness Act defines clearly those attributes that must be present for such a designation. (Association, Fernandina Beach, FL - #A15466.25230)

1269. Public Concern: The Forest Service should use the Wilderness Attribute Rating System from RARE I and II if further evaluation is necessary.

These roadless areas have repeatedly been evaluated for wilderness attributes and found wanting. If any passive management is being considered this should be again evaluated using the Wilderness Attribute Rating System used during the RARE I and RARE II efforts. (Organization, Wenatchee, WA - #A22628.25200)

1270. Public Concern: The Forest Service should recommend roadless areas for wilderness designation based on location criteria.

AREAS THAT ARE ADJACENT TO EXISTING WILDERNESS

No formal wilderness designation should be given to any roadless area unless it is adjacent and contiguous with an existing wilderness. (Individual, Whitefish, MT - #A5102.25220)

Should roadless areas be proposed to Congress for Wilderness designation?. Yes, undoubtedly, some should. Most tracts of roadless lands border designated Wilderness and would only complement the function of wilderness. . . . We support the ongoing efforts of the High Uintas Preservation Council to add some roadless areas to the High Uintas Wilderness simply because it makes sense. Management would be simplified because there is already a prescription for managing wilderness. (Organization, Vernal, UT - #A20753.25220)

1271. Public Concern: The Forest Service should recommend roadless areas for wilderness designation based on ecological criteria.

AREAS WITH UNDERREPRESENTED LOWER-ELEVATION ECOSYSTEM TYPES

Little, if any consideration was given for ecosystem representation in previous Wilderness designations, an important factor for long-term sustainability of native species. As a result, 39%, 44% and 37% respectively of all the Pike San Isabel's (PSI's) alpine tundra, barren rock and spruce fir are in Wilderness areas, but only 9% of the PSI's pinion-juniper, 3% of the ponderosa pine and 1% of the sagebrush shrublands are in Wilderness. This skewing toward high elevation ecosystem types put lower-elevation species automatically in less well protected areas, and thus more vulnerable to population decline or potential extinction. (Organization, Denver, CO - #A8824.50100)

We have no confidence in the ability of local forests nationwide to adequately protect what remains of our federal roadless areas. While 427,000 acres of Pike San Isabel inventoried roadless areas are now Wilderness, they are primarily located at high elevations. Additional low-elevations lands must be incorporated in the Wilderness system so that plant and animal species which depend on them can also be protected. In addition only 15% of the remaining roadless areas disallow road construction, and many of the others have extensive motorized trails networks. It is important to protect roadless areas as now across the nation waiting for administrative process to inch slowly toward completion. (Organization, Littleton, CO - #A8829.25210)

Roadless areas need and deserve protection now, regardless of whether they are recommended, now or later, for wilderness designation. Roadless areas that possess values generally lacking in the wilderness system should be recommended for wilderness. Here in Colorado, there is very little acreage below elevation 8,000 feet in the National Wilderness Preservation System. Certain ecosystems are similarly underrepresented in the Wilderness system here. These include: pinyon-juniper, aspen, ponderosa pine, Douglas-fir/mixed conifer, mountain shrubland, and mountain grassland. (Organization, Denver, CO - #A12008.25200)

AREAS THAT CONTAIN ENDANGERED SPECIES

Very little, if any, land should be declared Wilderness. Only lands with clear-cut historical or TRUE species of endangerment (and not their falsely placed fecal matter) should be protected. (Individual, Humboldt, TN - #A464.25000)

AREAS THAT ARE ECOLOGICALLY SENSITIVE

Areas of special natural beauty or areas of particular sensitivity, e.g., riparian desert areas where endangered species thrive, should be proposed to Congress for Wilderness designation. (Individual, State College, PA - #A15450.25220)

AREAS THAT ARE 1,000 ACRES OR LARGER THAT ARE ECOLOGICALLY SENSITIVE

Some very sensitive inventoried roadless areas, 1,000 acres or more, selected for future roadless protection through the local forest plan revision process should indeed be proposed to Congress for Wilderness designation. The expansive Tongass area in Alaska and the small Quartzite Watershed area north of Spokane, Washington, are prime candidates for such proposals. (Individual, Chewelah, WA - #A5453.25200)

1272. Public Concern: The Forest Service should recommend roadless areas for wilderness designation based on size criteria.

AREAS OF LESS THAN 5,000 ACRES

I believe that all roadless areas (even those less than 5,000 acres) should be proposed to Congress for wilderness designation. The language of the Wilderness Act itself provides an adequate and eloquent rationale: Sec. 2. (a) "In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness. For this p4urpose there is herby established a National Wilderness Preservation System to be composed of federally owned areas designated by Congress as "wilderness areas," and these shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character." (Individual, Sitka, AK - #A15506.25210)

AREAS OF 1,000 ACRES OR MORE

The Roadless Area Conservation Policy is a good first step to protecting some of the roadless forests in Oregon. But even if the policy withstands congressional, legal and administrative challenges blocking its implementation, 3.1 million acres of roadless areas over 1,000 acres will not be afforded protections by the policy. For the forests included in the policy, logging, road building and other destructive activities could continue, albeit on a limited basis. For these reasons, it is essential that more protections be sought for Oregon's wild forest.

I urge you to do all you can to protect all roadless areas 1,000 acres and greater as Wilderness. Our few remaining pristine forests deserve the most permanent and comprehensive protection we can give them. Wilderness designation is the only way to ensure that these wild forests will remain wild for generations to come. (Elected Official, Multnomah County, OR - #A23662.25200)

AREAS OF 640 ACRES OR MORE

Roadless areas that are larger than 640 acres should be proposed for wilderness designation. Roadless areas smaller than 640 acres should be evaluated for wilderness designation or other status. (Individual, Petrolia, CA - #A27839.25220)

5,000 ACRES IN THE WEST, 1,000 ACRES IN THE EAST

Everything over 5,000 acres west of the Mississippi and 1,000 acres east of the Mississippi in designated roadless areas should be considered for wilderness listing. (Individual, Little Rock, AR - #A27507.25220)

1273. Public Concern: The Forest Service should recommend roadless areas for wilderness designation based on practical management criteria.

AREAS THAT ARE LARGE ENOUGH TO MAINTAIN THE ROLE OF FIRE WITHOUT THREATENING MANAGED AREAS

Wilderness consideration should only be given to areas of adequate size to truly be a wilderness where all natural and biological functions can progress without unduly influencing other managed areas. These functions must include the role of wildfire. The proposed wilderness must be large enough so that wildfire, under the planned prescriptions, can play its natural and historic role. (Individual, Evergreen, CO - #A19178.25200)

AREAS THAT CONTAIN NO ROADS

For the areas that truly do not have roads (which are few and far between in most cases) should truly be classified as wilderness with no fires, no motorized vehicles, no hunting, no fishing, etc. For the areas that actually have roads which you are attempting to classify as roadless, they should continue to be managed as they have in the past with the exception that more education for the user of the area is needed (the public who owns the land). (Individual, No Address - #A356.25220)

Wilderness areas designation is a big farce and should be stopped. Many wilderness areas have been established so as to appease special groups, they have been established for political ploys, and have even been established just to prevent anyone from accessing the areas across someone's back yard. Wilderness areas should be reserved for those areas that have no existing roads, are in fact pristine (and not just with potmarked desert hills eroded through the acts of nature or scrub brush that is nothing more than a fire hazard). (Individual, Maricopa, CA - #A3732.25000)

Another comment I have here is if a given area is going to be proposed as wilderness, why make it roadless first???? Let's just cut to the chase and do it now and do it right!!! If there are roads in a given area, then it is NOT roadless it is NOT wilderness and it should NOT be proposed as such!!! Wilderness has its place, but let's don't call an area wilderness if in fact it is not! I feel wilderness is far too restrictive by and large. If there are roads in a given area, then a I understand wilderness policy the land/area does NOT qualify! (Individual, Ogden, UT - #A590.25000)

1274. Public Concern: The Forest Service should recommend previously overlooked roadless areas for wilderness designation.

BASED ON CHANGES IN FOREST CONDITION, PUBLIC VALUES, AND SCIENTIFIC UNDERSTANDING

Contrarily to the tone and content in the ANPR, as well as general perceptions in the PSI, our organization, along with many others in Colorado, believe that these remaining roadless areas have great potential for Wilderness designation. On the Pike and San Isabel, we have identified at least 550,000 acres that meet all the Wilderness criteria used by the USFS. Most of this is found in the 669,000 acres of IRAs, and some is in adjacent and/or contiguous unroaded areas. While the Forest Service continues to believe that the findings of RARE II and decisions in the 1984 LRMP forever dismissed these areas as potential Wilderness, we respectfully disagree. Public perceptions, the science of conservation biology, new management priorities and techniques and evolving forest conditions have changed the very nature of evaluation of potential Wildernesses. (Organization, Denver, CO - #A8824.25200)

All roadless areas should be evaluated as to their wilderness potential and recommendations made to Congress for wilderness designation. Areas in particular, such as Pelican Butte, which were originally intended to be included in an adjacent wilderness area should be reevaluated for wilderness designation. (Individual, Klamath Falls, OR - #A5118.25220)

1275. Public Concern: The Forest Service should continually reevaluate roadless areas for wilderness characteristics.

MAKE NEW RECOMMENDATIONS EXPEDITIOUSLY

All Forest Service lands should be continuously evaluated for Wilderness characteristics. When found, areas should designated as wilderness in the most expedient manner. (Individual, Santa Fe, NM - #A18167.25220)

Management of Roadless Areas That Do Not Meet Wilderness Criteria

1276. Public Concern: The Forest Service should collaborate with organizations regarding management of areas not suitable for wilderness designation.

Some roadless areas should be proposed for formal wilderness designation. For other areas, the Forest Service should work with organizations such as the Alliance for the Wild Rockies, which is trying to establish connecting biological corridors for wildlife throughout the west, yet allow multiple use in some areas. Such joint ventures would encourage hunting, fishing, and other non-motorized outdoor recreational activities. (Individual, Tucson, AZ - #A872.25000)

1277. Public Concern: The Forest Service should maintain areas that do not qualify for wilderness under a roadless category.

Some should be wilderness and some should not. It has been said many times lately. There is great value in maintaining roadless lands as a category between wilderness and general roaded use. (Individual, Grangeville, ID - #A830.25220)

Wilderness designation. Wilderness offers the strongest protection for our remaining wildlands. However, we do not feel that wilderness designation is necessary for the protection of all roadless areas in light of the protections offered by the Roadless Rule. Decisions about recommending wilderness designation can, and indeed must, be made through forest planning. All roadless areas must be evaluated for potential wilderness designation during forest planning by law. The Roadless Rule does not interfere with this process. Roadless areas not selected for wilderness protection should be managed under forest plans in a manner consistent with the Roadless Rule, with additional protection from motorized off-road vehicles. (Organization, Washington, DC - #A18031.25000)

Where roadless areas are large or where they adjoin existing wilderness, they should be considered for wilderness designation. Otherwise, they should be managed for minimal interference in their own specific designation. (Organization, Washington, DC - #A18031.25220)

TO ALLOW MECHANICAL FOREST MAINTENANCE EQUIPMENT, BUT NOT ROADS OR RESOURCE EXTRACTION

The most precious of the 58.5 million acres should be designated Wilderness Areas. The rest of the 58.5 million acres should be designated “Roadless Areas,” where mechanical forest maintenance equipment is allowed but where roads or resource extraction are not allowed. In-good-faith obeisance to the spirit of the rulemaking-ecological preservation-should guide the drawing of policy details. (Individual, No Address - #A117.25220)

TO PROTECT THESE AREAS FROM COMMERCIAL DEVELOPMENT

All roadless areas do not need to be designated wilderness. Wilderness should be reserved for those special areas that have specific environmental resources that need specific protections. The current Roadless Area Conservation Rule would allow access, such as mountain bikes, that would be excluded by wilderness designations. We need to protect the forests from commercial development and destruction while allowing the American public to continue to use and enjoy their lands. (Individual, Reno, NV - #A5110.25220)

1278. Public Concern: The Forest Service should drop areas not eligible for wilderness designation from roadless status.

In the process of doing EISs of individual areas, wilderness status should be considered. If an area is found to be of wilderness quality it should be recommended to congress to be included in the wilderness system. If it does not qualify for wilderness status it should be dropped from roadless status. When this process is completed there should be no roadless areas. (Individual, Miami, AZ - #A880.25220)

IN ORDER TO FULFILL THE FOREST SERVICE GOAL OF MULTIPLE USE

Roadless area designation was a holding status, made during the 1980's to provide more time to determine whether or not they should be considered further for Wilderness status. Now, these areas should either be designated as Wilderness, for which most will not qualify, or put into the full planning process, so that the Forest Service goal of multiple-use can be fulfilled. (Elected Official, Plumas County, CA - #A4846.25220)

1279. Public Concern: The Forest Service should assign different designations to areas that do not qualify for wilderness status.

GENERAL FOREST

Everything that is not Wilderness should be "general forest." (Individual, No Address - #A14054.25000)

NON-MOTORIZED PRESCRIPTIONS CONSISTENT WITH THE ROADLESS AREA CONSERVATION RULE

Roadless areas are appropriate to consider and recommend for Congressional Wilderness designation. Wilderness offers the strongest protection for our remaining wildlands. However, we do not feel that wilderness designation is necessary for the protection of all roadless areas in light of the protections offered by the Roadless Rule. Decisions abut recommending wilderness designations can, and indeed must, be made through forest planning. All roadless areas must be evaluated for potential wilderness designation during forest planning by law. The Roadless Rule does not interfere with this process. Roadless area not selected for wilderness protection should be managed under forest plans in a manner consistent with the Roadless Rule, with additional protection from motorized off-road vehicles. (Organization, Washington, DC - #A22129.25000)

Relationship of Roadless and Wilderness Management

1280. Public Concern: The Forest Service should bear the burden of proof that roadless areas should be entered.

I don't feel that all of the remaining roadless areas should be made wilderness. I do feel, however, that the burden of proof should be shifted—from the public to the Forest Service. The public should not have to demonstrate the value of the roadless area to the Forest Service every time the Forest Service wants to build a new road. Rather, the Forest Service should have to demonstrate the value of a road every time they want to build a new road. Roadless areas would remain roadless unless extenuating circumstances caused a majority of public comments to change the roadless designation. By extenuating circumstances, I don't refer to some insect outbreak, development interests, or some other weak excuse for logging in roadless areas. (Individual, Nickelsville, VA - #A30521.25120)

1281. Public Concern: The Forest Service should manage roadless areas to preserve wilderness characteristics.

The law and responsible stewardship requires evaluation for official Wilderness status. Roadless areas must be managed as de-facto Wilderness. (Individual, San Jose, CA - #A6276.25100)

These roadless areas are among the last remaining tracts of de facto wilderness within USFS lands. While de facto wilderness lands are not managed as federal Wilderness Areas, as you well know, federal Wilderness Areas are created out of de facto wilderness lands. Less than five percent of the land mass of the United States exists as federally designated Wilderness Areas. The Roadless Area Conservation Rule

is a landmark rule because it sets aside a protected pool of de facto wilderness out of which future Wilderness Areas can be created. (Individual, San Jose, CA - #A17367.25200)

TO ENSURE THAT THEY CONTINUE TO QUALIFY FOR CONGRESSIONAL DESIGNATION

As presently constituted, the Rule allows for Wilderness considerations to continue through the normal administrative, planning and legislative channels. Implementation of the Roadless Conservation Rule would, at a minimum, insure that these areas would not be disqualified from future Wilderness designation by road construction or commercial logging. The important thing is leave options for Wilderness open, for once these areas are roaded they are potentially disqualified for this protection for perhaps hundreds of years. (Organization, Denver, CO - #A8824.25110)

Ultimately, when the individual forest plans are updated, the roadless areas with wilderness characteristics will be evaluated for wilderness designation. (36 CFR 219.17). Until that time, and with regard to the roadless areas that may be proposed for designation other than wilderness, the Roadless Area Conservation Policy should be implemented as promulgated in order to preserve the roadless values that currently exist. (Individual, Eugene, OR - #A15583.25100)

Good information is important to Congress when it makes decisions to protect areas under the Wilderness and Wild and Scenic Rivers Acts. Many areas in Colorado that are still roadless are worthy of protection and deserve this protection because of the uses and values these lands provide. Over thirty years ago the courts handed down the East Meadow Creek decision that said in some cases the Forest Service must reserve the final decision on wilderness designation for the Congress and could not pre-empt the options of the Congress by administrative fiat. The creation of RARE II after the inadequacies of RARE is another case where the courts found value and importance in how decisions were made about roadless lands. The Roadless Area Conservation Rule is a continuation of this traditions of conservative decision making in regard to this precious natural and economic resource. (Elected Official, Fort Collins, CO - #A13297.25000)

TO PREVENT OFF-ROAD VEHICLE USE AND MOTORIZED TRAILS FROM THREATENING RECOMMENDED WILDERNESS STATUS

The appropriate role of local forest planning is to implement the Roadless Area Conservation Rule across the forest and evaluate all projects within that context. We further believe that the local forest planning must consider immediate protection for some of these areas to protect their unique qualities from such things as environmental damage from off-highway vehicles and motorized trails, a particular problem across Colorado and the PSI. When the forest plan is revised, the Pike and San Isabel will be required to analyze citizen recommended and inventoried roadless areas for potential Wilderness designations. Since more than 500,000 acres of the IRAs meet all wilderness criteria, we are concerned that they may be disqualified unless they are protected now. (Organization, Littleton, CO - #A8829.25000)

BECAUSE RECREATION PRESSURES HAVE BECOME INTENSE AND DAMAGING

Maintain them as de facto wilderness under agency-wide protection. If this means that future administrations could change agency rules and put these areas at risk, then legislation needs to be pursued which would require Congressional consideration of these areas for official wilderness status before rule changes could take effect. In this scenario, Congress would be unable to “deselect” an inventoried roadless area. We need to avoid the creation of “billboarded” wilderness, because recreation pressures have become intense and damaging. (Individual, Flagstaff, AZ - #A5026.25200)

BY ALLOWING ONLY ACTIVITIES SUCH AS HIKING, HORSEBACK RIDING, AND HUNTING

The areas should be treated as wilderness areas allowing only traditional activities such as hiking, horseback riding and hunting. (Individual, Winchester, VA - #A378.25120)

BY MANAGING THEM AS WILDERNESS WITH RESPECT TO FOREST HEALTH TREATMENTS

Inventoried roadless areas should be managed similarly to wilderness areas when it comes to protecting them from severe wildfires and insect and disease outbreaks. (Individual, Laramie, WY - #A1.25200)

BY TREATING FIRES ONLY WHEN THEY THREATEN STRUCTURES OR HUMAN LIFE

Existing roadless areas should be managed like wilderness areas: where active fires threaten structures or human life, action may be warranted. However, any attempts to thwart the implementation of the roadless ban on the grounds of "forest health" are an obvious attempt to mislead the public as to the current administration's real aim—gutting the roadless ban. Insects and diseases are a natural part of forest ecosystems, and only become a major concern when the management objective becomes resource extraction, not ecological function. (Individual, No Address - #A5224.25220)

1282. The Forest Service should manage roadless areas to preserve wilderness characteristics.

BECAUSE WILDERNESS AREAS CONTRIBUTE TO THE SOCIAL, ECONOMIC, AND ENVIRONMENTAL VALUES OF A REGION

As for activities that should be allowed in roadless areas, the Forest Service should use management of Wilderness Areas as a guide. Many Wilderness Areas contribute greatly to the social, economic and environmental values of a region. We were in Pinedale, Wyoming, on our way to the Bridger Wilderness, we spoke to many local folks in a small restaurant who bent over backwards to suggest hiking routes, good fishing spots, or just a pretty place to see. (Individual, No Address - #A4523.25000)

1283. Public Concern: The Forest Service should manage areas recommended for wilderness designation to preserve wilderness characteristics.

Roadless Areas recommended for wilderness designation in forest plans should be managed to retain wilderness values and should be managed as Wilderness, under the rules and regulations of the National Wilderness System. (Organization, Boise, ID - #A20363.25230)

1284. Public Concern: The Forest Service should keep all roadless areas unroaded regardless of recommended wilderness status.

By law, forest plans must evaluate the wilderness potential of all roadless areas and make recommendations for wilderness designation by Congress. The rule allows the wilderness recommendation process to continue. Forest plans also designate roadless areas for continued roadless management, regardless of whether they are recommended for wilderness. The rule ensures that roadless areas will, at a minimum, be protected from road construction and commercial logging. Recommending roadless lands for additions to the National Wilderness System should not preclude immediate protections for these places. (Organization, Nevada City, CA - #A4941.25100)

Wilderness designation is preferable, with emphasis on greater connectivity of existing protected areas. But this is not to say that such decisions should be made on a "now or never" basis, i.e. current roadless areas should remain roadless, regardless of whether or not they are deemed appropriate for wilderness designation at this time. (Individual, Corvallis, OR - #A650.25200)

1285. Public Concern: The Forest Service should maintain inventoried roadless areas in the same condition as they appeared when inventoried.

No change in roadless protection can occur until Congress determines whether an area is unsuitable or suitable based upon prior recommendations to Congress. Under the forest plan, Inventoried Roadless Areas must be maintained in exactly the same condition as they appeared when inventoried. The agency has an equal obligation to preserve "suitable" characteristics and "unsuitable" (developed/nonwild) characteristics. (Individual, Moab, UT - #A15790.25100)

Each specific Inventoried Roadless Area should be managed individually by inventorying the needs to the area to attain or maintain good forest health, then implementing any projects which can meet the goals set in protecting forest health. The agency has a mandate to preserve Inventoried Roadless Areas in their exact condition as of the date of their designation as Roadless Areas. The 1964 Wilderness Act

and supporting case law requires the agency to preserve Congress' ability to act upon the "suitability" recommendations of the agency. The agency must therefore not only protect areas found "suitability" for Wilderness designation, but must also preserve areas found "non-suitable" for Wilderness designation. Activities which alter the "snap shot" of the IRA which lead to the agency's "suitability" recommendation are prohibited, whether those activities be permanent road construction or road decommissioning, obliteration, or closure. Therefore, the agency is not only permitted to conducted forest health projects, even those such as fuel load reduction through timber harvest, but is required to do so in order to preserve the exact composition of the area. (Organization, Chesapeake, VA - #A11804.25100)

Each specific Inventoried Roadless Area should be managed individually. The agency must preserve Inventoried Roadless Areas in their exact condition as of the date of their designation as Roadless Areas. Activities which alter the "snap shot" of the IRA which lead to the agency's "suitability" recommendation are prohibited, whether those activities be permanent road construction or road decommissioning, obliteration, or closure. Therefore, the agency is not only permitted to conduct forest health projects, even those such as fuel load reduction through timber harvest, but is required to do so in order to preserve the exact composition of the area. (Individual, Des Moines, IA - #A12587.45500)

1286. Public Concern: The Forest Service should manage roadless areas 5,000 acres or larger as wilderness and allow limited management activities in areas of less than 5,000 acres.

Roadless areas of 5,000 acres and greater should be managed just like wilderness areas. Areas of less than 5,000 acres should be prescribed burned and maybe some helicopter logging of understory to reduce fuel.

You cannot protect the forest from insect or disease, so management to prevent this is impossible. This has been used as an excuse for massive logging. In areas of 5,000 acres and larger, let nature take its course. In areas of less than 5,000 acres maybe some salvage by helicopter could be done without new roads.

Wildfire is going to happen no matter what you do for management. Allow some fires to burn under prescription and prescribe burn to reduce severity. (Individual, Thompson Falls, MT - #A5643.30100)

1287. Public Concern: The Forest Service should not manage inventoried roadless areas as de facto wilderness.

First and foremost, we do not believe that the presence or absence of a road creates a "special place" on the national forests. Areas without roads are not by definition wild or wilderness and should not in every case be managed as if they were. The ecological, physical, and biological attributes present in a particular place best define the values of the national forests. Roads, trails, or other improvements can improve or maintain these values. In many cases, these facilities are necessary if the values are to persist over time, such as in the case of maintaining certain wildlife habitat or access to reduce hazardous fuels. In addition, many of the inventoried roadless areas are not roadless. They have roads, water developments, transmission lines, and in some cases have been previously agricultural land. (Association, Terra Bella, CA - #A15588.45100)

1288. Public Concern: The Forest Service should not manage uninventoried roadless areas as de facto wilderness.

BECAUSE IT IS CONTRARY TO CONGRESSIONAL INTENT

To manage these lands [uninventoried roadless areas] to maintain options for further roadless inventory is contrary to the Congressional intent relative to roadless areas as expressed during the 1981 designation of wilderness in California. We note the following statement in the Committee Report:

The fact that the wilderness option for roadless areas will be considered in future planning raises the hypothetical argument that the areas therefore must be managed so as to preserve their wilderness attributes so that these may be considered in the future. Such an interpretation, however, would result in

all roadless areas being kept in de facto wilderness for a succession of future planning process. Such an interpretation is obviously incorrect, and if applied, would completely frustrate the orderly management of nonwilderness lands and the goals of the Forest And Rangeland Renewable Resource Planning Act. (Committee on Interior and Insular Affairs, 97th Cong. 1st Sess. Report No. 97-181, p. 45) (emphasis added). See also Committee on Energy and Natural Resources, 96th Cong. 2d Sess., Report No. 96-914, p. 26. (Elected Official, Roseburg, OR - #A11811.25110)

1289. Public Concern: The Forest Service should only consider roadless units that have been recommended as wilderness but rejected by Congress through inaction.

This planning effort to address roadless units should be final, ending the limbo status these units have languished in since RARE I. The only units to be addressed in the future should be those recommended as wilderness, but rejected by Congress through in-action. Otherwise management of these units should be addressed in same fashion as other lands during forest plan reviews and revisions. (Individual, Frenchtown, MT - #A11887.45400)

Roadless Designation

Summary

General Comments – The comments provided by the public about the advisability of creating a separate roadless designation echo the broader body of comment about whether or not a national roadless rule should be implemented. In the context of answering Question 8, some ask that the Forest Service clarify to the public that designating roadless areas will not preclude future action by Congress to declare them wilderness. Those who ask that a national rule not be implemented assert that Congress should grant express authority to the Forest Service before any roadless designation is created. Others state that local government consent must be obtained prior to any such designations in any lands covered by the Weeks Act (see also Chapter 5: Forest Management: Roadless Areas General: *Authority for Roadless Area Management*). These respondents also assert that a roadless designation amounts to a de facto wilderness designation by the Forest Service; while those who ask that a national rule be implemented maintain that the Roadless Area Conservation Rule does no such thing, since many more activities are allowed under the Rule than under the Wilderness Act. Some assert that the rulemaking should be dropped because these areas have not been considered or ignored by Congress for official wilderness status. Others assert that this reasoning is not valid due to the slow nature of the political process and the fact that wilderness recommendations follow from the same local planning process that has also so far proved unable to protect roadless areas from entry. Some suggest the Forest Service adopt another term besides “roadless” because it has become too great a political hot potato.

Various respondents also assert that the Forest Service should expand existing roadless areas by restoring and rehabilitating many roaded portions of the National Forest System, especially the roaded portions of inventoried roadless areas. In particular, the low percentage of roadless areas in the eastern United States and in the Appalachians are cited as reasons to broaden a national rule. There are others who believe that a “return to roadlessness” is inappropriate, and some ask that the Agency reduce the size and number of roadless areas to be covered by it.

Adequacy of Analysis – Some comments in this section overlap with those in the section on roadless area designation criteria (below) because they emphasize the need for thorough evaluation of roadless areas or provide suggestions for coordinating this effort with forest plan

revisions. A few individuals suggest that large contiguous tracts of wild forest habitat should be reestablished in order to allow natural processes to function, and ask that this be a prime focus of large scale analysis in future planning. Other respondents provide very specific observations regarding the adequacy of the data and analysis used in the Roadless Area Conservation Rule Draft and Final EISs. Some assert in particular that these analyses lack accurate data on private inholdings, school trust lands, and mineral rights within inventoried roadless areas. An organization states that the amount of roadless acreage currently assigned to protective categories in Oregon is inflated, while several county commissioners and other individuals assert that the Forest Service has under-represented National Forest System lands in categories that limit intensive human uses. Other county commissioners request that Appendix C be revised to acknowledge that many inventoried roadless areas have already been determined to be unqualified for wilderness recommendation by the Forest Service.

Designating Roadless Areas – Many responses to Question 8 are phrased as a simple statement for or against the advisability of a new roadless management prescription. Other respondents address this topic elsewhere in their comments in the context of broader management direction, for instance as the suggested alternative for management of roadless areas that do not qualify for wilderness recommendation. Some respondents believe that a roadless management category is appropriate—although others state that a wilderness designation would be preferable—or alternatively any existing management category that is consistent with a national rule. Respondents also conclude that creation of a new roadless category is inappropriate, although some do recommend a Backcountry Recreation Area prescription. (See also the section below on designating other new management categories.)

Those who recommend a roadless prescription cite many reasons for employing such a prescription, including the assertion that this is a means to resolve ongoing wilderness controversies. Because this prescription could allow activities prohibited in wilderness areas such as mountain biking, as well as administrative tools such as chainsaws, many state that this category is needed and could be supported by a broader array of recreationists. Some individuals recommend the creation of multiple roadless categories with varying sets of uses in order to best respond to local conditions. Others ask that local forest managers be able to add further prohibitions to roadless management categories. Finally, some ask the Forest Service to create a dynamic roadless designation that adopts an adaptive management approach to best respond to changing environmental and social conditions over time.

Others recommend that a new roadless management prescription not be employed and assert that a separate management category is unnecessary, as well as respondents who generally ask that a national rule not be implemented and therefore also recommend that no type of separate roadless category be employed. Further reasons cited for not creating a roadless category include the belief that roadlessness itself is not sufficient justification for it—that conditions vary too greatly between roadless areas for a single category to be effective; that it will strain agency budgets; and that wilderness areas themselves are not being well managed, so a roadless designation will drain resources and result in similar problems. Finally, some say that road management budget problems should not be used as the justification for roadless designations, and assert that other solutions to financial issues should be pursued.

Roadless Area Designation Criteria – Some respondents discuss the overall design and selection of criteria for roadless area designation. A common theme is the request for a clear and specific set of tools to be used in the roadless evaluation process. Others critique the current list

of roadless evaluation criteria found in the Forest Service Handbook and suggest alternatives to be included. Other respondents suggest creating a method for weighting the factors during decisionmaking. One Organization asserts that the current criteria do not work well in the eastern United States, and suggests amending the handbook to take into consideration the specific situations in these regions. Some say that the current criteria reflect wilderness recommendation decisionmaking, but that the Roadless Area Conservation Rule has a different goal from this process. Therefore, they suggest modifications to the handbook criteria in order to meet the goals of the Rule, such as removing the "sights and sounds" criteria and unlinking solitude considerations from recreational opportunity spectrum core area sizes. Finally, a number of respondents ask the Forest Service to make sure that the most up-to-date mapping is used, and that data is ground-truthed for accuracy during the roadless delineation process.

Comments about the criteria that should be used in the roadless designation process vary. Inventory status is one criterion often mentioned by respondents. While some state that a national rule should be limited to inventoried roadless areas only, others say that uninventoried areas should also be covered under a national rule.

Size is another criterion that is widely mentioned in public comment. Some urge the Forest Service to expand the criteria for total acreage to include areas less than 5,000 acres, often citing the acreage cutoff that they consider to be appropriate, such as 1,000 acres. The same respondents also ask that smaller unroaded and uninventoried areas be considered for protection. Other respondents assert that smaller roadless areas should not be considered for protection; one agricultural association suggests that no areas smaller than 10,000 acres should be included. These people say that roadless areas smaller than 5,000 acres, especially uninventoried acres, should not qualify for protection.

Others suggest that acreage alone is less important than proximity to other protected areas, such as existing wilderness areas or National Park Service lands. Still others believe that relative distribution of roadless areas by forest and region should be taken into consideration, with the goal of better balancing the distribution.

Some respondents state that decisions should be based primarily on ecological characteristics, asserting that the current National Wilderness System does not adequately represent many ecotypes, especially those found at lower elevations.

Infrastructure and historic human uses are also frequently mentioned as criteria by which to evaluate roadless areas. Respondents ask that the Forest Service ensure that any inventoried roadless areas with existing roads or other infrastructure be excluded from the Rule. Some request that any roadless areas adjacent to private property be excluded, while others say that any areas with valuable natural resources should be disqualified. Several add that any existing infrastructure should not disqualify a roadless area from protection, especially if the roads are user-created or have been closed. Others request that roadless areas be included for protection despite historic motorized use of a given area, and some ask that roaded areas be rehabilitated and returned to roadless status.

Roadless Designation General

1290. Public Concern: The Forest Service should clarify that designating areas to a roadless management category does not preclude future designation as wilderness.

Question #8—This question is confusing. I would offer forth that the designation of any tract of forest as a "roadless area" should not be construed as to prohibit its future designation as a wilderness area. (Individual, No Address - #A7184.25000)

1291. Public Concern: The Forest Service should implement a national roadless rule to maintain wild and scenic river eligibility for streams in roadless areas.

A protected forest has protected streams. The river we cross when entering our land is the upper Hoback River. Two segments of it have been found eligible for inclusion in the National Wild and Scenic Rivers System. The higher segment is eligible for the designation of Wild. Altogether, segments of more than 30 streams on our Bridger-Teton National Forest have been found eligible. The ones eligible for Wild are, by necessity, located in roadless (if not Wilderness) areas. Roadless areas protect the criteria that identify Wild NW and SR candidates. (Individual, Bondurant, WY - #A15465.25350)

1292. Public Concern: The Forest Service should not create special roadless designations without legislation from Congress.

Those areas with wilderness values as defined by the act of 1964 should be so recommended to Congress by the President. Under the forest plan these areas can be managed for their wilderness values until Congress acts. Areas not meeting the values defined by Sec. 2(c) of the act should be managed under the Multiple-Use Sustained Yield Act of 1960 and other authorizing statutes. The forest plan should recognize that there are areas requiring special management; however, there should be no specific designation for roadless areas without legislation by Congress. (Individual, Moscow, ID - #A5380.25320)

1293. Public Concern: The Forest Service should obtain the consent of local counties before designating any lands purchased under the Weeks Act as roadless.

The DEIS (3-13) noted that the Weeks Act of 1911 allowed the Forest Service to purchase lands in the Eastern United States, however note that lands were also purchased in Oregon under the same authority. The Weeks Act is particularly relevant to this decision in that lands that were acquired under the Weeks Act were acquired only with the consent of the affected counties, which consent was given with the understanding these lands would be used for commodity production and in turn a 25% return to the counties. Prior to placing any of the Weeks Act lands into roadless or unroaded categories under this action the Forest Service should obtain the consent of the counties. (Elected Official, Roseburg, OR - #A11811.25000)

1294. Public Concern: The Forest Service should not create de facto wilderness through roadless area designation.

In 1964 the Wilderness Act was passed and signed into law. Congress required that the Forest Service and the Bureau of Land Management inventory their lands and recommend to Congress the areas that should be wilderness. This was done. Now comes Clinton and makes de facto wilderness by declaring roadless areas. This is wrong. (Individual, Miami, AZ - #A880.25200)

Wilderness designation and public lands management are the responsibility of the U.S. Congress. Implementation of the proposal of lock up millions of acres, including roaded lands, will for all practical purposes create de facto wilderness. Science cannot be used for justification of such action. Sound science is not biased and is not based on unchallenged biological opinions. Under current law the Forest

Service and BLM are mandated to consider the heritage, customs and culture of communities adjacent to public lands. They are still mandated to be "stewards of our resources," not "restorers of some utopian concept of what those resources once were." (State Representative, State of Montana - #A18045.25110)

1295. Public Concern: The Forest Service should emphasize that the Roadless Area Conservation Rule does not create de facto wilderness.

BECAUSE FAR MORE ACTIVITIES ARE ALLOWED

The Roadless Area Conservation Rule prohibits road construction, reconstruction and timber harvest (with exceptions) within inventoried roadless areas, while excepting road reconstruction needed for road safety improvement and Federal Aid Highway projects. This is considerably different from management direction associated with Wilderness Areas. A great many there management activities may be allowed in roadless areas that would otherwise be prohibited in Wilderness Areas.

The Rule, therefore, is not a substitute for Wilderness designation. The Rule provides direction for road construction and timber management activities for roadless areas that are not designated or recommended for Wilderness designation. Roadless Areas that are identified in the Roadless Area Conservation Rule as well as additional areas that may be identified in future plan revision processes should be managed under prescriptions consistent with the prohibitions and exemptions defined in the Rule, and they should be evaluated for recommendations to Congress for inclusion in the Wilderness Preservation System during each plan revision cycle as required by law. (Organization, Damascus, VA - #A17723.25100)

1296. Public Concern: The Forest Service should consider that since many roadless areas have not been recommended for wilderness, a national roadless rule is unwarranted.

ON THE NATIONAL GRASSLANDS

While the Forest Service emphasizes that the National Grasslands have been studied for wilderness since 1972, the Forest Service must also acknowledge that each and every time the agency itself recommended against wilderness management. This is a highly significant fact that supports the position of the counties that no wilderness designation or roadless management is appropriate. The public record provided information omitted by the Forest Service proving that there has been no change in the facts or resources. The Forest Service's unstated change in policy cannot make roaded lands roadless, cancel mineral leases and royalty rights, or revoke easements and public roads. These lands simply do not meet the statutory definition of roadless or wilderness and must be managed consistent with the purposes for which the United States originally acquired these lands. (Organization, Denver, CO - #A21358.25240)

1297. Public Concern: The Forest Service should reject the argument that many roadless areas do not deserve protection under a national roadless rule.

BECAUSE THEY HAVE NOT YET BEEN RECOMMENDED FOR WILDERNESS

Assertion: many inventoried roadless areas were not recommended for wilderness. This is plainly true but irrelevant to Roadless Rule revision for three reasons. First, the Rule does not create wilderness, allowing as it does many activities and forms of management, including ORV use. Second, protection as wilderness is a reason not to protect (redundantly) through administrative rule rather than a reason to do so, so the failure to protect as wilderness cannot, analytically, be a reason against administrative protection. And third, the wilderness recommendations were themselves a product of the same NFMA planning process whose shortcomings necessitated the Roadless Rule, so their failure cannot serve as a basis for rejecting the Rule. (Organization, Olympia, WA - #A20145.25200)

1298. Public Concern: The Forest Service should follow the model used in the Olympic National Forest Plan.

WITH RESPECT TO ROADLESS AREA DESIGNATION AND MANAGEMENT

I was a participant in the preparation of the Olympic National Forest Plan in 1978-1980. We identified the roadless areas on the forest that met the criteria for potential Roadless Area designation at that time. We attempted to display the characteristics of these areas and the potential environmental effects of designating and managing these areas under the Roadless Area classification. I believe that this approach is still valid and appropriate for these areas. (Individual, Olympia, WA - #A278.45100)

1299. Public Concern: The Forest Service should use other terms instead of "roadless."

USE "RESERVE"

If the Forest Service feels it must have a separate name or a transition term, lets refer to the land as "reserve" instead of "roadless." (Business, McBain, MI - #A12006.25300)

USE "WILD"

On a secondary note, let's start calling these areas "wild" instead of "roadless." The roadless designation still defines these pieces of wild country in relation to vehicles and our ability to gain access. Let's show the wild some respect. It is worth talking about and loving in its own right, not simply because there aren't any roads there. (Individual, Jackson, WY - #A16263.25300)

1300. Public Concern: The Forest Service should increase roadless areas.

Please do not amend rules about roadless forests to allow road building, logging etc. On the contrary, I feel roadless areas should be expanded. Carving up roadless areas doesn't make sense even to Republicans like me. (Individual, Lancaster, PA - #A7030.10150)

I urge you to seek other areas that may also qualify as roadless and to extend protections to them. (Individual, Lansdale, PA - #A611.10160)

BY REMOVING ROADS IN CURRENTLY ROADED, HIGH INTEGRITY AREAS TO MAXIMIZE THE BIOLOGICAL AND ECOLOGICAL IMPORTANCE OF THE FINAL SUITE OF PROTECTED AREAS

To maximize the biological/ecological importance of the final suite of protected areas, the roadless policy should require the use of carefully prioritized road removal - followed by inclusion in the roadless protection program - for all high integrity areas.

In other words, we strongly request that the universe of areas to be considered for final roadless protection not be limited to those areas currently roadless, but include those areas that if restored to roadlessness would achieve the greatest biological and ecological integrity should be considered for immediate road removal followed by inclusion in the roadless area protection program. (Business, Coarsegold, CA - #A1589.45400)

BY EVALUATING OTHER UNROADED AREAS FOR POSSIBLE ROADLESS DESIGNATION

The regulations should provide authority for Forest Supervisors to evaluate other areas for consideration as Roadless designation and management only in the case where such areas are "unroaded". 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 - #A11804.45512)

BY MAKING ROADLESS AREAS AS LARGE AS POSSIBLE

The real problem is not in giving protection to these ancient remnants. The real problem is that they are not large enough. In every case, they were reduced in size because of specious ideas about buffer zones, and what constituted roads. Every one of the areas in the two Carolinas should be expanded to bring their boundaries out to the nearest roads that presently are in daily use. The guiding principle of the

Forest Service should be how can it make these areas as large as possible; not how can it reduce them in size as much as possible. (Individual, Walhalla, SC - #A6292.45300)

BY RESTORING LANDS TO THEIR ROADLESS CHARACTER

A key element has been entirely missing from your questions and from the Advanced Notice in particular. At no point do you address the issue of rehabilitating former roadless lands to return them to an essentially roadless character. The national dialog concerning roadless areas is inherently flawed if it does not take into account the desirability of establishing procedures and mechanisms for identifying areas to be converted back to a roadless status. Public resources would be far better spent on increasing our bank of roadless lands than in meddling with the remnant of roadless that remains. Obvious candidate areas for such rehabilitation include lands that were identified as roadless in RARE II but have since been degraded by logging or similar intrusions. Other obvious candidates would be relatively small areas of disturbance that separate existing roadless areas, especially when some of those roadless areas are below 5,000 acres in size. Until we start examining in earnest the need to expand the amount of our National Forests that is fundamentally roadless, we will only be looking at half of the question. (Individual, Pendleton, OR - #A30482.45000)

Our property is bordered on three sides by the 1.1 million acre Winema National Forest. Of that 1.1 million acres a mere 32,200 acres or 2.97% would be managed under the Roadless Area Conservation Rule. It is my belief that this is not enough, especially given the fragmented and disconnected nature of roadless areas in the Winema. Steps should be taken to restore National Forest Lands wherever possible to connect these smaller roadless areas. The Winema should draft a long term plan which would increase land managed under Roadless Area Conservation to 10% if its total area. Water quality and quantity is the most important issue in the Klamath Basin. Pelican Butte is a Teir II Watershed and is recognized as a significant source of the highest quality water entering Upper Klamath Lake. It is also a critical element in the ecological health if the Upper Klamath Marsh and Wildlife Refuge. Pelican Butte would also become the largest continuous roadless area in the Winema National Forest and must be provided the highest level of protection afforded under Roadless Area Conservation. (Individual, Klamath Falls, OR - #A4970.45622)

1301. Public Concern: The Forest Service should address the low percentage of roadless acreage in the southern Appalachians relative to the national average.

In Southern Appalachians generally, the roadless areas inventoried by the U.S. Forest Service comprise only 15 percent of national forest land. That's well below the national average of 31 percent. The Southeast is one of the fastest growing regions, putting more people pressure on national forests than anywhere else in the country. In this region the growing dilemma is more people clamoring for use of the national forest, but fewer acres to accommodate them. (Civic Group, Nashville, TN - #A10552.10111)

1302. Public Concern: The Forest Service should not expand roadless areas by restoring roaded areas.

The concept of **reversion to roadless** as described by Mr. Shea in his published article and as written to me by staff of HCCA is contrary to the spirit of this process. (Individual, Littleton, CO - #A13845.45100)

1303. Public Concern: The Forest Service should reduce the number and size of roadless areas proposed.

"Cut back on the number of 'roadless areas.' Do we really need as many as proposed? Don't be so 'stiff' on not allowing roads in 'roadless areas.' You can 'soften regulation' if you choose." (Individual, No Address - #A834.45100)

I oppose all roadless areas as they block use from motorized trail users. Please reduce the size of the existing roadless areas and do not create any more. Please do not enact any of the 'Clinton roadless areas.' (Individual, White Salmon, WA - #A16469.10000)

Adequacy of Analysis

1304. Public Concern: The Forest Service should evaluate roadless areas to see if they are large enough to serve as viable repositories of our natural heritage.

PLACE EMPHASIS ON ENLARGING OR LINKING ROADLESS AREAS THAT ARE TOO SMALL TO SUPPORT HEALTHY FORESTS

How should inventoried roadless areas be managed to provide for healthy forests? After a century of misguided policy, it is nearly impossible for human intervention to restore the forests to their former health. The best we can do is leave them be. Eventually nature will restore a balance, if the roadless area is large enough. Roadless areas should be evaluated to see if they are large enough to serve as viable repositories of our natural heritage. Emphasis should be put on enlarging or linking roadless areas that are too small to support healthy forests. (Individual, Albuquerque, NM - #A13459.30100)

1305. Public Concern: The Forest Service should include assessments that would qualify or disqualify each inventoried roadless area for such status.

AS PART OF EACH FOREST'S NEXT SCHEDULED FOREST PLAN REVISION PROCESS

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)

1306. Public Concern: The Forest Service should ensure that the roadless area evaluation process accurately presents land ownership and mineral rights information.

As further evidence that process alone will not result in better decisions within the Forest Service, one need only look at the FEIS treatment of the roadless conservation areas. In 1987, when the Forest Service issued the Custer Forest Plan, the Forest Service identified both inholdings, such as state school sections and mineral rights, and roads. The 1999 Draft Plan Revision and the 2001 FEIS completely omit these significant interests which would otherwise disqualify these areas for roadless management. The Bell Lake RCA was described as having no inholdings, FEIS, App. C 28-34, while the Custer Forest Plan shows that there are 365 acres of mineral rights and 1,120 acres of state lands. Custer FEIS, App. C 241-250. These interests still exist within the Bell Lake RCA but are omitted from the FEIS.

The extensive inholdings and mineral rights, as well as oil and gas leases, directly affect any determination that these areas can be managed for wilderness or to protect their natural qualities. While the roadless rule did not do a site-specific analysis, the DPG FEIS claims to have done so. Unfortunately, the DPG FEIS omits many of these factors. Process alone will [not] result in all of the information being considered. (Organization, Denver, CO - #A21358.45618)

1307. Public Concern: The Forest Service should correct errors in forest roadless statistics that inflate the acreage of inventoried roadless areas and non-motorized categories.

Oregon Cascade Roadless Area. The FEIS assumes that 75,000 acres of the Umpqua are designated inventoried roadless areas. This is incorrect. The 75,000 acres include the Oregon Cascade Recreation Area. In the Umpqua NF, the OCRA outside wilderness is 35,000 acres—almost half of the Umpqua's

claimed "designated roadless." However, of these 35,000 acres in the Umpqua, 26,100 acres or open to motorized vehicle all winter (zone 3, 5, and 6) and 16,700 acres are open to motorized vehicles all year long (zone 3 and 6) Of the 75,000 acres that the Umpqua NF claims is designated roadless, almost one quarter sustains motorized vehicle traffic all year long—on and off designated roads *increases* in "roadless" areas.

Clearly to properly analyze the effects of protecting roadless areas, the Umpqua National Forest must correctly assess its current roadless area figures. These 26,100 acres in the OCRA are not currently protected. The Proposed Rule is our best opportunity to afford the protection they not only deserve and the protection that the Umpqua National Forest claims they already have. (Individual, Roseburg, OR - #A19127.45620)

1308. Public Concern: The Forest Service should accurately list all National Forest System acreage included under management categories emphasizing environmental protection.

TO ALLOW THE PUBLIC TO MAKE INFORMED COMMENT

Page 3-1 of the DEIS states that 28% of the National Forest System is within inventoried roadless area, 22% is within Wilderness, National Monument, Wild and Scenic River or some other similar designation that the remaining 50% is managed for other uses which by implication includes road construction and reconstruction. This DEIS statement is misleading in that it ignores that the majority of the forests in Oregon are managed as late succession reserves, spotted owl habitat, riparian buffers and other similar land classification. To present an accurate picture of the land management status, it would be more appropriate to include all land management [in] each of these classifications. Absent this information the public does not have the opportunity to knowingly comment on the proposed action. (Elected Official, Roseburg, OR - #A11811.25000)

1309. Public Concern: The Forest Service should revise the Roadless Area Conservation Rule Final EIS Appendix C to acknowledge that many roadless areas do not qualify for wilderness status.

Appendix C of the FEIS does not acknowledge that the Forest Service made specific findings that these units did not have wilderness characteristics and did not qualify for wilderness. This was true for each of the roadless conservation areas. The FEIS omits this material information and fails to address how these badlands could be disqualified from wilderness due to roads, state lands, and range improvements and now qualify when these interests are still there. (Elected Official, McKenzie County, ND - #A27737.25100)

1310. Public Concern: The Forest Service should recognize that science does not support the idea of resource protection through roadless designation.

The idea of increased resource protection through roadless designation is unrealistic. Past practices and current science demonstrate that roadless areas do not ensure proper land stewardship. (Association, Boise, ID - #A20607.14500)

Do Designate Roadless Areas

1311. Public Concern: The Forest Service should remove all wilderness designations and use a modified roadless designation.

Remove all 'Wilderness' designation, and use a modified 'roadless' designation. (Individual, No Address - #A834.25000)

1312. Public Concern: The Forest Service should manage roadless areas under a specific roadless management designation.

DO NOT designate further wilderness. Should be maintained under a specific designation for roadless area management under the forest plan. (Individual, Brimley, MI - #A3659.25240)

I favor a new type of designation if protection is needed from resource extraction—call it a "wild lands protection area" or name of your own choosing. In such a designated area, all forms of recreation are permitted but not resource extraction. The only logging permitted is to maintain forest health. (Individual, Palmer Lake, CO - #A23361.25300)

TO RESOLVE ONGOING WILDERNESS CONTROVERSIES

Anytime you involve Congress you get into political posturing, egomaniacs, vote trading, power trips and high-paid lobbyists who do not represent the public. Wilderness designation does not protect an area from development. It also can be undesignated by a less environmentally friendly Congress or president (like Mr. Bush). It is best to leave the designation locked in for as long as possible under the forest plan. (Individual, Anchorage, AK - #A5342.25000)

ARRA prefers that any areas identified for future roadless protection should be maintained as a specific designation through the local management plan for each National Forest. Wilderness designation debates in Congress are often controversial and once designated, it is very difficult to revisit an issue. Keeping the designation within the management plan for each forest allows more rapid resolution while at the same time allowing for further refinement in future years. (Organization, Washington, DC - #A5069.25340)

Assuming that we ever return to a 10-year planning process, areas remaining roadless under the designated uses of a forest plan will be just that: roadless. Just like elk habitat will be elk habitat. Why treat the two differently?. If the purpose is to "preserve the Wilderness option" (which is unfortunately often an unspoken but key issue in this debate) then we again create for ourselves a half-pregnancy that does nothing to help solve the legal swamp we're in.

The rules, quasi-rules and pseudo-rules that have invaded our national forest management system have all the attributes of the dense, spindly thickets that many of those forests have become. The same approach to clearing up both is called for, namely, the active implementation if established, firmly grounded, and clearly articulated legal and scientific principles, leading to a far higher degree of certainty in the roles that Forest Service professionals are called upon to play. (Individual, Spokane, WA - #A17819.25100)

TO RESOLVE PROBLEMS OF COMPETING INTERESTS

With regard to competing values, an effective way for the Forest Service to manage lands for users with competing views is to provide different designations of land. Most of the conflict arises over an attempt to make public land everything for everybody. The roadless initiative represents an excellent solution to this problem. It basically says that we will take this portion of Federal land and manage it in a manner consistent with the resource values that this land provides. Land that already has roads, developed campgrounds, or active logging will obviously be managed in a different manner. Designating land to serve specific management goals rather than trying to manage all land for all uses is the only way to serve all user groups effectively. (Individual, Seattle, WA - #A17843.15160)

1313. Public Concern: The Forest Service should manage roadless areas under a specific roadless management designation.

WHICH WOULD ALLOW MECHANIZED RECREATIONAL ACTIVITIES NOT PERMISSIBLE IN WILDERNESS AREAS

Although mountain bikers agree that some protections should be afforded these special Roadless Areas, and certainly our trail experiences are enhanced by single track trails, wildlife and forest qualities of the

areas, we are fully aware that wilderness designation would BAN us from riding on these trails. This would be unacceptable to the mountain bike community. Our impacts are no more than an equestrian's or a hiker's. A pack train of several horses or dozens of hikers on a poorly designed or un-maintained trail can cause severe damage and any erosion problems can detract from the natural resources. The mountain bike community has made huge efforts in learning trail design, in maintaining existing popular trails, and in sharing trails in a socially acceptable manner. Wilderness designation shuts the door on these interested, knowledgeable trail users who've been collaborating successfully for years with the local forest staff. A different designation, which would afford certain protections for these roadless areas, short of designating them wilderness, would be a win-win situation for the forest and for a large recreational community. (Organization, Boulder, CO - #A17252.25240)

Some areas should be designated wilderness areas. However, a designation of roadless that could allow mechanized but not motorized recreation depending on the environmental concerns of the area might be plenty of protection. And again, maybe some roadless areas should be closed to all recreation. (Individual, Silverthorne, CO - #A28101.25310)

8. **Designating Areas.** I think that Inventoried Roadless Areas should be managed separate from wilderness and therefore should be granted their own land designation—less protective than wilderness (in that bikes should be allowed), but more protective than non-roadless national forest land. (Individual, Dallas, TX - #A17005.25300)

WHICH WOULD ALLOW SOME ADMINISTRATIVE ACTIVITIES NOT PERMISSIBLE IN WILDERNESS AREAS

While roadless areas may have many of the same qualities as wilderness, they are not identical. For instance, an area may be roadless but still allow access by planes or helicopters for management purposes consistent with the area, such as a prescribed burn, removal of invasive species, or studies of radio-collared wildlife. Therefore, roadless areas need to be considered as a designation separate from wilderness and one that is entirely within the authority and mission of the Forest Service. (Organization, Anchorage, AK - #A17358.25000)

I do not believe that all roadless areas need to be managed as official big "W" wilderness areas. I believe there is room for some areas to be managed in some sort of special roadless management designation. Such rules might allow for the use of some motorized equipment within roadless areas. For example, I would not be completely opposed to the use of chainsaws for trail maintenance or other administrative purposes as long as the "roadless" character is maintained. I believe, the final rule allows some options that would not be permissible in an officially designated wilderness area. (Individual, Moscow, ID - #A4871.25000)

In general roadless areas should be managed as de-facto wilderness, including prohibition of mechanized access except for narrowly drawn exceptions for the legitimate direct use of the managing agency. For example, use of chain saws or mechanical "toters" for trail maintenance purposes could be permitted. (Individual, Seattle, WA - #A17261.25200)

I prefer the idea of Wilderness areas that have roadless areas around them. Thinning can occur in the roadless areas . . . some roadless areas are critical wildlife corridors between wilderness areas. We need both types of areas with different management, but that remain roadless and non-motorized, except maybe helicopter logging or those new tree cutting/removal machines that don't need roads but can cut and remove weak trees. Can't use those in the wilderness. (Individual, Silverthorne, CO - #A28101.25310)

8. **DESIGNATING AREAS**. 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. (Elected Official, Union County, OR - #A8707.25230)

WHICH WOULD SERVE AS A NON-MOTORIZED TRANSITION ZONE BETWEEN WILDERNESS AND ROADED AREAS

I hope that one option for the roadless areas is to transition to a wilderness condition, where motorized vehicles are prohibited and strict limits are made on the kind and amount of access. I would like to see these areas protected on a permanent basis. There is little enough left. (Individual, Olympia, WA - #A9083.25200)

WHICH WOULD SERVE AS A MOTORIZED TRANSITION ZONE BETWEEN WILDERNESS AND ROADED AREAS

IRAs should be managed to offer opportunities and values between wilderness and "managed" (roaded) N.F. lands. The relatively natural forest setting envisioned in the RACR provides for a wide range of recreational opportunities including camping, hiking, hunting, fishing, motorized use, adventure exploration, etc. as well as amenity values such as clean water, undisturbed wildlife habitat, research, appreciation of natural vistas, etc. Commercial uses such as special forest products, outfitting/guiding, range allocation, timber harvest and salvage are also appropriate to the extent that they don't require roading and/or significantly alter the general forest setting toward the "managed" or "matrix" end of the spectrum. (Individual, Lyons, OR - #A13491.45100)

1314. Public Concern: The Forest Service should create a dynamic roadless designation.

If ecosystem management is not politically passe yet, let's apply it to this situation. In a landscape that is intensively managed for timber extraction (as many National Forests are), roadless areas are most often ecologically unique in that they are in a late seral successional stage (e.g. "old growth"). But note the term "successional," implying an inherently dynamic system. In forest ecosystems fire, disease, windstorms, and logging are the main processes which reset the successional clock. So if maintaining late seral islands and corridors within our forests is the ultimate goal, then declaring a certain area roadless only eliminates the human-induced disturbance. And the sense of "permanent protection" such a legal designation implies is at odds with the reality of a dynamic system. One of the other "natural" factors is likely to reset the successional clock. This probability will only be exacerbated in a global warming scenario. A static roadless designation doesn't go far enough toward maintaining a stable percentage of late seral ecosystems. I propose a "dynamic designation." I know this would be an implementation nightmare, especially for a federal agency, but it has a lot of merits for all "stakeholders" concerned. . . . (Individual, McCall, ID - #A25834.50100)

So these are some general thoughts on how a dynamic roadless designation could work. There are a lot more details I've considered, but don't want to elaborate on here. There are doubtless many more angles I haven't even thought of. I know that you, dear NEPA reader, have to summarize and pigeonhole this entire letter, so if nothing else, just capture the key concept of "dynamic designation." Now I know that thinking outside the proverbial box is not the Forest Service's forte, so if this just sounds like too wild an idea, then just put me on record as supporting the implementation of the RCA rule as it stands. (Individual, McCall, ID - #A25834.25000)

REQUIRE DIFFERENT LEVELS OF NATIONAL ENVIRONMENTAL POLICY ACT ANALYSIS BASED ON THE TYPE OF ENTRY PROPOSED

The level of NEPA required should be directly related to the level of access proposed to the newly opened area. Once again using a post-fire salvage logging example, if it were helicopter logged, then do a Categorical Exclusion, land based harvest using temporary roads which were then obliterated would require an Environmental Assessment, and a case where new system roads were constructed and left open would need an Environmental Impact Statement. What about a case where disease is the agent of ecological reset? That's a little touchier, because of the potential for abuse. I've seen foresters look at a stand, see a few bug-infested trees, declare the trees "imminently dead," and then draw up a clearcut unit for the entire stand in order to "stop the bugs." Sort of reminds me of burning villages in Vietnam to

"save them." I don't think entry should be allowed unless there is a significant contiguous portion (say 15%?) of the area with 100% mortality. (Individual, McCall, ID - #A25834.25000)

ALLOW BOUNDARY MODIFICATIONS

A "dynamic designation" would allow for future additions and subtractions of land from a given roadless area. Perhaps an example is in order here. Say part of a roadless area burned. Remove that portion from roadless designation and allow salvage logging of any merchantable timber (adhering to all the relevant resource protection and BAER practices). Then add an equivalent adjacent area to the remaining roadless block. Selection of what area to add should be that which is in the best condition. Criteria for additions. The chosen area should be that which is in the best condition. Criteria for selection would have to be defined (preferably in advance), and besides successional stage might include biodiversity, connectivity to other roadless areas, habitat quality (particularly for ESA species), lack of tree disease, watershed integrity, etc. A simple case would be the choice of a patch of 50-year-old second growth mixed-conifer over a diseased stand of lodgepole pine. Obviously a decision matrix would include a variety of relevant factors, but in many cases I suspect the choice would be fairly obvious. (Individual, McCall, ID - #A25834.25000)

1315. Public Concern: The Forest Service should create multiple roadless prescriptions that can be applied based on site-specific conditions.

During the plan revision/amendment process, roadless areas should be evaluated for a number of different management allocations that preclude roadbuilding and timber management. During the process, and with the participation of the public, a variety of prescriptions should be developed to address a variety of management options reflecting the values associated with the roadless areas. Among the values that should be addressed . . . in the prescriptions are:

Values important for science and scientific research.

Watershed integrity values to support aquatic diversity and critical refuge habitat for aquatic and riparian associated species.

Public water supply values.

Backcountry, non-motorized recreation.

Habitat for wide-ranging species that prefer mature unfragmented forest conditions.

Scenic integrity values.

Habitat for rare communities and threatened, endangered, sensitive and locally rare spices.

Cultural, historical and "sense of place" values.

Biological diversity values.

"Old Growth" restoration. (Organization, Damascus, VA - #A17723.25310)

1316. Public Concern: The Forest Service should allow local forest plans to add additional prohibitions to roadless management prescriptions.

Inventoried roadless areas that are not recommended for Wilderness should be allocated to prescriptions in the Forest Plan that maintain the roadless characteristics of the area in a manner consistent with the Roadless Area Conservation Rule, but that emphasize the special or unique characteristics of the area. While remaining consistent with the Roadless Area Conservation Rule direction, a prescription may be applied to a specific area or parts of an inventoried roadless area that recognizes specific additional prohibitions or mandates additional required management activities for that area. We have also noted that some of the allowed exemptions for road construction or timber harvesting may be identified as appropriate for some roadless areas and the area is allocated to an appropriate prescription. We would expect a variety of management emphases for various roadless areas. Thus, we believe it would be inappropriate to specify only one designation for the management of roadless areas that are not allocated to Wilderness recommendations. (Individual, Asheville, NC - #A22623.25300)

1317. Public Concern: The Forest Service should allow local forest plans to allocate roadless areas to prescriptions that do not contain the exemptions in the national rule.

We believe the FS should begin by defining the types and locations of roadless areas for which exceptions to the prohibitions should not be considered. This would provide an important improvement to the Rule by placing the most socially and ecologically important portions of the inventoried areas off limits to road building and timber harvesting. Through the rule-making process, the FS should establish categories of roadless areas for which exceptions should not be granted, and then document and map those areas in the course of subsequent forest plan revisions. These would include areas with scarce social and ecological values such as; a source of drinking water, reference areas for research; areas of high or unique biological diversity and old growth forests; areas that provide a bulwark against invasive, noxious, or exotic pest of weed species, areas where other roadless lands are scarce; areas that provide important historic or potential sources of dispersed recreation; areas of cultural or historic importance; and all areas that provide unique or important seasonal habitat for wildlife, fish, and plant species. For all other inventoried areas, the FS should maintain the Rule's prohibitions on road construction and resource extraction, and also maintain categories of exceptions designed to meet legitimate concerns put forward by stakeholders. As discussed above, the design and implementation of these controlled exceptions should provide the primary focal point for input by citizens living near the roadless areas. (Organization, Washington, DC - #A21762.25310)

1318. Public Concern: The Forest Service should only use roadless as a temporary designation.

A specific category labeled 'inventoried roadless' should only be a temporary label applied until designation as wilderness or for multiple use is made. Once made, these decisions should not be open for continual reevaluation. (Governor, State of Montana - #A17660.25000)

If this "roadless" scheme is implemented, there needs to be an "effective" mechanism to reclassify the area from "roadless" to allow usage of this land in the future. Without this mechanism the roadless designation is essentially a "closed" designation. (Individual, Tustin, CA - #A20777.25000)

Do Not Designate Roadless Areas

1319. Public Concern: The Forest Service should not create a specific roadless area designation.

Roadless areas should be managed no differently than any other area of the forest that is not designated as WSA or Wilderness. There is absolutely no reason to make the FS manage roadless areas as de facto wilderness or any other special designation. All activities that are permitted within the forest should be allowed within roadless areas to the extent that current forest management plans allow. (Individual, Anaheim, CA - #A953.25000)

Roadless areas as a management category should not be the discussion. Extremists have seen fit to take this specific word and try to establish it as a valid management category.

In fact, this eight letter word is and has been a word to differentiate public lands that were/are either Wilderness, potential Wilderness, or "Multiple Use Lands" (no roads).

This "wordsmithing" attempts to change public policies and laws outside of the legal process. (Association, Cody, WY - #A41559.25300)

BECAUSE CONDITIONS AND SITUATIONS VARY

There should definitely not be a separate Roadless designation. Conditions and situations vary too much for such a designation to be needed or workable. (Individual, Payette, ID - #A1049.25240)

BECAUSE THE PRESENCE OR ABSENCE OF ROADS IS NOT SUFFICIENT JUSTIFICATION

The Forest Plan should make the decision whether or not any area should be recommended to Congress for formal Wilderness designation, recognizing that the Wilderness Act defines clearly those attributes that must be present for such a designation. For other areas that do not meet these criteria, there is a full range of land use categories already in existence to use for land allocations. Forest Plan revisions should use recognized land use categories. that allow for a locally specific complement of the land management activities. While we fully support Wilderness designation, we do not support a national land use allocation category for "roadless" because we do not agree that the simple presence or absence of a road constitutes an appropriate land allocation category. In the event the Forest Service pursues such a policy, even on an interim basis, the roaded portions of inventoried roadless areas should be deleted from the designation. (Association, Terra Bella, CA - #A15588.25320)

BECAUSE IT WILL STRAIN FOREST BUDGETS

There is no reason that has been identified to develop a new category of National Forest land management such as roadless. As the Forest Service should have already discovered with other special designations, such as the White Clouds and Hells Canyon National Recreation Areas, Congress is not impressed and usually does not fund these increased special agency emphasis areas because extra budget money is not really available. The money for their management is siphoned off of other legitimate programs. Simply keep the program in the Forest Plan's designation unless the unique roadless area has unusual support that would require congressional support through a special designation. (Individual, Cambridge, ID - #A11714.25220)

BECAUSE IT IS AN UNNECESSARY LAYER OF REGULATION

At present, Forest Plans must (1) evaluate whether roadless areas meet wilderness criteria and (2) make recommendations to Congress for wilderness designation. Forest plans may also designate roadless areas for continued roadless management, regardless of wilderness recommendations. It therefore appears that the January 12 Rule imposes an additional and unnecessary layer of regulation upon roadless areas. Implementing both roadless area rule making and Forest Plan revision provides no clear benefit; rather the combined approach appears to cause significant redundancy and wasted resources. (Elected Official, Eureka County, NV - #A20741.25110)

Establishing a management category of ROADLESS unnecessarily complicates and compromises the management of public lands. There ALREADY is a sound legal process to bring roadless areas up for Wilderness inclusion by Congress. The general public is sadly unaware of this, and is being misled down the path of public policy panic. The United States Forest Service should be playing a major role in educating the public about existing legal mechanisms. It should not continue to allow itself to be "used" to this end. (Association, Cody, WY - #A41559.25300)

Regulations should not be used to allocate the roadless units. Rather, they should be short and simple, providing general guidance to forest planners. We would question that special regulations for roadless areas are actually necessary. The guidance might better be provided in manual or handbook form. (Individual, Frenchtown, MT - #A11887.25000)

1320. Public Concern: The Forest Service should not designate additional roadless areas.

BECAUSE IT WOULD NEGATIVELY IMPACT RECREATIONAL ACCESS

Protecting access. The forests belong to ALL Americans and appropriate access should be available for everyone, including access roads, trails and waterways. The current policy of land trades is acceptable if it is balanced for all parties. However, adding additional roadless areas in not appropriate any longer, population and demand for recreational access is high. WE SHOULD NOT SEEK ADDITIONAL ROADLESS STATUS. (Individual, Aurora, CO - #A538.25000)

UNTIL IT LEARNS TO MANAGE EXISTING WILDERNESS AREAS

We have already established wilderness areas and I see no need for additional roadless areas. Let us learn to manage our existing wilderness areas before we create more, hard to manage wilderness areas.

Advantages of NOT having roadless areas:

1. Minimize the possibility of catastrophic wildfires.

2. Minimize the amount of time it takes to respond to a lightening strike and, or, wildfire.

3. Minimize insect infestation of National Forests and monitor wildlife habitat.

4. Increase the area that the general public can travel to enjoy our National Forests.

5. Communities and private properties adjacent to Federal lands would be at less risk of damage or destruction due to wildfires. (Individual, Kamiah, ID - #A5419.30100)

1321. Public Concern: The Forest Service should not use inadequate road maintenance funding as an excuse for declaring an area roadless.

The Forest Service should . . . avoid the temptation of trying to solve administrative problems through planning expediencies. For example, issues such as the inability of the Forest Service to maintain roads within an area should not be used as justification for declaring an area roadless. Financial capability is a matter of the congressional budgeting and appropriations process, not a land-use matter. We recognize the situation is complex, but believe shortcuts create more problems than they solve. (Association, Spokane, WA - #A17351.17240)

Roadless Area Designation Criteria

1322. Public Concern: The Forest Service should develop objective evaluation criteria for local roadless area planning and management.

There must be regulations that aid Forest Supervisors and the plan revision teams that provide a consistent procedural approach to Roadless Area management.

The procedural regulations must give objective criteria upon which to determine, during "Analysis of the Roadless Situation": (a) which areas will be subject to Roadless Area evaluation, consistent with the parameters of roadless evaluations established in the 1964 Wilderness Act; (b) the values that must be considered in evaluating Inventoried Roadless Areas, including but not limited to (i) the developed nature of the area, (ii) the existence of roads, whether classified or unclassified, (iii) the existence of trails, whether motorized, mechanized, equestrian, or pedestrian, (iv) the existence of listed Threatened or Endangered species, (v) the remoteness of the area under evaluation (i.e. is it located under large cities, how many miles is it from the nearest metropolitan area with a population larger than 30,000); (vi) water quality, wildlife habitat, and air quality, then utilize this information to consider what management decisions are necessary to improve or maintain desired levels for these conditions recognizing that dispersed recreation, whether motorized or non-motorized does not necessarily cause negative impacts to these values; (c) what recommendation the agency made in prior evaluations as to the "sustainability" or "non-suitability" of the area for Wilderness designation, and the disposition of such designation (has Congress acted upon the recommendations); (d) whether there are any factors, and what those factors are, which would chance the agency's prior recommendations. If no contribution factors exist, the area should not be reevaluated through current planning to avoid for the nation's lumber needs; (f) the need for pedestrian recreation (how much of a need is there vs. how much of an opportunity already exists . . . ; (g) the need for motorized and mechanized recreation (how much of a need is there vs. how much of an opportunity already exists . . . ; (h) the current and historic use of the area (is the area used for canoeing, hiking, camping, cross-country skiing, OHV use, etc.); (i) the economic impact upon local economies should any alternative management decision be implemented; (j) objective criteria for measuring each consideration (are there cities or towns within 5 miles, 10 miles, 15 miles, 100 miles, etc.); (k) the likelihood of catastrophic wildfires, disease, or insect infestation (overlay map of roadless areas and their fire potential assessed by the integrity fire team); (1) whether proposed project are compatible with the values and considerations listed above. (Organization, Chesapeake, VA - #A11804.25100)

There is no hard-fast rule for evaluating protection and management of inventoried roadless areas (IRA). A number of factors must be considered when managing IRAs, among those:

Consider the current state of the IRA, not the desired state.

Consider local needs over non-local needs—locals usually know (the land) better.

Consider fire/pests/non-indigenous species and their management.

Consider displaced recreation—when recreation is displaced it adds congestion, effects elsewhere.

Consider proximity to urban areas—urban populations need a place to get away from it all—there will be adverse affects to our overall environment and economy if people must drive large distances to recreate in a manner of their choosing.

Consider accurate science that pertains directly to issues at hand. A number of studies I've seen attempt to relate outcome from one study to a totally different set of circumstances. Good, high-quality, relevant science is needed.

Finally, a local process planning forum/process is needed to consider all of the above. (Individual, Palmer Lake, CO - #A23361.45100)

1323. Public Concern: The Forest Service should clarify the criteria for identification of roadless areas in the Forest Service Handbook to ensure consistency.

FOR ROADLESS AREAS IN THE EAST

As part of the Southern Appalachian Assessment, a revised roadless inventory was conducted for the Jefferson, Chattahoochee/Oconee, Alabama, Sumter, and Cherokee National Forests. There were significant differences among those Forests in how they applied the criteria found in Chapter 7 of the Forest Service Handbook that outline the procedures for conducting a roadless inventory. Based on this experience, we believe it is important to clarify the criteria for identification of roadless areas in the Forest Service Handbook to assure consistency in its application on all Forests. Among the aspects that require clarification for roadless criteria in the East are the following:

i. Substitute the term "classified" for "improved" in the procedures for calculating the allowable road density in an area. Similarly, substitute the term "unclassified" for "unimproved". Adopted the definition of "classified" and "unclassified" used in the road policy.

ii. Definition of "Solitude" should not require cores of ROS categories of Semi primitive Non Motorized or Semi primitive Motorized lands, as was done in the SAA roadless inventory.

iii. 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.

iv. The standard should remain that road density is determined by dividing total acreage by mileage of classified road. The methodology for defining areas eligible for the roadless inventory should yield consistent results whether done by GIS means or manual means. We believe it is important to add direction to the FS Handbook for GIS delineation of roadless areas to assure consistent results are achieved. It is important that GIS analyses be used so that exact areas can be designated and mapped. It is important that final acres for roadless areas be reported only after the GIS analyses are completed. This will reduce the apparent conflict and ill feelings generated by the current procedures.

v. The Handbook should clarify that "unclassified" roads do not count toward the limit of 1/2 mile of road per 1,000 acres. Old railroad or road grades that have been abandoned and are no longer in use should not be included as "classified" roads.

vi. There should be clarification about what existing mileage of "unclassified" roads can be allowed within a roadless area. We suggest that there be no limitation on the existence of "unclassified" roads in defining allowable road mileage with a roadless area.

vii. We believe there should be greater emphasis on creating quantifiable evaluation criteria for roadless areas for consideration of these areas as Wilderness recommendations.

viii. The Handbook should clarify that the existence of privately held mineral rights or outstanding leases for areas should not be a factor in determining eligibility for the roadless inventory. These may be relevant factors in the evaluation regarding Wilderness recommendations.

ix. In general, boundaries of roadless areas should be set back a minimum distance from existing roads rather than using ridges or other topographical features. We suggest using the setback distance that has been used in a plurality of designated Wilderness areas. It may be appropriate to have different standards east and west of the 100th meridian. (Civic Group, Roanoke, VA - #A1713.45000)

1324. Public Concern: The Forest Service should amend the Forest Service Handbook.

TO REFLECT THE CHANGE IN PURPOSE FOR IDENTIFYING ROADLESS AREAS

The process and criteria for identifying roadless areas are contained in the Forest Service Handbook. Among the characteristics identified there are size, configuration, adjacency to existing Wilderness Areas, solitude, and road density. We think these 5 characteristics are appropriate for evaluating whether or not a unit of land should be included in the inventory. With regard to these characteristics, however, we think the handbook should be amended to reflect the change in purpose for identifying roadless areas. The Handbook criteria presuppose these areas need to attain minimum qualities for Wilderness designation. We think the Roadless Rule has different objectives. To address the objectives of the Roadless Rule, we think the following changes are needed:

The solitude characteristics should have nothing to do with the size of SPNM or SPM core area, nor should “sights and sounds” be considered a factor.

The term and definitions of “improved and “unimproved roads” should be changed to “classified” and “unclassified.” Road density should be calculated based on miles of classified roads per 1000 acres. (Organization, Damascus, VA - #A17723.45100)

1325. Public Concern: The Forest Service should provide up-to-date, consistent criteria for the delineation and use of roadless areas.

If a national policy regarding roadless areas is to be enacted, it should provide timely, consistent criteria for the delineation and use of these lands. (Association, Sacramento, CA - #A3681.75000)

In evaluating the Roadless designation, there needs to be a well-defined criteria. Included are unique geological/topographic character, proximity to appreciative users, the damage from past intrusion by human activities, regional watershed protection and (the difficult to define) special aesthetic qualities. (Individual, No Address - #A23613.45000)

The Forest Service must first define up-to-date criteria incorporating backcountry values in identifying roadless areas. I participated in that process, and had some concerns about the proposed revisions, which I felt were too Wilderness oriented. Those draft policies were never finalized. Nevertheless, the draft version was used to reinventory the roadless areas in the Wasatch Cache and Uinta National Forests.

These draft roadless criteria should be finalized to incorporate backcountry values. They should consistently apply on all forests as reinventories are done as a part of local forest planning. (Organization, Idaho Falls, ID - #A20543.45100)

WITH ALL MAPPING BEING GROUND VALIDATED

The first step is for the Forest Service to provide national direction on the criteria for delineation of roadless areas. 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. (Business, Colville, WA - #A3362.45000)

WITH THE DELETION OF ROADED PORTIONS OF INVENTORIED ROADLESS AREAS

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 variety of recreational opportunities. Roadless portions of inventoried roadless areas should be deleted from the inventory. (Elected Official, Boise County, ID - #A4889.45000)

1326. Public Concern: The Forest Service should develop criteria for identification of unroaded areas outside of inventoried roadless areas.

One of Idaho's major concerns is the so-called "procedural rule," which was removed from the RACR and included in the Final Planning Rules. The Rule requires local managers to identify "unroaded" areas lying outside IRAs and determine whether it is appropriate to restrict road construction and other activities on such lands so that they will remain essentially roadless.

The Rule, however, made no effort to identify unroaded areas or provide criteria and parameters for the identification of such areas during the planning process. Without such parameters, it will be very time consuming and costly for local managers to identify and examine such areas during the planning process. Indeed, requiring examination of unroaded areas without parameters for their identification poses a serious threat to the timely completion of forest plan revisions. Forest planning may well get bogged down by arguments and lawsuits over the exact scope of the lands that must be examined to fulfill the requirements of the rule. (Governor, State of Idaho - #A20141.13000)

1327. Public Concern: The Forest Service should develop criteria in the Forest Service Handbook for identifying areas to be excluded from the Roadless Area Conservation Rule.

DUE TO PRIOR DEVELOPMENT ACTIVITIES

The current roadless area conservation rule exempts areas from the rule that have been developed since the last roadless inventory, generally RARE II. It states that timber harvesting may occur in portions of roadless areas that have been developed. Specifically, it states: (4) Roadless characteristics have been substantially altered in a portion of an inventoried roadless area due to the construction of a classified road and subsequent timber harvest. Both the road construction and subsequent timber harvest must have occurred after the area was designated an inventoried roadless area. Timber may be cut, sold, or removed only in the substantially altered portion of the inventoried roadless area.

This direction leaves unclear exactly where the developed portions are located and available for additional timber harvesting (provided the prescription for the area allows such activities). When the reexamination of areas eligible for roadless status is conducted during revision of the Forest plan, this uncertainty is removed because boundaries of roadless areas are clearly delineated, and the areas to which the roadless conservation rule applies is delineated.

However, until the delineation of roadless areas is conducted as part of the revision of a Forest Plan, additional criteria should be developed in the Forest Service Handbook. These should provide more specific guidance to the Forest managers about areas that should be excluded from application of the rule due to prior development activities. (Individual, Asheville, NC - #A22623.45500)

1328. Public Concern: The Forest Service should designate areas as roadless based on inventory status.

ALL AREAS IDENTIFIED IN PAST AND PRESENT INVENTORIES

Don't limit immediate, permanent protection to RARE II or forest plan inventoried roadless areas; include areas identified in all existing inventory data. (Individual, Corvallis, OR - #A11653.45620)

AREAS IDENTIFIED IN ALL FOREST ASSESSMENTS FOR WHICH INVENTORY DATA EXISTS

The Rule should not limit immediate, permanent protection to Roadless Area Review and Evaluation II or forest plan inventoried roadless areas only, but should also include areas identified in other forest assessments for which inventory data exist. (Individual, Arvada, CO - #A17160.45400)

AREAS CLEARED THROUGH THE NATIONAL ENVIRONMENTAL POLICY ACT PROCESS AT THE TIME OF THE ROADLESS INVENTORY AND WHICH REMAIN ROADLESS

Areas with NEPA cleared units at the time of the roadless inventory which remain roadless should be given full protection under the roadless policy:

There are locations in the Tongass, such as Ushk Bay/Poison cove, and the head of Crab Bay, both on Chichagof Island, which were given a special status in the roadless inventory due to an assumption they would become roaded, since they contained NEPA cleared units. This assumption was unwarranted and these areas should be treated equally with all other areas qualified in the roadless inventory. The NEPA unit areas were left out of the maps published in the roadless FEIS. Analysts used the wrong coding rule to select roadless areas. If this situation has a parallel in other national forests, those existing roadless areas should be protected as well.

The roadless database (rdls95, an ArcInfo cover) used by the Tongass Land Management Planning Team includes the following items:

Area perimeter, rdls95_, rdls95_id, rdls_area, acres, category, category2, and type. Area provides the area in square feet of the polygons in the dataset, and perimeter the perimeter. Rdles96 and rdls95_id number the polygons. Type describes whether the polygon is land or freshwater. Acres contains the acreage for all polygons within the dataset.

The items that provide important information relative to the purpose of the dataset are rdls_area, category, and category2.

Item	Description	Code	Code from TLMP data dictionary
Category2	Roadless-Area Code	L	Roadless Area
		M	Monument Area
		N	NEPA Unit Area
		P	Non-National Forest
		R	Roaded Area
		S	Smaller than 5000 Acres polygon
		SW	Saltwater Polygon
		T	LUD II Polygon
		W	Wilderness

Item	Description	Code	Code from TLMP data dictionary
	Roadless Area		
Rdls_Area	Unique Feature I	200-299	Stikine Roadless polygon
		300-399	Chatham Roadless polygon
		500-599	Ketchikan Road-less Polygon
		888	Wilderness

The category item has similar distinctions to category2, including roadless, roaded, and NEPA Unit area.

The rdls-area item has polygons coded as zero, or from 1-577. The zero group includes areas containing NEPA cleared units, wilderness, national monuments, non-National Forest lands, and National Forest roaded areas. Therefore the zero group is not a good discriminator of the presence of roads. The numbered group reflects the code given to individual unroaded areas greater than 5000 acres. The size of the number reflects the management location of the roadless area, within the Stikine, Chatham, or Ketchikan management areas. Areas with NEPA cleared units were not given an individual number, perhaps due to the expectation they would eventually become roaded, nor were roadless areas less than 5000 acres (except for Kadin, Kasherverof, and Fake Pass). However, they remained part of the roadless

inventory and were identified by special codes in the category2 item. Simply because an area had not yet been assigned a unique feature identifier does not disqualify it from status as a suitable roadless area.

The definition of a roadless area is "undeveloped areas typically exceeding 5,000 acres that were inventoried during the agency's formal Roadless Area and Evaluation (RARE II) process, and remain in a roadless condition through forest planning decisions." Areas with NEPA cleared units were inventoried during the Rare II process, given a special code, and that remain roadless fit the definition of roadless area and should be treated equally.

It is likely that the maps produced for the FEIS were made by using the rdls-area attribute and eliminating areas coded as zero. However, this was a simplistic method that did not take advantage of all information contained in the dataset, and was therefore poor analysis procedure. The conscious decision to exclude these areas with special status in the roadless inventory due to the assumption they would become roaded was unwarranted, since in fact they did not all become roaded. The proper query would have been to select for all category2 codes L or N, where N remains unroaded, or to portray them as roadless areas with NEPA cleared units. Therefore, the maps are in error due to the omission of these areas from portrayal as roadless areas, and corrected maps should be generated. (Individual, Sitka, AK - #A15506.45623)

AREAS OF DE FACTO ROADLESS LAND ADJACENT TO THE INVENTORIED AREAS

A primary concern I have is that the inventoried roadless areas leave out large areas of de facto roadless land adjacent to the inventoried areas. (Individual, Painted Post, NY - #A357.45331)

UNINVENTORIED ROADLESS AREAS

The proposed rule should also include provisions governing the designation, management and protection of uninventoried unroaded areas. The process by which the existing roadless areas were designated wanes conservative and many areas that do not currently contain roads lie outside their boundaries. Adequate management and protection of inventoried areas should not preclude the protection of uninventoried roadless areas. (Organization, Boston, MA - #A23083.45420)

In implementing the Conservation Rule, we ask you to consider that the Forest Service obviously could not have had the personnel to inventory all roadless areas. As a result, there are large areas that are still uninventoried. As we have noted before, it should not be difficult to avoid building roads in uninventoried areas since naturally there is some requirement of knowledge of an area before road construction could intelligently be authorized. Consequently, we strongly urge that the Conservation Rule apply to all roadless areas, whether inventoried or not. They all furnish the same benefits referred to above and, thus, it is just as cost-effective to protect uninventoried as well as inventoried roadless areas. (Organization, Birmingham, AL - #A21582.45420)

1329. Public Concern: The Forest Service should designate areas as roadless based on scarcity on a forest-by-forest basis.

Scarcity. If a Forest has only a few roadless areas, they probably should keep what they have. In contrast, if a Forest has over 50% IRAs, then they have options to develop some of them if they're suitable.

I recommend that a Forest be required (through a National policy) to provide for, at least, the average acreage currently existing on a State-wide (FS), Region-wide (FS), or National (FS) basis, whichever is lowest, unless there's a strong reason not to. (The Chief should be required to concur in these situations. For example: an IRA is located in the path of a critically needed electric power transmission corridor.) A policy like this would ensure a minimum acreage of roadless values for future generations. (Individual, Libby, MT - #A2301.25000)

1330. Public Concern: The Forest Service should designate areas as roadless based on ecological characteristics.

SMALLER ROADLESS AREAS OF ECOLOGICAL IMPORTANCE

Proximity to other such areas — a roadless area of seemingly small scale may be ecologically extremely important if the distance to adjacent similar areas is biologically significant, allowing gene flow or movement of animal populations or individuals between. (Individual, Astoria, OR - #A476.50100)

An area (such as a watershed) should be recognized as roadless if is such, even though it falls below some acreage threshold. View it on a watershed level as well as an acreage level. This could result in some really neat small local areas being preserved. (Individual, Sandia Park, NM - #A26171.45330)

Please keep in mind that studies of forest ecology have shown that it takes a MINIMUM of a patch of forest NO LESS THAN 5 MILES ON A SIDE to preserve the moisture levels and wildlife status within a "virgin" forest area. (Individual, Fairfax, VA - #A26362.45330)

While protecting inventoried roadless areas will contribute to overall conservation objectives, scientists believe that roadless areas smaller than the arbitrary 5,000-acre criteria are biologically significant and should also be considered as part of your forthcoming roadless area rule. In December, 1998 170 scientists signed a letter to the Forest Service urging the agency to protect all biologically significantly area. The scientists' letter said:

There is growing consensus among academic and agency scientists that existing roadless areas-irrespective of size-contribute substantially to maintain biodiversity and ecological integrity on the National Forests. The Eastside Forests Scientific Societies Panel, including representatives from the American Fisheries Society, American Ornithologists' Union, Ecological Society of America, Society for Conservation Biology, and the Wildlife Society, recommended a prohibition on the construction of new roads and logging within excising (1) roadless regions larger than 1,000 acres, and (2) roadless regions smaller than 1,000 acres that are biologically significant (Henjum et. al. 1994), In our view, a scientifically-based policy for roadless areas on public lands should, at a minimum, protect from development all roadless areas larger than 1,000 acres and those smaller areas that have special ecological significance because of their contributions to regional landscapes.

FOREST GUARDIANS strongly believes the final rule must incorporate the best available scientific information. With that in mind, we urge the Service to implement a policy that includes all biologically important roadless areas within the National Forest System. There is no scientific justification for the exemption of these lands from roadless area protection. (Organization, Santa Fe, NM - #A22092.45320)

UNDERREPRESENTED LOWER-ELEVATION ECOSYSTEM TYPES

In the Tongass as well as many other national forests, many of the most valuable forest habitats have already been logged. The remaining roadless areas should remain exactly that, roadless and should be proposed as wilderness areas, particularly those forests with remaining stands of old growth. Much of the currently designated wilderness in the Tongass encompasses inhospitable areas, and is barren, or snow covered much of the year. Additional roadless areas could augment lowland and coastal habitats not adequately represented in current roadless areas. These should be managed for non motorized uses only. (Individual, Seldovia, AK - #A8803.25000)

Roadless areas contain habitat for numerous species, including many at risk of extinction. Better representation of all natural communities in protected areas means better protection for the myriad species they support. In general, higher numbers of species are associated with the low- and mid-elevation ecosystems found in roadless areas compared to high-elevation ecosystems. For instance, in the Southern Rockies, alpine tundra has roughly 50 associated vertebrate species while lower elevation sagebrush and semi-desert shrublands have over 160 vertebrate species. Thus, protecting roadless areas will also protect more species-rich ecosystems. This could potentially prevent many species from

becoming imperiled and eventually listed as Threatened and Endangered under the U.S. Endangered Species Act.

SREP's analysis of roadless areas in the Southern Rockies has revealed that numerous species listed as rare or imperiled by state Natural Heritage Programs, as well as several species listed as Threatened and Endangered under the U.S. Endangered Species Act, occur within roadless areas. Although further research is needed to determine the specific habitat requirements for these species, most of their remaining habitat has likely been destroyed or degraded on multiple-use public lands and private lands. Thus, roadless areas may offer a last refugia for these species, and protection of roadless areas will undoubtedly benefit many of these at-risk species. Large roadless areas are especially critical to maintain refugia for at-risk wide-ranging and sensitive species, such as wolverine, lynx, or grizzly bear, which require large tracts of land relatively free of human presence and influence. Nationwide, roadless areas support more than 280 threatened, endangered, proposed, or sensitive species. (Organization, Denver, CO - #A21367.25000)

AREAS WITH BIOLOGICAL INTEGRITY AND ECOLOGICAL SIGNIFICANCE

We wish to comment primarily on the issue of using biological integrity and ecological significance - in addition to size - as primary criteria by which additional areas are considered eligible for roadless area protection. (Business, Coarsegold, CA - #A1589.50500)

1331. Public Concern: The Forest Service should provide an independent scientific assessment of roadless areas 1,000 acres or more and ecologically significant areas less than 1,000 acres.

PERMANENTLY PROTECT THESE AREAS

We urge the Forest Service to develop a policy that:

Provides an independent scientific assessment of roadless areas of 1,000 acres or greater and ecologically significant areas less than 1,000 acres. These areas, along with inventoried areas, should be permanently protected. (Organization, Bloomington, IN - #A28110.45320)

1332. Public Concern: The Forest Service should designate areas as roadless based on size considerations.

AREAS 10,000 ACRES OR MORE IN IDAHO

Outside of Alaska, Idaho has the largest amount of inventoried roadless areas. Over 45% of Idaho Forest Service land is designated as inventoried roadless areas. On a national level, only 23% of the total Forest Service Land is designated as IRAs; this means that Idaho already has twice the national average. With this in perspective, we suggest that the 5,000 acre figure used to qualify a parcel of land as an IRA is too small. From a fairness perspective, the vastness of Idaho's forests should be taken into account, and if the plan is absolutely needed, nothing smaller than 10-15,000 acres should be inventoried as a roadless area in Idaho. If this were taken into consideration, the plan would affect Idaho much more proportionately to the rest of the country. (Association, Boise, ID - #A20607.45300)

AREAS 5,000 ACRES OR MORE

We have supported and continue to support the Roadless Area Conservation Rule. We are very much offended by the Bush Administration's plans to ignore this Rule and allow logging on National Forest roadless lands greater than 5,000 acres. As long standing Idaho residents, we are particularly concerned about the threat to Idaho's remaining roadless areas which will occur now that the Bush administration will allow logging and road building on these lands. Important portions of Idaho's National Forests lands are now threatened—areas such as the Selkirks, the Clearwater, the South Fork of the Salmon, the Boulder-White Clouds, the South Fork of the Snake, and many others. (Individual, Coeur d'Alene, ID - #A13448.45310)

A roadless area should be protected if it is an inventoried roadless area of 5,000 acres or more. (Individual, Salem, OR - #A13948.45310)

1333. Public Concern: The Forest Service should include smaller unroaded areas in a national roadless rule.

AREAS LESS THAN 5,000 ACRES

While protecting inventoried roadless areas will contribute to overall conservation objectives, many scientists believe that roadless areas smaller than the arbitrary 5,000-acre criteria are biologically significant and should also be considered as part of your forthcoming roadless area rule. In December, 1998 170 scientists signed a letter to the Service urging the agency to protect all biologically significant areas.

The Alliance for the Wild Rockies strongly believes the final rule must incorporate the best available scientific information. With that in mind, we urge the Service to implement a policy that includes all biologically important roadless areas within the National Forest System. NO AREA, INCLUDING THE . . . . MANY ROADLESS AREAS LESS THAN 5,000 ACRES, SHOULD BE EXEMPTED FROM THE FINAL RULE. (Organization, Missoula, MT - #A17234.45310)

I firmly believe that the USFS must reduce the minimum size that an inventoried roadless area must be, when they look to the many unroaded areas that might be added. It is imperative that their analysis must expand to those areas without roads that are LESS THAN 5,000 ACRES. Although many of these areas are too small for wilderness, many of them contain key habitats for a variety of species. They are also special places for humans.

Currently none are identified that are less than 5,000 acres in size. Each new unroaded area should not necessarily be examined for potential wilderness designation, but for their roadless character. Areas less than 640 acres and narrow slivers between existing roads should probably still be excluded. (Individual, Grangeville, ID - #A830.45310)

I urge you to maintain the Roadless Area Conservation Rule, and include roadless areas of less than 5,000 acres and larger if it is adjacent to an existing wilderness area. (Individual, Roanoke, TX - #A4626.45310)

While protecting inventoried roadless areas will contribute to overall conservation objectives, scientists believe that roadless areas smaller than the arbitrary 5,000-acre criteria are biologically significant and should also be considered as part of your forthcoming roadless area rule. In December, 1999 170 scientists signed a letter to the Forest Service urging the agency to protect all biologically significant areas. (Organization, Nevada City, CA - #A4941.45310)

While protecting inventoried roadless areas will contribute to overall conservation objectives, scientists believe that roadless areas smaller than the arbitrary 5,000-acre criteria are biologically significant and should also be considered as part of your forthcoming roadless area rule. In December, 1998 170 scientists signed a letter to the Forest Service urging the agency to protect all biologically significantly area. The scientists' letter said:

There is growing consensus among academic and agency scientists that existing roadless areas-irrespective of size-contribute substantially to maintain biodiversity and ecological integrity on the National Forests. The Eastside Forests Scientific Societies Panel, including representatives from the American Fisheries Society, American Ornithologists' Union, Ecological Society of America, Society for Conservation Biology, and the Wildlife Society, recommended a prohibition on the construction of new roads and logging within excising (1) roadless regions larger than 1,000 acres, and (2) roadless regions smaller than 1,000 acres that are biologically significant (Henjum et. al. 1994), In our view, a scientifically-based policy for roadless areas on public lands should, at a minimum, protect from development all roadless areas larger than 1,000 acres and those smaller areas that have special ecological significance because of their contributions to regional landscapes.

FOREST GUARDIANS strongly believes the final rule must incorporate the best available scientific information. With that in mind, we urge the Service to implement a policy that includes all biologically

important roadless areas within the National Forest System. There is no scientific justification for the exemption of these lands from roadless area protection. (Organization, Santa Fe, NM - #A22092.45320)

AREAS LESS THAN 2,000 ACRES

We should even be protecting roadless areas under the 2,000 acre limit that were omitted from current Forest Service inventories. (Individual, Eugene, OR - #A17989.45300)

Roadless Areas under 2,000 acres should also receive additional protection through the forest planning process, especially destructive off road vehicle use and hard rock mining. (Individual, Eugene, OR - #A17989.45300)

AREAS 1,000 ACRES OR MORE

The role of local forest planning and evaluation/management of the roadless areas should be INITIALLY limited to qualifying areas of 1000 acres or more for protection management. Once all of the roadless areas have been selected then, under the USFS protection and broad guidelines, and only then should local districts begin their management plan. (Individual, No Address - #A101.45320)

The Forest Service should protect all roadless areas greater than 1000 acres in size, but they should especially focus on low-elevation forests that are not adequately represented in current federal wilderness areas, but that contain some of the highest-quality and most productive fish and wildlife habitat. (Individual, Corvallis, OR - #A28160.45320)

I still support the significantly strengthened Roadless Area Conservation Rule even though it still does not go far enough - roadless areas of 1,000 acres or more need to be covered by the rule, especially since we are in catastrophe mitigation made for (1) carbon sequestration of older growth trees as a way to not exacerbate global warming further and (2) fire prevention since over 98% of all fires occur in roaded areas. (Individual, Seattle, WA - #A15157.45320)

Instead of weakening the roadless rules, I urge the Forest Service to strengthen the rule by lowering the 5,000 acre limit of roadless area to 1,000 acres. Unless this acreage limit is changed, National Forest east of the Mississippi will not be protected by the Roadless initiative. The Chippewa National Forest has NO roadless areas. The Superior, with 60,000 acres and the Chequamegon-Nicolet with 69,000 acres must have better protections not less protection. (Individual, Minneapolis, MN - #A10523.45320)

It is important to note that on forests west of the Cascade Crest in Oregon, Washington, and northern California, nearly all inventoried roadless areas are protected by administrative reserves under the Northwest Forest Plan. However, many unroaded areas are unprotected on national forests west of the Cascades, and are open to logging simply because they had the misfortune of escaping the RARE processes in the 1970s. At the time the Forest Service commenced RARE I and RARE II, scientific literature was uncertain whether roadless areas less than 5,000 acres were ecologically significant. Today, we know that roadless areas 1,000 acres or greater are incredibly important for a variety of forest species and functions.

The Forest Service has refused to heed the advice of scientists that unroaded areas that are at least 1,000 acres in size should be protected. For example, the Forest Service on the Gifford Pinchot National Forest recently approved the Acci timber sale, located in the Mount Adams Ranger District. This sale proposes to log 7.7 million board feet of timber, much of it east side old growth as defined by the Forest Service. Not satisfied with logging old growth from the matrix, the agency is proposing to enter the 5,228 acre Monte Cristo Roadless Area. (Organization, Portland, OR - #A12004.45320)

In addition to ceasing road construction, we need to prohibit off road vehicles and stop mining, oil and gas development, and logging on all roadless areas of 1000 acres or more. Public lands are the only places where we have the opportunity to maintain natural areas large enough to make a difference. We need to get this right. (Individual, Deadwood, OR - #A882.90110)

AREAS 1,000 ACRES OR MORE WITH A MINIMUM WIDTH OF 1/2 MILE

This inventory could be done during the upcoming Forest Plan revision, as a prerequisite to any IRA protection or use decision. I recommend an inventory criteria of 1,000-acre minimum size with a minimum width of 1/2 -mile wide. (Individual, Libby, MT - #A2301.45300)

AREAS 1,000 ACRES OR LESS

Areas of 1,000 acres and even less should be considered for roadless designation, as long as they are manageable in their natural conditions to protect their inherent values.

Precedent for designating areas [less] than 1,000 acres in size as roadless areas exists throughout the National Forest system, including 107 acre Odessa Roadless Area (adjacent to the Mountain Lakes Wilderness Area) and the "stand alone" 490 acre Devils Garden roadless area on the Winema National Forest. (Organization, Cave Junction, OR - #A17235.45320)

Roadless areas smaller than 1,000 acres that contain rare plant communities or that are a key part of a watershed should be protected. (Professional Society, Missoula, MT - #A17054.45320)

AREAS 500 ACRES OR MORE

Of course the main characteristic is that there are no functioning roads in blocks of land. I would like to see a 500 acre minimum but would be willing to compromise at 1000 acres. The environmental values include unfragmented habitat for sensitive species (including connecting to travel corridors), unsedimented water courses, native vegetation structure and species (old growth stands and rare plants), natural fire regimes (less fire suppression), allowing indigenous forest "pests" their place in the ecology . . . less human intrusion especially motorized vehicles, no commercial timber harvest and its associated creation of fire prone forest structure. The social and economic considerations must include national pride for conservation of natural ecosystems, the opportunity for recreation in wild places without intrusion by internal combustion pollution (noise and exhaust) and the tourist dollars generated by the recreationalists and scientific research into forest ecology to develop realistic models of forest health. (Organization, Chico, CA - #A25114.45100)

Wild Wilderness suggests that roadless areas of 500 acres or more MUST be protected from logging, mining, grazing and specifically from off-road vehicle use. To do anything less is to lay open to new and continued abuses the few lands not yet destroyed by Forest Service mismanagement and incompetence. (Organization, Bend, OR - #A19225.45300)

The Roadless Area Conservation Rule should provide for the inventory and protection of smaller roadless areas, as small as 500 acres east of the Mississippi River, and 1000 acres west of the Mississippi. 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

-Source areas for species that are disturbed as metapopulations

-Refugia for species with restricted distributions (endemic species)

-Aquatic strongholds

-Habitats for rare mollusks and amphibians

-Pockets of late-seral forests

-Stepping stones for wildlife movements and dispersals

-Winter habitat for resident birds and ungulate species

-Building blocks for restoring regions that are highly fragmented by agriculture, industrial forestry, urban and suburban developments, and roads. (Organization, Washington, DC - #A27037.45300)

AREAS 150 TO 200 ACRES OR MORE

End logging, off-road vehicle use and road building in all unroaded areas 200 acres and larger, and in any roadless area of 150 acres and larger if it is adjacent to an existing wilderness area. (Individual, Roanoke, TX - #A4626.90110)

AREAS LARGE ENOUGH TO ALLOW NATURAL PROCESSES TO WORK

According to the principles of conservation biology, roadless areas should be in large enough acreages (we might call them core habitat areas) where natural processes can be allowed to work. If a typical stand replacement fire (such as on our forest) is 10,000 acres then the roadless area should be five times that size to allow one/fifth to be in recovery. Impoverishment of biodiversity is blamed in part upon forest fragmentation which has been previously aggravated by roads and "units". (Union, No Address - #A8392.45300)

1334. Public Concern: The Forest Service should exclude unroaded areas from roadless designation based on size considerations.

EXCLUDE AREAS SMALLER THAN 5,000 ACRES

Future designations should not include "unroaded" areas smaller than 5,000 acres, which currently are classified as roaded. Identifying such "islands" of unroaded areas is ultimately a fruitless exercise. Proper ecosystem management requires examination of national forest lands on a watershed scale to determine the proper road density that will provide a balance between ecosystem integrity, forest health, commodity production, and access needs. (Governor, State of Idaho - #A20141.45310)

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:

(1) Not all inventoried roadless areas are equal. Conditions on NFS lands have changed in the past two decades, and as a result not all inventoried roadless areas have the same importance or value. Some roadless areas have become significantly smaller in size-others may have roads and other nearby developments that diminish roadless values. For example, roadless parcels adjacent to ski areas may have some roadless characteristics, but not the full range of natural characteristics that would commonly be associated with a "roadless" designation. These areas are not remote are not "undisturbed landscapes", and inevitably are influenced by nearby resort operations. As a matter of general forest planning guidance, parcels smaller than 5,000 acres in size should not be considered for roadless designation, nor should areas immediately adjacent to developed recreation sites. (Permit Holder, No Address - #A5285.45300)

No area under 5,000 acres should be considered roadless. (Individual, Anaheim, CA - #A953.45310)

Everyone should agree that the reason we are all drawn to the National Forests are for the trees and the environment they provide. However, this is the point at which we all differ in the amount and kind of management we feel should be provided. The Roadless designation to land should only entail those areas which exceed 5,000 acres in size. To afford areas of lesser size the designation could preclude some areas from reaching their greatest public benefit while balancing the conservation interests of the land. (Business, Twin Bridges, CA - #A8808.45310)

Not all inventoried roadless [areas] are equal. Conditions on NFS lands have changed in the past two decades, and as a result not all inventoried roadless areas have the same importance or value. Some roadless areas have become significantly smaller in size--others may have roads and other nearby developments that diminish roadless values. For example, roadless parcels adjacent to ski areas may have some roadless characteristics, but not the full range of natural characteristics that would commonly be associated with a "roadless" designation. These areas are not remote, are not "undisturbed landscapes", and inevitably are influenced by nearby resort operations. As a matter of general forest planning guidance, parcels smaller than 5,000 acres in size should not be considered for roadless

designation, nor should areas immediately adjacent to developed recreation sites. (Permit Holder, Winter Park, CO - #A13541.45310)

EXCLUDE AREAS SMALLER THAN 500 ACRES

No area under 500 acres should ever be considered as "roadless". (Individual, El Dorado, KS - #A5117.45310)

1335. Public Concern: The Forest Service should attempt to designate roadless areas in close proximity to each other.

Distribution. A group of IRAs in close proximity (within a mile or so) is preferable to a widely scattered bunch of IRAs. A close group of IRAs has more connectedness, and the surrounding landscape has a more wild and remote feeling.

In contrast, a widely scattered bunch of IRAs has the appearance and feeling of "islands" in the surrounding developed area. It's better than nothing, but it doesn't have the same wildness. It's more of an "oasis" feeling, which is still okay but not as wild as a group of IRAs. (Individual, Libby, MT - #A2301.45000)

1336. Public Concern: The Forest Service should designate additional areas as roadless based on current forest plan designations.

ALL AREAS UNDER CONSIDERATION FOR RESEARCH NATURAL AREA OR SPECIAL INTEREST AREA STATUS, REGARDLESS OF PROXIMITY TO ROADS

We ask that all areas presently under consideration for Research Natural Area or Special Interest Area designation be included for protection, regardless of their size or proximity to roads. (Association, Kelsey, CA - #A15815.25000)

1337. Public Concern: The Forest Service should designate areas as roadless despite existing infrastructure.

AREAS WITH PRIMITIVE ROADS OR OFF-ROAD VEHICLE ROUTES

The presence of primitive but "classified" roads, such as primitive jeep trails, should not disqualify areas. (Organization, Missoula, MT - #A17950.45525)

Wildlands CPR is adamantly opposed to the exclusion of potential roadless areas on the basis of off-road vehicle routes. User-created two-tracks, ORV routes, and other primitive travelways, for example, should not be used to exclude an area for roadless and wilderness designation. To whatever extent the final rule includes road definitions, they should be clarified to ensure that only actual roads, deliberately constructed and maintained as such, intended for and capable of use by street-legal passenger vehicles, be counted as roads when making these determinations. This concern extends to both areas already inventoried as roadless as well as uninventoried areas that would otherwise meet the roadless criteria. (Organization, Missoula, MT - #A21359.45620)

AREAS WITH GHOST ROADS OR WAYS

Two-track roads and "ghost roads" should not disqualify an area from roadless designation; we need to save these remnants, recover and reconnect them. (Individual, Flagstaff, AZ - #A5026.45522)

AREAS WITH ROADS THAT ARE CLOSED OR NOT IN USE

Roadless is not always roadless yet should be managed as such. In Idaho we have miles of unused roads, and un-maintained roads in the forests. Since these roads are not used or they are closed, these areas need rehabilitation and protection as roadless areas. Due to the low quality of the roads, overgrowth, and lack of use many areas appear roadless and since the future holds no further need for these roads we should include them in our roadless maps. Reseed and rehabilitate the roads and leave it at that (Individual, Boise, ID - #A64.45522)

1338. Public Concern: The Forest Service should not designate areas with existing infrastructure as roadless.

AREAS WITH ROADS

Roadless areas must only be mapped where there are NO roads. Just because a non-system road exists is no reason to include it in a "roadless" area. (Individual, Ridgeway, PA - #A4933.45100)

Areas that have roads that are unmaintained or abandoned, or blocked by the USFS are not "roadless," they are merely abandoned or not maintained. It appears that the USFS is calling many of these areas roadless. (Individual, Stayton, OR - #A1042.45200)

I'm sure communities near roadless areas already have roads or there wouldn't be communities. By definition if you build a road in a roadless area it is not roadless. What nutcase wrote these questions? (Individual, Atlanta, GA - #A4509.45000)

Inventoried roadless areas that contain old, overgrown or obliterated should not qualify for status in the category. The USFS must map and list all roads (new and old). (Individual, Viola, ID - #A23458.25200)

The Summary Section of the DEIS referenced the following statement by President Clinton dated October 13, 1999:

"Within our national forests there are large parcels of land that don't contain roads of any kind, and in most cases, never have . . . " (DEIS, S-1). Notwithstanding the President's direction to develop regulations for these roadless areas, the Proposed Rule departed from the President's direction and now encompasses lands which are in fact roaded. If this program is truly directed toward roadless areas, then only those areas without roads, ways, stock driveways, etc should be included. (County Attorney, Grant County, OR - #A17667.45512)

AREAS CONTAINING ROADS THAT MIGHT QUALIFY AS VALID REVISED STATUTE 2477 RIGHTS-OF-WAY

No area should be considered roadless if there is any road that might qualify as a valid RS-2477 right-of-way. (County Administrator, Saguache County, CO - #A28774.45510)

AREAS WITH TRAILS

Roadless areas should not contain anything that resembles a trail. If a trail exists, it should be for multiple uses. If a trail is 70" wide, it should be open for 4WD vehicles even if it fails to meet "road" requirements. Single-track trails are sufficiently wide for motorized bike access that should also be permitted. Snowmobiles may also take advantage of existing trails in inventoried roadless areas. (Individual, Helena, MT - #A150.91110)

1339. Public Concern: The Forest Service should designate areas as roadless despite historic motorized use.

It infers that those areas not recommended to be designated as roadless areas are somehow unsuitable or inferior. Burke Branch is not designated as roadless yet, but it is ideal for roadless designation and only has not been designated as so because of historical use by ATV riders despite it presently being protected by a permanent injunction against such use.

Who determines "potential," "interest," and "low wilderness value"? We continue to erode our wilderness areas without considering the need to develop new areas to perpetuate our inheritance. (Individual, Brookport, IL - #A17229.45624)

1340. Public Concern: The Forest Service should not designate areas with specific resources as roadless.

AREAS WITH NATURAL RESOURCES

Roadless areas are to remain roadless only if they do not offer extractive resources that further the needs of society or they were designated as a national park or wilderness before the Clinton/Gore administration started their silliness. First and foremost priority of Land and Resource management should be to support and compliment the society with the renewable and non-renewable extractive resources that are present on the land in question. (Individual, Hamilton, MT - #A94.65000)

Your role in forest service lands is to first manage the development of natural resources and to issue permits for mining and grazing and for timber. Some entity needs to control the acres so that we do not have the problems before the Taylor Grazing Act but again be careful of your management to stifle the economy. Without some sort of control of livestock permits this may cause a battle similar to early part of the 20th century between the cattleman and the sheepherder. (Individual, Elko, NV - #A4853.65000)

Additionally, for logging, grazing and mining requirement, we need a policy of resource management, not resource lock-up. (Individual, Olathe, KS - #A5001.65000)

1341. Public Concern: The Forest Service should not designate areas surrounding private property as roadless.

It should be clearly recognized that access rights limit the ability of the Forest Service to manage an area as roadless. The agency must adhere to the spirit and letter of the law by providing reasonable access through the local land management planning process. In general, if private property is surrounded by roadless lands, these lands should not be officially designated as roadless. (Organization, Anchorage, AK - #A15542.40100)

Inclusion/Exclusion of Specific Areas from a National Roadless Rule

Summary

Inclusion – A number of respondents request that specific areas be included in roadless area protection. These people state that the Forest Service should not allow any exemptions or exclusions from the Roadless Area Conservation Rule. One individual suggests the Forest Service replace any area exempted from roadless designation with equal acreage in smaller roadless areas. Several respondents suggest that national forest districts and certain geographic areas be protected in a national roadless rule. These respondents often mention that roadless areas in the eastern United States are disproportionate to those in the western United States and that areas in the East should be included. Others suggest the Forest Service include roadless areas in a national roadless rule based on proximity to other protected areas including areas adjacent to national parks, designated wilderness areas, and areas that cross administrative boundaries. Some people request that the Forest Service include roadless areas in a national roadless rule regardless of forest plan revision status. An organization asks the Forest Service to include areas that are returning to a wild condition. (A list of specific areas requested to be included in/excluded from roadless area protection is found in Appendix F.)

A number of respondents request protection for Alaskan national forests and specifically request that the Tongass National Forest be included in a national roadless rule. People offer a multitude of reasons for protecting these areas. Some propose the Forest Service include Alaskan national

forests in a national roadless rule for social and recreational values. Others state that they should be included to protect the environment and environmental values such as biodiversity, old growth, wildlife and fish habitat and species, etc. People also request Alaskan national forests be included in order to reestablish the balance of multiple resource use; because these forests should be treated the same as all other forests; because there is much public support for protection of these forests; and as a commitment to global rainforest conservation. Further suggested reasons for inclusion include the importance of these areas to those who rely on subsistence food, to tourism, and to commercial fisheries. Several individuals assert that the Forest Service should immediately implement the Rule in the Tongass National Forest because scheduled timber sales make the Rule even more necessary; while others state that timber sales in these forests are not economically viable. Some Organizations assert that the Forest Service should not use the fact that the Tongass National Forest has a recently revised forest plan as a reason to exclude it from a national roadless rule.

Exclusion – A number of respondents assert that specific areas should be exempted from roadless area designation/protection. One group suggests that the Forest Service develop additional criteria to provide guidance to forest managers regarding areas that should be excluded from the Roadless Area Conservation Rule due to prior management activities. Others suggest the Forest Service exclude certain roadless areas from roadless designation/protection based on active management potential, including areas adjacent to recreational sites; special use permit areas or master active management plan areas; areas with existing or future operations at four-season resorts within or adjacent to existing or future special use permit boundaries of ski areas; and areas used for pipeline transportation and oil and gas development. People also comment on what they believe to be the disproportionate amount of acres of roadless areas in the western United States and ask that these areas, as well as national grasslands, be excluded. Others say the Forest Service should exclude certain roadless areas from roadless designation/protection that have recently completed forest management plans.

Some people state that the Forest Service should exclude Alaskan national forests from a national roadless rule because inclusion of these forests, they say, would be contrary to Alaska state and federal laws. One tribal organization asks the Forest Service to recognize that it cannot supercede land allocations on the Tongass National Forest with a national roadless rule. People say Alaskan national forests should be excluded because the Tongass National Forest has just revised its Land Management Plan; because decisions should be made through the local forest planning process; because extensive local forest planning has been completed; because the Tongass Land Management Plan is currently under appeal; because the Chugach National Forest is now at the stage of releasing a Final EIS; and because the proposed Rule was not addressed in the Chugach National Forest plan revision process. Others suggest the Forest Service exclude Alaskan national forests for environmental and forest health reasons. Some suggest they be excluded in order to maintain traditional multiple use management, and to maintain the availability of natural resources upon which local economies depend.

Inclusion

1342. Public Concern: The Forest Service should not allow any exemptions or exclusions from the Roadless Area Conservation Rule.

I very strongly urge you to exclude ANY exemptions or exclusions that could potentially weaken the Roadless Area Conservation Rule. I especially urge you to ensure that Alaska's Tongass National Forest,

as our nation's largest, receives full protection. In order to preserve our nation's wild forests, and thus our cultural, economic, social, recreational, and biological wealth, I urge you in the strongest tone possible to protect ALL of America's Roadless Areas including Alaska's Tongass and Chugach, from ALL logging, roadbuilding, mining and fossil fuel exploration/drilling. THE PEOPLE HAVE SPOKEN: PLEASE DO NOT IGNORE THEIR VOICES. (Individual, Kennett Square, PA - #A689.10150)

INCLUDE EACH NATIONAL FOREST DISTRICT

Do not allow any exemptions for individual National Forests Districts (N.B. most important). (Individual, Long Beach, CA - #A21202.45620)

1343. Public Concern: The Forest Service should replace any area exempted from roadless designation with equal acreage in smaller roadless areas.

If you eventually remove the roadless designation from some areas in order to please the folks who live nearby, it is only fair to replace them acre for acre with smaller roadless areas that were not included before. (Individual, Deadwood, OR - #A881.45621)

1344. Public Concern: The Forest Service should include certain geographic areas in a national roadless rule.

INCLUDE AREAS IN THE EASTERN UNITED STATES

Expand roadless area protection to include all areas in the E. U.S., including those not presently covered as small as 200 acres. No weakening or exemptions. (Individual, Paoli, IN - #A10608.45300)

The National Forests in the east need such protection in smaller roadless areas because of the greater press of civilization and higher population. (Individual, Bethel, VT - #A8684.45621)

The Roadless Area Conservation Rule must be maintained and vigorously defended as previously written. Some of the proposed changes are very bad ideas, such as requiring that roadless areas be at least 5,000 acres. This isn't appropriate in our smaller eastern forests and the previous 1,000 acre threshold should be maintained. (Individual, Decatur, GA - #A19228.45320)

Another factor relating to the protection of roadless areas the Forest Service should consider is the scarcity of roadless areas in the eastern United States. In the first published draft of the proposed Roadless Area Conservation Rule, the Forest Service appropriately highlighted the need for special treatment of eastern areas in part of the proposed Roadless Area Conservation Rule where it stated: "In selecting areas, the responsible official should consider the distance from, and the scarcity of, other unroaded areas, particularly for those areas east of the 100th meridian." Roadless Area Conservation, 65 Fed. Reg. 30275, 30288 (2000) (to be codified at 36 C.F.R. 294.13(b)(2)) (proposed May 10, 2000) (emphasis added). Because only some 726,600 acres of inventoried roadless area remain in the Southern Appalachians, it is imperative that special attention and consideration be given to Eastern roadless areas. Our scarce roadless areas are increasingly in demand for all sorts of recreation, making the need to preserve them more pressing than ever. (Organization, Charlottesville, VA - #A15659.45341)

Superior Wilderness Action Network (SWAN), urges the Forest Service to uphold the Roadless Area Conservation Rule (RACR), as published in the Federal Register on January 12, 2001. SWAN submitted comments during scoping and on the draft environmental impact statement for the roadless rule. Instead of weakening the rule, SWAN urges the Forest Service to strengthen the rule by lowering the 5,000 acre limit of roadless area to 1,000 acres. As we stated in our previous comments, unless this acreage limit is changed, National Forests east of the Mississippi will not be protected by the Roadless initiative. The Chippewa National Forest has NO roadless areas. The Superior, with 60,000 acres and the Chequamegon-Nicolet with 69,000 acres must have better protections not less protection. (Organization, Plymouth, MN - #A7116.10150)

1345. Public Concern: The Forest Service should include roadless areas in a national roadless rule based on proximity to other protected areas.

INCLUDE AREAS ADJACENT TO NATIONAL PARKS AND DESIGNATED WILDERNESS AREAS

Several of these roadless areas have been evaluated and rejected for wilderness consideration. However, some of them are adjacent to national parks and designated wilderness areas and can provide larger buffer zones for habitat protection. Therefore they should be maintained under roadless area management until further planning processes can address which roadless areas should be converted to wilderness. (Individual, Ethel, WA - #A11767.45331)

The 5,000 acre, or adjacent to existing Wilderness, condition should be maintained as a requirement for roadless areas. (Individual, Logan, UT - #A13482.45331)

We were also disappointed that the Roadless Rule does not protect uninventoried roadless areas and roadless areas smaller than 5,000 acres, even if such areas were adjacent to existing protected areas (designated Wilderness, wild rivers, national parks, etc.). Ironically, the previous moratorium on road construction in roadless areas, which took effect in March, 1999, did protect some of these smaller roadless areas if they are adjacent to protected areas. We believe protecting smaller "unofficial" roadless areas that have been identified by the Forest Service or citizens is of the utmost importance, especially those adjacent to designated wilderness and other protected areas. We strongly urge the Forest Service to incorporate smaller roadless areas identified in maps submitted by citizen groups into the Roadless Rule; specifically, we ask you to incorporate maps previously submitted by the Aspen Wilderness Workshop and the Upper Arkansas and South Platte Project, as well as other information from conservation organizations in Region 2, into the Roadless Rule. (Organization, Denver, CO - #A21367.45621)

INCLUDE AREAS THAT CROSS ADMINISTRATIVE BOUNDARIES

They deserve a broader national protection, one that crosses current administrative boundaries (e.g. Park Service, USFS, BLM, and private holdings), in other words, the values are not necessarily for the USFS alone to determine. An excellent example of such umbrella designation is the proposed Northern Rockies Ecosystem Protection Act H.R. 288, NREPA provides an excellent example of such value designations. (Individual, Boulder, CO - #A28606.12312)

This summer I visited the Sunshine Basin east of Yellowstone National Park. This clearly should be provided the same kind of protection that Yellowstone enjoys. Areas like this must be considered in a context which crosses administrative (e.g. Park Service, USFS, BLM and private) holdings. In other words, the values are not necessarily for the USFS alone to determine. For the northern Rockies, the proposed Northern Rockies Ecosystem Protection Act H.R. 488, NREPA provides an excellent example of such value designations. (Individual, Boulder, CO - #A28606.12312)

1346. Public Concern: The Forest Service should include roadless areas in a national roadless rule regardless of forest plan revision status.

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 roading in pristine forests. The revision of forest plans includes a legal requirement to re-inventory 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 those reassessments have been sloppy and inadequate. (Organization, Portland, OR - #A12004.12450)

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)

Roadless areas in the National Forests covered by the Northwest Forest Plan are also at risk. During the roadless area "open houses," Region-6 staff were repeatedly asked why they continued to develop and implement commercial timber sales in roadless areas. Their responses to this concern were uniformly evasive and confirmed that many timber planners in the region intend to log and degrade roadless areas, hence limiting the areas eligible for inclusion in the Wilderness system.

Examples of current timber sales impacting roadless areas in the Willamette National Forest include:

Moose Timber Sale, Sweet Home District, Willamette National Forest (EIS completed, Decision Notice signed). The sale includes commercial harvest in the 5,674 acre RARE I Moose Creek Roadless Area, which currently provides important connectivity for wildlife between the Menagerie and Middle Santiam Wilderness Areas. Moose Creek proper is eligible for designation as a Wild and Scenic River. Moose Creek is also a major tributary to the South Santiam River, which provides municipal drinking water to the communities of Lebanon, Sweet Home and Albany. The proposed timber sale calls for logging 22.5 mmbf and constructing 1.9 miles of new roading (outside the inventoried roadless area).

South Pyramid Timber Sale, Sweet Home District, Willamette National Forest (EA in scoping). This newly proposed timber sale includes two alternatives that call for logging in the Three Pyramids unroaded area (and one alternative that would stay out of the roadless area). As yet, little information has been developed or made available about this timber sale. The scoping notice indicates that between 99 and 209 acres of the roadless area will be logged and that helicopter, skyline, and tractor logging would be allowed. The Three Pyramid's unroaded area is an extremely popular recreation destination and the South Pyramid Creek trail travels through the heart of the planning area.

Helldun Timber Sale, Middle Fork District, Willamette National Forest (EA completed, currently offered as replacement volume to Scott Timber). While avoiding logging in inventoried roadless areas, the proposed 9 mmbf, 100-acre clearcut Helldun timber sale will have a disproportionate impact on irreplaceable roadless values in the Middle Fork District. Currently, the Helldun ancient forest is part of a 2,000-acre block of fragmented ancient forest that connects the Waldo Wilderness with the RARE II inventoried Cornpatch roadless area. Combined, these roadless areas total over 35,000 acres, one of the largest intact forests in the Middle Fork District. The timber sale calls for logging over the popular Eugene to Crest Trail and degrading the Eagle Creek Special Interest Area, one of only two special interest areas in the Willamette National Forest. The planning area has also been proposed as a Research Natural Area to be preserved for scientific study of its unique ecological characteristics.

Coffin Timber Sale, Detroit District, Willamette National Forest (EA completed, Decision Notice signed, sale unawarded). While the EA for the Coffin timber sale proposed logging 2.77 mmbf from 277 acres of the Coffin/Bachelor Mountain roadless "semiprimitive area" after the decision notice was signed, the volume doubled to 5.37 mmbf. The Coffin Mountain timber sale is located within the Mary's Creek Sub-basin of the Upper North Santiam watershed, which contributes to the municipal drinking water supply for over 165,000 Oregonians. Many of the slopes within the proposed timber sale are extremely steep. The entire sale is within the transient snow zone in which "rain-on-snow" events associated with logging and road-building often increase peak flows, turbidity and sediment loading to the watershed. (Individual, Washington, DC - #A30150.45500)

1347. Public Concern: The Forest Service should include roadless areas in a national roadless rule based on environmental characteristics.

INCLUDE AREAS THAT ARE RETURNING TO A WILD CONDITION

The majority of comments received about the roadless initiative in Vermont stated that the roadless initiative was a positive initiative, and that in fact it did not go far enough in protecting old growth forests in the Tongass, and further that it did not go far enough in protecting de facto roadless areas in eastern forests such as Green Mountain National Forest, where many areas are returning to wild conditions after heavy human use in the 19th century. (Organization, Waterbury Center, VT - #A29884.10150)

1348. Public Concern: The Forest Service should include Alaskan national forests in a national roadless rule for social values.

I visited Alaska (which included the Tongass National Forest) about three weeks ago. It is a beautiful, peaceful, and serene place! Please protect the Tongass and Chugach National Forests (as well as our National Forests) from any type of Logging, Roadbuilding, and other development. (Individual, Fremont, CA - #A9229.45620)

I have personally seen the beauty of Alaska's Tongass National Forest. Alaska's Tongass National Forest is the only rainforest in the U.S. Not many Americans even know there's a temperate rainforest in the USA. Alaska is the last remaining wilderness untouched by man I only hope and pray it stays that way. Pure, untamed wilderness untouched by man - wilderness wild and free - my God, how can anyone not be awestruck or blown away by the site of a massive glacier in the site of not one but seven bald eagles in their natural habitat - a habitat still pristine, wild, natural and not touched or destroyed by man? This is what I saw on a hike in the Tongass and I will never forget the emotions it worked. To see and experience such beauty made me want to cry I did. These are treasures that no amount of money can buy. (Individual, Dracut, MA - #A6220.45623)

I strongly urge the conservation of the Tongass and our other National Forests and wilderness areas as forever wild.

The oxygen these areas generate is not just physical; it is spiritual oxygen as well, more and more valuable in a society where access to large, unspoiled tracts of natural beauty is under siege from short-sighted, greed-motivated companies and individuals. (Individual, Schenectady, NY - #A30333.45620)

FOR FUTURE GENERATIONS

We have so little pristine wilderness left that it is imperative to protect that which remains for future generations. For this reason I also oppose any attempt to deny protection to Tongass National Forest in Alaska. (Individual, Tempe, AZ - #A8713.45623)

I have lived in various parts of the Tongass since 1982 and I treasure it for what it is and want to see it remain this way for succeeding generations. Anymore, such places are rare and rapidly disappearing. It is high time that our nations wakes up and halts this destructive habit which has so altered the environment and ecology of our great land. (Individual, Wrangell, AK - #A24501.45623)

Living in Washington state, I am reminded of the ugly unsightly destruction that follows road building in our National Forests every weekend. If the Tongass rainforest was disturbed as much as the west and south side of the Olympic National Forest, we would be destroying pristine land that can not viewed again in our lifetime or our children's lifetime ever in the same pleasurable manner that it can today. We must protect our heritage and preserve the small areas of land that have not been altered for thousands of years. (Individual, Kingston, WA - #A4414.45623)

1349. Public Concern: The Forest Service should include Alaskan national forests in a national roadless rule for recreational values.

Pristine areas of the Tongass are important for fish and wildlife habitat, clean water, subsistence, and recreational activities, all of which contribute to the quality of life for Southeast Alaska residents, and those who visit our area to enjoy an experience that they can't find where they live. I personally use the Tongass for introducing people from all over the world to the incredible beauty of our area as experienced from a kayak. Under Forest Service Permit, I conduct guided tours from several hours to extended overnight periods, and educate my clients to follow a leave-no-trace camping ethic. Road building and logging in these areas would be in direct opposition to that ethic that I am trying to convey to those that use our National Forests for recreation. Our type of operations preserve the forest for all to enjoy in the future. My continued use of these areas depends upon them remaining in a pristine, undeveloped state. Road building and the logging that will follow changes its entire character, never to

be the same again. There are no areas left in the country like the Tongass. Can't we leave this last vestige of true wilderness the way it was meant to be before all others are totally lost? (Business, Sitka, AK - #A24665.45623)

The Chugach and Tongass National Forest embody the definition of reason for people living in and loving Alaska. In what other state in the United States can you commonly see bear and moose with the opportunities to view the elusive wolf and lynx? In what other state can you find not only the fishing opportunities that pristine watersheds provide but also the incredible amount of backcountry wilderness recreation that surrounds those living in Southcentral and Southeast Alaska. (Individual, Cooper Landing, AK - #A17758.45622)

We enjoy the outdoors. Camping in Alaska is great. I support the permanent protection of the Chugach and Tongass National Forest. (Individual, Union City, MI - #A25152.45623)

1350. Public Concern: The Forest Service should include Alaskan national forests in a national roadless rule to protect the environment.

FROM DESTRUCTIVE ACTIVITIES

In spite of the fact that at public hearings held throughout SE Alaska last summer the majority of Alaskans wanted immediate and irrevocable protection for the Tongass National Forest, the poor forest is once again open to assault from the logging and mining industries.

I have been a resident of SE Alaska since 1968 and have witnessed first hand degradation of one of the most beautiful states in the Union of States. I not only worked on fishing boats, I owned and operated my own boat for a number of years. The bays and areas where I fished no longer exist. They are water deserts fed by slash choked streams and poisoned from the efforts of mining operations.

I lived in Petersburg when thousands of acres were "accidentally" logged in Portage Bay off Frederick Sound because of "confusion" over the boundaries of the timber sale. Cape Fanshaw, Farragut Bay and Pinta Point were areas that were lovely, now they look as though bombs have been dropped on them. And these areas were and are being logged because less visible areas have already been decimated. Prince of Wales used to be a lush, verdant island. It now looks like a mowed off golf course. Gravina Island is becoming an industrial park.

I have written many letters over the years to Murkowski, Stevens, and Young, protesting the treatment the Tongass is being given, and have repeatedly been told I am a lonely misfit and that the majority of Alaskan residents want logging to continue. This was proven false with the testimonies given last summer. (Individual, Ward Cove, AK - #A5673.45623)

The Tongass National Forest needs to be covered in your roadless policy because it has 2 million roadless acres that are right now at risk of logging and other development schemes under the current forest plan. This includes more than 400,000 acres of old growth. Combine that with the fact that the Tongass National Forest has the most heavily subsidized logging program in the entire national forest system (costing taxpayers $33 million a year) and you have a situation that is NOT good. The Forest Service can't maintain existing roads (including fixing blocked culverts). If it can't do that, it better not be building any new roads! This includes NO boondoggle roads like the proposed Bradfield Canal, Taku River, and Juneau-Skagway roads! (Individual, Minneapolis, MN - #A8375.90110)

Five years ago I spent 3 and a half months living in the Tongass National Forest in Alaska. I was in awe the full duration of my stay. Being somewhere American Bald Eagles (the very symbol our country adopted for pride and dignity) are not a rare occurrence but they flourish, had renewed my sense of patriotism. What would it say about us as a people if we plunder the lands of our chosen national symbol (and the countless other species that are not as lucky to be revered, or even noticed by our population) for the sake of a quick small profit? Why is it that much of the wood harvested from the Tongass National Forest is practically given away to Japan as 'war reparations"? They have more than recovered

economically since World War II ended is 1945. Such practices are no longer necessary. (Individual, East Aurora, NY - #A6187.45623)

American Lands urges the Forest Service to include the Tongass National Forest, the largest National Forest in the system, in the roadless area protection policy. Some 2 million acres of roadless wildlands in the Tongass are at risk of clearcutting, road building, and other development—an area bigger than Delaware and Rhode Island combined.

The Tongass is home to many wildlife species, including salmon, grizzly bears, black bears, river otters, deer, moose, mountain goats, bald eagles, and wolves. This spectacular array of wildlife thrives thanks to the combination of rainforest habitat and Alaska's relatively wild character, which buffers the deleterious impacts of development common in the rest of the country. For example, bald eagles depend on ancient trees for nesting, deer depend on large stands of ancient forest for cover and access to winter forage, and grizzly bears depend on large tracts of healthy forest for food, shelter, and solitude. To survive, grizzly bears particularly depend on wilderness. They simply cannot exist in close and constant proximity to humans.

But the natural beauty and abundant wildlife of the Tongass have long been threatened by clearcut logging and road building. In May 1997, the Forest Service issued a land management plan for the Tongass. During the planning process, scientists from within and outside the agency warned that continued road building and logging in large blocks of old growth forest areas pose a serious threat to fish and wildlife (Powell et al. 1997). The Service's own economists concluded that demand for Tongass timber is at an all-time low and is expected to remain so for at least the next ten years. And, of more than 19,000 public comments to the plan, more than 70 percent supported lower levels of logging and greater protections for fish and wildlife. In short, new scientific and economic information, coupled with the cancellation of long-term pulp contracts and overwhelming public sentiment, have created a critical moment of opportunity on the Tongass.

Unfortunately, the Tongass Forest Plan runs counter to scientific recommendations, public opinion, economic data, and the federal government's commitment to protecting the Tongass. The Plan threatens the future of this incomparable wilderness by authorizing levels of destructive clearcut logging and road building. It allows logging in previously undisturbed areas and more than doubles allowable logging levels for the next ten years over the amount cut last year.

Only about 11 percent of Alaska's rainforest has been clearcut to date, but more than half the best timber stands—which are also the best wildlife habitat—have already been logged. While the Alaska rainforest still boasts healthy populations of fish and wildlife, continued road building and logging would dramatically impact fish, wildlife, and the ecosystems upon which they depend. (Organization, Missoula, MT - #A17234.45623)

It is unfortunate that these so-called representatives of Alaskan residents are actually citizens of Washington, DC, one of the most densely populated cities in the US. It appears they have come to believe that overcrowding and asphalt are the standards to which Alaska should aspire. Perhaps if they actually lived in Alaska they too would be saddened by what has happened to this unique state over the years. The mining, logging, and oil industries, abetted by Murkowski, Stevens, and Young, have all conspired to turn this state into just another, slashed, burned, poisoned, sucked dry piece of land, while they all go to the bank.

Please, please don't make it easy for them. Protect the roadless watersheds that are left in the Tongass National Forest. This forest is a special case, but not in the sense that it should be exempt from protection. It should have even more stringent protection. It is the last little bit of "wild" forest left in the US. (Individual, Ward Cove, AK - #A5673.15100)

<u>Case for conserving America's wildest roadless forest</u>

As background, it is useful to point out that that Chugach National Forest (CNF) was specifically created in 1907 by President Theodore Roosevelt to protect its unique character, which included fisheries protection as well as the protection for forests and watersheds. Today, more than ever, this need still exists.

The Chugach is the wildest and most-glaciated National Forest in the national forest 2.7 million acres of the 5.5 million in the Chugach is classified as rock, snow and ice. At 98% inventoried roadless, more than half of the roadless areas on the Chugach are classified as "rock, snow and ice". [*Footnote 1: The Chugach is 98% inventoried roadless-multiplied total CNF acreage of 5,467,615.45 y 0.98 to get = (5,358,263.141) then divided by 2.718,842.89 (total rock, snow and ice acreage) and multiplied by 100 to get 50.741122980619235542926991162489 or 51%.] that public resources be protected. Too often, true public resources (those resources from which the general public benefits, such as clean air and water or productive soils) are confused with extractive resources (those resources leased to private companies, such as timber, minerals or oil and gas). The disservice to Americans is profound. Clean air and drinking water is polluted, fish habitat compromised and taxpayers left to foot the clean-up bills. (Organization, Anchorage, AK - #A23038.45622)

BECAUSE IT WOULD PREVENT COSTLY AND ENVIRONMENTALLY DAMAGING STATE HIGHWAY CONSTRUCTION PROJECTS

Protecting all roadless wildlands on the Tongass under the roadless policy would prevent costly and environmentally damaging state highway construction proposals. Instead of investing limited resources into construction of roads like those up the rugged Lynn Canal from Juneau to Skagway, from Sitka to Baranof Warm Springs, across the Cleveland Peninsula, or up the Bradfield Canal to Canada, devote those scarce funds to improving the most natural and cost-effective transportation route in Southeast Alaska—the Alaska Marine Highway System. (Organization, Juneau, AK - #A23091.90120)

BECAUSE THE ALASKA STATE FOREST PRACTICES ACT IS INEFFECTIVE

Throughout my twenty year tenure on the Tongass I saw the atrocities wreaked upon the land by the long term contracts which now pale when compared to the effects of logging practices wreaked upon the 800+ square miles of forest land grants from the Tongass to the Alaska Native Corporation under ANSCA. These lands have now been largely liquidated of timber, with all raw log export to the Orient, under the toothless and ineffective Alaska State Forest Practices Act. (Individual, Sitka, AK - #A1056.65200)

1351. Public Concern: The Forest Service should include Alaskan national forests in a national roadless rule to protect environmental values.

TO PROTECT ECOLOGICAL CHARACTERISTICS

Of great concern to me are the political forces that would like to exempt, or in other ways relieve the Tongass National Forest from the Roadless Rule. I recommend that the rule apply equally to the Tongass, the largest and in many ways one of the wildest forests in the National Forest system.

The current transition in the timber industry of Southeast Alaska is from one dominated by a few large corporations (with massive infrastructure and road-building capability) to one characterized by many small and a few medium-size operators (desiring smaller timber sale offerings and with limited capacity to construct major roads). Institution of a policy to protect the ecological characteristics of remaining roadless areas is best done under such circumstances, when existing industries will be least disrupted. In evaluating the Forest Service's obligations to provide for multiple uses, we suggest that you evaluate the ability of currently-roaded areas on the Tongass where habitat values have already been compromised, to provide timber to support the existing industry. We note that only 16 percent of the inventoried roadless areas are classified and tentatively suitable for timber harvest (USFS 1997, p.e-164). So it seems that relatively little would be given up. (Permit Holder, Juneau, AK - #A23220.45613)

"The 8.7 million roadless acres in the Tongass National Forest need immediate protection. This area has a high degree of biological integrity and overall ecosystem health is largely due to the quantity and quality of the inventoried roadless areas. Preserving roadless areas is central to maintaining a high degree of biological diversity." (Individual, Puyallup, WA - #A829.45623)

ACE has been active for many years in conservation of the Tongass and Chugach National Forests because of the numerous and irreplaceable ecological benefits provided by the forests in their currently

wild and un-roaded condition. These benefits, which accrue equally to local communities and the nation, include:

clean air and water, diverse and numerous fish and wildlife populations, and the ecological, cultural and economic benefits of the intact forest flora.

Roads fragment habitat for fish and wildlife, opening forests to industrial activities and motorized uses hat add cumulative impacts, which can disrupt the carrying capacity and biological diversity of the land. (Organization, Anchorage, AK - #A23038.45622)

TO PROTECT BIODIVERSITY

No exemption should be made for the Tongass Rainforest—and outstanding example of biodiversity which needs to be kept as a part of our heritage. (Individual, San Pedro, CA - #A11584.45623)

I am writing to express my opposition to any change to the Roadless Area Conservation Rule that would allow logging in the Tongass National Forest or any of the national forests currently protected by this rule. I particularly oppose allowing this in Alaska's Tongass rainforest. I was able to visit this area recently and was impressed by both the diversity of wildlife and plants present as well as the fragility of the area, particularly the islands. I am concerned that logging roads will disrupt much more than just the logged areas and the noise of the operations will be detrimental to the local wildlife. (Individual, Columbia, MD - #A21226.45623)

The unspoiled forests in Alaska deserve extra protection because of their high level of natural biological richness and the absence of invasive plant species that plagues our California-Oregon landscapes. (Organization, Chico, CA - #A25114.45621)

TO PROTECT OLD GROWTH

I'm a Finish citizen writing from Finland, Europe. Because we have practically no old growth forests left in Finland and in the whole of Europe, I regularly visit Alaska, especially Chugach and Tongass National Forests just to experience these marvelous ancient forests. I would like to point out that Alaska's forests are highly valued not only in the US but also world-wide. Destroyed landscape and logged forests can be found everywhere in the world, but vast areas of unspoiled landscape and wilderness is something I've only experienced in Alaska. (Individual, Helsinki, Finland - #A2789.45622)

The Tongass, and every forest that still exists, is a jewel that should be looked at admired but not touched. Prime old growth habitat, like that found at Southeast Cove and Fool's Inlet near Anan, AK are scheduled to be logged. Those areas of old growth are ideal habitat for grizzlies and Sitka black-tailed deer. Trees that lie within these areas provide shade to cool the waters for salmon to run. Though there are rules stating that there must be buffer zones surrounding streams, these buffer zones are more subject to disease and windthrow because they are exposed. (Union, No Address - #A17699.45623)

I find it appalling that I even have to write this letter after years of comments, meetings, planning, etc on the current TLMP (1999) which protected over 40 roadless watersheds and the additional roadless rule, were decided upon the whole thing is now jeopardized by the short-sighted Bush administration.

I have lived and worked and depended on the Tongass for almost 30 years of my life. I urge you to implement the above mentioned plans and save as much as is possible of the old growth Tongass. We don't need to log this last remaining area for the few temporary jobs it would provide or to line the pockets of timber company owners and executives while leaving nothing for future generations. (Business, Pelican, AK - #A3370.45623)

A roadless area protection policy that excludes the Tongass National Forest, the country's largest national forest, is patently unjustifiable and clearly contrary to sound science.

As 330 eminent scientists said in a letter to President Clinton in December, 1999, "Excluding the Tongass would severely compromise the legitimacy of any national policy on the protection of roadless areas."

Noting that many species depend on the old-growth forests of the Tongass, the scientists wrote: "The ecological characteristics of old-growth forests require centuries to develop. Clearcutting old growth (at 100-200 year rotations) will permanently reduce its habitat value for old-growth dependent species and building new roads will further fragment this important ecosystem." (As the DEIS notes, the Tongass is a naturally fragmented landscape, with some 22,000 islands.) (Organization, Sitka, AK - #A30486.45623)

Unlike most national forests, the Tongass and Chugach still encompass many undisturbed watersheds with a full complement of all native species, including productive populations of bald eagles and northern goshawks, numerous other forest birds, wolves, brown and black bears, moose, black-tailed deer, mountain goats, and five species of anadromous salmon. Proactive application of the roadless policy in Alaska will help forest managers avoid costly and reactive, restoration management. It is critical that we not squander this chance in Alaska because there are few national forests where we still have such opportunities on this landscape scale.

On the Tongass forest, two million acres of roadless areas have been left open to development under the Tongass Land Management Plan (TLMP), including 450,000 acres of roadless old-growth forest. These roadless old-growth areas are especially critical because only four percent of the Tongass land-base encompasses the low elevation, high-volume, old-growth forest most important to fish and wildlife and much of this rare forest type has already been clearcut. The revised TLMP does not prohibit the harvest of the rare high-volume, old-growth forest stands. Even though the allowable sale quantity has been reduced, if there are inadequate provisions to prevent "highgrading" old-growth stands (cutting the best and leaving the low-quality sites), this plan will permanently eliminate important wildlife and fish habitats and erode the integrity of this ecosystem. The committee of scientists the Forest Service asked to review the adequacy of conservation measures for vertebrate species in the Tongass National Forest Land Management Plan recommended cessation of high grading the higher-volume (classes 6 and 7) old-growth stands. (Organization, Anchorage, AK - #A22992.45622)

TO PROTECT WILDLIFE HABITAT

The Forest Service roadless draft EIS specialist report on the Tongass (Johnston, May 2000, Biological Resources Effects) provides several reasons for including the Tongass in the roadless policy.

"The Tongass is unique (from other national forests) because the majority of subsistence and game species are integrally linked to the habitat qualities provided by unroaded areas." "Because relatively little is known about the current status, needs and response to management activities for some species on the Tongass, conservative management approaches that emphasize retention of roadless areas may provide a necessary 'buffer' to ensure higher likelihoods of maintaining biodiversity and species viability."

Forest Service databases on vegetation, the tim-typ database, were developed to characterize timber volume for harvest. The tim-typ layer is one which we documented for our National Spatial Data Infrastructure grant. One of the limitations of this database is that it does not characterize differences among forest stands in terms of forest structure. Forest structure, canopy layering and understory plant type, are important factors in determining habitat quality for wildlife. (Individual, Sitka, AK - #A15506.45623)

Of the 17 million acres of the Tongass, only 1/3 contains commercially productive forest. Only 2 million acres of the Tongass contain high volume forest. And only a portion of that forest is coarse canopy old growth forest with structural characteristics which certain species are dependent upon for survival. These stands are also very valuable for timber harvest, and over time have been high-graded by man. Thus, timber sales have and have had a disproportionate impact on habitat. The roaded areas of the Tongass tend to be in valley bottoms where highly productive stands of timber were targeted. New timber sales are scheduled into adjacent unroaded areas or as entries into locations never before targeted. We cannot

afford to lose these areas. Too much valuable habitat has already been lost. It is not a question of acreage, but of quality. (Individual, Sitka, AK - #A15506.45623)

The TLMP revision process was delayed significantly (from 1986 to 1996) by the need to gather research to resolve state and federal resource agencies' concerns over species viability and resource damage. Many reports were produced during that process detailing the need for habitat conservation areas, streamside buffers, and reassessment of vegetation cover datasets' weaknesses in estimating volume, habitat quality, and forest structure. This research resulted in better standards and guidelines, but which still fell short of recommendations by scientific panels in size of old growth reserves, stand structure characteristics within the reserves, headwater stream buffer protections, and others. The TLMP process violated the NEPA process by failing to consider the addition of more wilderness, a shortcoming which is currently being litigated by SCS and others. Goshawk standards do not adequately protect the huge foraging areas required. The USFandWS has been directed to reassess the goshawk population as part of a lawsuit to have the goshawk listed as an endangered species. TLMP did not take into serious consideration the predictable continued shortfall of funds for road maintenance, and consequent continued resource damage. The recent report documenting the condition of road/stream crossings and fish passage damage was not finished in time to affect the TLMP process. Due to these shortcomings, there were an unprecedented number of appeals filed on the TLMP decision. The Lyons decision, now overturned, to remove some areas from the timber base provided more acreage for habitat, but did not address weaknesses in standards and guidelines. (Individual, Sitka, AK - #A15506.45623)

I would appreciate if some form of permanent protection was placed on the Chugach and Tongass National Forests. Unhindered wildlife is becoming increasingly rare in America, and those national forests serve several very important purposes. (Individual, Fargo, ND - #A25160.45623)

TO SAFEGUARD PRIMARY FISH HABITAT

Including the Tongass in the Roadless Area Conservation plan would safeguard close to 65% of the "Primary Fish Producers" on the Tongass from the harmful effects of roadbuilding and commercial logging, thus retaining a significant number of the existing intact watersheds on the Tongass. In the face of habitat losses elsewhere in the region and the Pacific Northwest, and given the importance of a relatively few watersheds on the Tongass to health and sustainability of the salmon fisheries in Southeast Alaska, expert scientists recommend protecting all the remaining intact watersheds on the Tongass. See Bryant and Everest, *Management and Condition of Watersheds in Southeast Alaska: The Persistence of Anadromous Salmon*, submitted to Northwest Science at 20 (1998). (Organization, Juneau, AK - #A23091.54110)

TO PROTECT NATIVE SPECIES

Unlike most national forests, the Tongass and Chugach still encompass many undisturbed watersheds with a full complement of all native species, including productive populations of bald eagles and northern goshawks, numerous other forest birds, wolves, brown and black bears, moose, black-tailed deer, mountain goats, and five species of anadromous salmon. Proactive application of the roadless policy in Alaska will help forest managers avoid costly and reactive, restoration management. It is critical that we not squander this chance in Alaska because there are few national forests where we still have such opportunities on this landscape scale. (Organization, Anchorage, AK - #A29062.53100)

1352. The Forest Service should include Alaskan national forests in a national roadless rule.

TO REESTABLISH THE BALANCE OF MULTIPLE RESOURCE USE

The roadless policy does not undo the good work of TLMP, but adds to it. The roadless rule is necessary in the Tongass to reestablish the balance of multiple resource use that was lost during the era of the 50 year contracts. (Individual, Sitka, AK - #A15506.10150)

BECAUSE THESE FORESTS SHOULD BE TREATED THE SAME AS ALL OTHER FORESTS

We hereby specifically name the Tongass and Chugach National Forests in Alaska as included in our specific request for roadless protection, because there is too often an unfortunate tendency among some to somehow allege that these beautiful and largely pristine forests, with their immense and important roadless and wildlife resources, are somehow 'different' and should be treated differently than the other forests in our national system.

They shouldn't. Their roadless areas must also have the full protection of a comprehensive Roadless Protection Rule. (Organization, Madison, WI - #A22099.45622)

I am writing this email to ask you to treat the Tongass the same as other National Forests, nothing more. While the final roadless rule protected some Tongass roadless areas, it arbitrarily left many special roadless areas unprotected. The roadless rule should be strengthened to safeguard all the critical inventoried roadless areas on the Tongass, including Totem and Douglas Bays on Kupreanof Island; Cape Fanshaw and Farragut Bay on the mainland near Petersburg; Virginia Lake near Wrangell; Emerald Bay on the Cleveland Peninsula, north of Ketchikan; and Bostwick Inlet and Creek on Gravina Island next to Ketchikan; and Saltery and Sunny Coves, and Clover Bay on east Prince of Wales Island. (Individual, Juneau, AK - #A10396.45623)

I am particularly offended that the Forest Service is considering treating the Tongass differently than other National Forests by minimizing its inclusion in the roadless area rule. There is no legitimate scientific or policy basis for doing so. (Individual, Seattle, WA - #A11644.45623)

Roadless areas of the Tongass fulfill the same functions that make them so valuable to forests in the Lower 48. Besides sheltering wildlife, they provide high-quality fish habitat and support healthy runs of anadromous fish. They provide supplies of clean drinking water. They offer refuges for quiet, wilderness recreation.

The only difference between roadless areas in the Lower 48 national forests and the Tongass is that the Tongass has more of its roadless areas left intact. Are we to infer, then, that business as usual on the Tongass can continue, clearcutting ever more roadless areas, before having to worry about systematically protecting what is left? (Organization, Sitka, AK - #A30486.45623)

BECAUSE THERE IS PUBLIC SUPPORT FOR PROTECTION OF THESE FORESTS

The Forest Service's historic rule to protect 58.5 million acres of roadless areas in our national forests must be preserved and not weakened. We must continue to preserve our remaining pristine forests, especially Alaska's Tongass Rainforest. As a local legislator I know that there is overwhelming support for preservation. This is also evident by the more than 1 million citizens who supported the policy in prior comments to your agency. (Elected Official, Berkeley, CA - #A18120.45620)

Alaskans support Tongass protection! At public hearings held last summer in Southeast Alaska, about 60% of those testifying supported immediate protection of the Tongass. (Individual, Bainbridge, WA - #A10563.45623)

AS A COMMITMENT TO GLOBAL RAINFOREST CONSERVATION

Protect all roadless areas in all National Forests. The policy should provide protection to the Tongass National Forest, which, as America's largest and wildest National Forest and the heart of the last great temperate coastal rainforest on Earth, is a key test of our country's commitment to rainforest conservation. (Organization, Plymouth, MN - #A7116.45620)

The Tongass's vast expanse of coastal rainforest in southeast Alaska supports abundant wildlife, including the world's largest concentrations of grizzly bears and bald eagles. The new Forest Service ban on roadbuilding and commercial logging in unspoiled areas of national forests, coupled with the closure of the last subsidized Tongass pulp mill in 1997, offer a unique opportunity—one that

Americans favor overwhelmingly - to save the millions of acres of this ancient rainforest still standing. (Individual, Mason City, IA - #A10326.45623)

The Tongass must be protected. How can we be concerned about the rainforests of the tropics when our own temperate rainforests are being destroyed? Forests of large trees are the ideal vegetation for an area with that much rain. They soak up the water and recycle it into the atmosphere.

Erosion can be extremely severe in a steep and rainy area such as SE Alaska. I hoped that when the contracts with the Japanese companies were ended, the Tongass had a chance, but it always seems to be threatened again. Please don't sacrifice it. (Individual, Northfield, MN - #A22395.45623)

1353. The Forest Service should include Alaskan national forests in a national roadless rule for economic reasons.

BECAUSE OF THEIR IMPORTANCE TO THE LOCAL ECONOMY

The Chugach National Forest was established primarily to protect its fish, wildlife and recreational resources. Much of the Chugach is roadless and provides exceptional opportunities for outdoor recreation, including fishing, hunting, kayaking, hiking, skiing, wildlife viewing, and photography, as well as an expanding tourism industry. Compared to the Tongass, the availability and value of timber are much lower on the Chugach. In terms of sustainable economics, the fish, wildlife, and recreational values of the Chugach certainly outweigh even a small-scale commercial timber industry. (Organization, Anchorage, AK - #A29062.45100)

Members of the Alaska Center for the Environment both use and reside within communities nearby the roadless areas of the Chugach and Tongass National Forests. Our members rely on these intact forest lands, rivers and wetlands for activities including hiking; camping; sport and subsistence hunting; sport, commercial and subsistence fishing; kayaking; wildlife viewing; backpacking and general aesthetic enjoyment and solitude. ACE members also include Alaskan small business owners involved in low-impact commercial operations that include tourism enterprises, cottage industries and photography whose profitability is directly linked to protection of forest resources and wilderness character.

Because their activities are incompatible with roads, commercial logging, mining, and oil and gas development, our members will avoid areas with these impacts. Our members seek roadless areas for their recreational, subsistence, economic and spiritual fulfillment. If the roadless rule is revoked, given loopholes or changes, held in violation of law or enjoined, ACE and its members will be irreparably harmed. (Organization, Anchorage, AK - #A23038.45622)

I support including the Tongass National Forest in the Roadless Rule. The large-scale clear-cutting that has occurred in this forest is a travesty—to blot the environmental legacy of every administration that allows it to continue. There is absolutely no excuse for allowing this assault on the environment to continue.

Economically, the large-scale clear-cutting has allowed a couple of large corporations to profit at everyone else's expense. American taxpayers have largely unknowingly subsidized—for total of over half a billion dollars since 1992—hundreds of miles of roads through old-growth rainforest. Native Americans have watched their subsistence lands and game populations diminish to the point where further declines in habitat will—without question according to wildlife biologist in the area—lead to a shortage of deer and increased conflict among users (Ecotrust, "Forest Condition in Southeast Alaska," 1999), Local businesses such as forest products, commercial and sport fishing, and ecotourism have been stifled because of their inability to compete-or-exist-with the heavily subsidized logging giants.

Lack of economic diversity has affected regional economic health. With the closing of two pulp mills this decade, the regional economy is changing rapidly with a growing emphasis on activities that build on the natural wealth. According to research by Ecotrust and others, significant opportunities in ecotourism, small scale, value-added forest products and seafoods are part of the emerging economy. Subsistence and traditional use also remain a major element of community life. Based on 1990 census

figures, residents of Southeast [Alaska] harvested over 6.4 million pounds of wild foods—at a replacement cost of $5 per pound, this represents an annual value of $32 million.

Including the Tongass in the Roadless Rule and protecting the remaining roadless areas will help residents meet the needs of the future rather than prolong past mistakes. It will save taxpayers money—and it won't exclude logging because the existing roads network can be used to access timber outside of roadless areas. (Individual, Cordova, AK - #A8044.45623)

Please do not allow any exemptions or exclusions that would undermine or weaken the Roadless Area Conservation Rule. For example, Alaska's Tongass and Chugach National Forests much in included in any national prohibition on logging and roadbuilding. Exempting them would permanently damage the biological integrity and ecosystem health of our large remaining temperate rain forests. It would also make no sense economically, as taxpayers stand to lose million of dollars from the below-cost timber sales. Recreational use by hikers, bikers, boaters, and other non-extractive users brings in most of the money that our national forests contribute to the national economy. (Individual, Auburn, CA - #A30708.45623)

BECAUSE MANY ALASKANS RELY ON SUBSISTENCE FOOD

I implore you to include the Tongass and Chugach Forests in the roadless protection rule as it was written into the Federal Register on Jan. 12, 2001.

We depend upon subsistence fishing, crabbing, shrimping and occasional hunting around the Tenakee Inlet area for a large part of our existence. We also gather and use berries and local vegetation in our diet. (Individual, Tenakee Springs, AK - #A26905.45622)

As a Southeast Alaska resident, I am writing to express my desire that the U.S. Forest Service maintain the roadless area protection rule recently adopted for the Tongass National Forest. Intact roadless watersheds on the Tongass should be protected and additional road building in the Tongass should be prohibited. New road building and associated timber harvesting will adversely impact my use of forest resources. I depend on the Tongass to provide myself and family with salmon, wild berries and other traditional foods. We also depend on the forest for wilderness recreation. These activities would be negatively impacted by new road building. (Individual, Juneau, AK - #A29872.45623)

In addition to wage employment, traditional gathering of subsistence foods plays a substantial role in Southeast Alaska's rural communities. Since time immemorial, subsistence has been a way of life and culture for Alaska Natives. Non-Native immigrants to the region have also learned to rely on harvest of wild game and fish. Eighty-five percent of the rural households in Southeast Alaska harvest some kind of subsistence food and nearly one-third of rural households supply half their need for fish and meat by hunting and fishing. Subsistence may provide 70 to 80 percent of the protein consumed in less accessible households in the Gulf of Alaska region. Reductions in wildlife and fish populations threaten the foundation of Native culture and the classic Alaskan tradition of living off the land. (Individual, Ashland, OR - #A23399.45623)

BECAUSE TIMBER SALES ARE NOT ECONOMICALLY VIABLE

Timber Sales in the Tongass do not make fiscal sense. The taxpayers of the US lose money. According to the Roadless DEIS, timber sales in the Tongass result in a net revenue loss of $178 per thousand board feet of timber (p. 3-184). If the Tongass National Forest sells 539 mmbf of roadless area timber over the next 5 years as planned, the total net loss to the government, according to the Forest Service, would be about $96 million. This is likely a conservative estimate, since the agency typically underestimates the costs of its timber program. (Individual, Sitka, AK - #A15506.45626)

It makes absolutely no sense to: build roads, log, mine or drill the National Forest in Alaska. The cost of harvesting is too great for a fair return to the government. In essence, the Alaskan trees are just given away to anyone that will remove them. The MFB (or ton) prove is so low that there is absolutely no

public benefit from this type of operation. However, there is public benefit for recreation in an uncut forest. (Individual, Shreveport, LA - #A24980.45622)

BECAUSE TOURISM INDUSTRIES DEPEND ON THE TONGASS NATIONAL FOREST

Our business is built around and dependent on our wild forests, which is why we support the PERMANENT PROTECTION of Chugach and Tongass National Forests, and would like to see the Roadless Rule implemented as it stands. (Business, Homer, AK - #A15420.45620)

As professional wildlife photographers, our business is built around and dependent on our wild forests, which is why we support the permanent protection of the Chugach and Tongass National Forest, and hope you implement the Roadless rule as it stands. (Business, Anchorage, AK - #A14076.10150)

Salmon require clean, clear and cold streams to successfully spawn. The sedimentation of rivers due to high runoff caused by logging reduces the number of fish. This effect does not take years to be noticed. It is immediate and long lasting. The soil on the islands of Southeast Alaska is only 2-8 inches deep. This thin layer is easily washed away by the precipitation of a temperate rainforest.

Fishing is more than a way of life here in Alaska. Salmon and steelhead trout bring tourism and commerce to communities across the state. I urge you to consider the drastic damage that logging has inflicted on salmon populations in the Tongass National Forest. (Individual, No Address - #A10390.45623)

We request the Forest Service include the Tongass National forest in the roadless policy. Our fly fishing business, which operates on streams throughout northern Southeast Alaska, depends on healthy watersheds and streams to provide catch and release fishing opportunities for salmon, Dolly Varden, cutthroat and steelhead. Our trips are also enhanced by the remote "wilderness" experience, which are still available in many non-roaded areas.

The Forest Service has the opportunity to provide additional protection to a national forest that is home to some of the large intact wild salmon and steelhead runs in the world. Roadless protection would not only benefit businesses like ours but also subsistence users, sport and commercial fishermen. (Business, Juneau, AK - #A28683.45623)

BECAUSE ROADLESS AREAS SUPPORT THE COMMERCIAL FISHERIES IN ALASKA

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, Plymouth, MN - #A7116.75000)

I am writing to express my disapproval of the recent attempts by the Bush Administration to overturn the current protection of roadless areas on Alaska's Tongass. A resident of Tenakee Inlet has drawn my attention to this issue. This proposed policy change would affect Crab and Saltery Bays in the Inlet. If logged or clear cutting were allowed in Tenakee Inlet, it would not only affect the majestic view, but also destroy people's way of life. There are hundreds of Inlet locals who rely on the land and inlet to provide for their families. Commercial fishing is the area's largest employer. These men's entire livelihood is tied to the salmon population. In fact, 80% of all of Southeast Alaska's salmon need the streams of the Tongass for spawning and reproducing. According to the Forest Service and Alaska Fish and Game, as many as 66% of logging roads cross over active salmon reproductive streams and 85% of resident fish streams crossing are not adequate for fish passage. (Individual, Cambridge, MA - #A19185.75400)

I am a 26-year resident of Southeast Alaska, in the heart of the Tongass National Forest. My two sons, husband, and I commercial fish for salmon, as well as other fish and crab species in the waters

surrounding the Tongass. Our livelihood depends on the health of the habitat for those species, both upland and marine. As you know, anadromous habitat, as well as marine ecosystems are directly and adversely affected by logging, mining, road construction, and other development activities. (Individual, Petersburg, AK - #A5427.75500)

One thing I learned really caught my eye; the Forest service and Alaska Department of Fish and Game report that as many as 66% of the logging road culverts over anadromous fish streams, and 85% of resident fish stream crossings, are not adequate for fish passage. Now, commercial fishing is the area's largest employer, much more important than the logging industry. And eighty percent of salmon in Southeast Alaska spawn in Tongass streams. So why should the logging industry be favored over the fishing industry? (Individual, Juneau, AK - #A23012.75500)

1354. Public Concern: The Forest Service should immediately implement the Roadless Area Conservation Rule in the Tongass National Forest.

SCHEDULED TIMBER SALES MAKE THE RULE EVEN MORE NECESSARY

I do not believe that it is possible to defer the implementation of the roadless policy in the Tongass. Over 500 mmbf of harvest from roadless areas is scheduled in the next 5 years, more than twice that scheduled for the entire remainder of the National Forest System. 75% of the total Tongass timber harvest will come from roadless areas, including St. John the Baptist Bay, Schulze Cove, Cape Fanshaw, Bradfield Canal, Gravina Island, and Moira and Chomondeley Sounds on Prince of Wales Island. With the exception of Prince of Wales, I have been to the other locations. I do not want to see the wild character of these special places lost. I want to be able to visit these locations on Prince of Wales Island and see them as they are today. (Individual, Sitka, AK - #A15506.45623)

The Cholmondeley timber sale, one still allowed under the roadless policy, is an example of this problem. It is bitterly opposed by business owners living in the project area. "The Cholmondeley Project Area was given the highest priority (in the South POW Planning process) because of the large expanses of potentially suitable timber. Through further analysis, the ID team determined that much of the project area was isolated, low-volume timber, and only three areas of forest provided economical timber harvest opportunities" (Cholmondeley DEIS, p.2-1) The Moira sale, if allowed to proceed, will be an even more desperate example. (Individual, Sitka, AK - #A15506.45626)

I would be disgusted to hear of any exception or exemption to the Roadless Area Rule for the Tongass National Forest—or any other. It would seem to me to be a cynical and subversive bid by some to attempt to road and log as much as possible within the years exemption proposed. There should be no exceptions to the Roadless Area protection rule. (Individual, Vashon, WA - #A27214.45623)

1355. Public Concern: The Forest Service should not use the fact that the Tongass National Forest has a recently revised forest plan as a reason to exclude it from a national roadless rule.

When will the policy apply to Alaska's Tongass National Forest? *Its recently revised Forest Plan should be no grounds for exemption, (even if Senators Young and Murkowski sit at the helms of Interior Appropriation and Natural Resource Committees.) A national conservation policy of this caliber should not be bogged down by special interests of extractive industries and their cohorts in congress.* ***A National RA policy should not be riddled with exceptions.*** (Organization, Albany, OR - #A19057.45623)

The past justifications for exempting the Tongass from new roadless area protections are unquestionably economic and political, rather than scientific. Consider the following rationales the Forest Service has offered for the Tongass exemption, in the EIS or other public forums:

1. We just finished an expensive and time-consuming forest plan revision that protects a lot of roadless areas.

2. Economic dislocation would be too severe from the reduction in roadless area timber cutting.

3. We'd have trouble trying to meet market demand for timber, as supposedly required by law (The Tongass Timber Reform Act).

This is not a sound rationale. The Tongass is no different from many other forests that have also had plan revisions or amendments in recent years, including plans with significant land protections like those in the Tongass. The entire premise for the proposed rule is that there is a need for national level direction on roadless areas that is not adequately met through the forest planning process. EIS, 1-10 ("Given the history of controversy surrounding the management of roadless areas and the level of interest expressed by the public, the agency has determined that there is a need for national level direction for roadless area management."). The proposed rule incorporates new approaches to roadless area management nationally that are not reflected in the TLMP Revision or any other forest plan. The reasons cited for national level direction in the EIS are as applicable to the Tongass as to any other forest, notwithstanding the TLMP Revision.

Only 4% to 5% of the Tongass includes the high-volume old-growth forest most critical to fish and wildlife protection and also most economically valuable to the timber industry. The most valuable high-volume timber has already been harvested in southeast Alaska. The Native corporations selected the most valuable remaining timber lands in southeast Alaska. This fact and the early industry high grading has resulted in the loss of about 70% of the most productive old growth timber throughout southeast Alaska. This situation significantly reduces forest diversity and poses a substantial risk of long-term population declines of many populations including salmon, brown bears, wolves, and goshawks. Protecting the remaining roadless areas offers some hope of balancing this serious inequity.

For these reasons, the TLMP Revision does not set the Tongass apart from any other national forest, including those with recent forest plan revisions or amendments. Accordingly, the TLMP Revision is not a sound basis on which to exclude the Tongass from the proposed rule. (Organization, Sitka, AK - #A30486.45623)

American Lands strongly believes the final rule must incorporate the best available scientific information. With that in mind, we urge the Service to implement a policy that includes all biologically important roadless areas within the National Forest System. NO AREA, INCLUDING THE TONGASS NATIONAL FOREST, FORESTS IN THE NORTHWEST FOREST PLAN, AND MANY ROADLESS AREAS LESS THAN 5,000 ACRES, SHOULD BE EXEMPTED FROM THE PLAN.

There is no scientific justification for the exemption of these lands from roadless area protection. A new Tongass forest plan would convert 400,000 roadless acres to roaded status on the Tongass every decade. Thus, roadless area protection is very much needed on the Tongass . . . . Administration officials have argued that, with a solution (the Northwest Forest Plan) already in place for Northwest forests, no further management changes are needed for the region. Yet roadless area sales are being justified in the Gifford Pinchot National Forest (GPNF). The Service is "committed to sell a certain volume of timber each year—goals that cannot be met if it stays out of every roadless area," a spokesman for the GPNF told the Tacoma News Tribune in 1999.

Because few of those areas identified by the RARE I and RARE II processes were protected and the inventories were incomplete, many areas still intact are sure to slip through the cracks. Roadless areas in the Sierra Nevada that deserve protection may not be spared from logging and road building. For example, in the Tahoe National Forest, which has nearly 3,000 miles of roads, forest activists found that Devils Canyon, which contains the largest stand of old growth trees in Nevada County, Lafayette Ridge, which also has old growth, and an area near Downieville and north of New York Ravine, which is important springs habitat to four rare subspecies of Caddis fly, could be logged and roaded because all three areas are less than 5,000 acres and may be overlooked by the Regional Forester. (Organization, Nevada City, CA - #A4941.45621)

The Proposed Changes included exempting forests which have a revised forest plan. This singles out the Tongass (the only forest so far to have revised its forest plan), even though the forest plan revision was

made prior to the January publication of the roadless rule. The revision of the Tongass Land Management Plan did not adequately consider protection of roadless areas or the recommendation of Wilderness designation. This lack is currently the subject of a lawsuit. Therefore, no exemptions should be given on the basis of whether or not a forest plan revision has been completed. (Individual, Sitka, AK - #A24495.45623)

A recent report, Deconstructing the Timber Volume Paradigm in Management of the Tongass National Forest, (Caouette et al, March, 2000. Pacific NW Research Station PNW-GTR-482) shows how the Forest Service relied on unsuitable data to manage the ecological health of the forest, and therefore failed to maintain that health. The Tongass is a unique forest ecologically because it is naturally highly fragmented and patchy in forest character and value. It has been extensively high graded. The most productive valley bottoms, with the rarest and most valuable forest structure for wildlife habitat, were logged first. Because of that, nothing we do right in the future can repair what we have done wrong in the past. We have put old-growth dependent species at risk. Standards and guidelines in the 1999 Tongass Land Management Plan are not comprehensive enough to ensure that populations can remain viable. (Individual, Sitka, AK - #A15506.45623)

Your recent actions also appear intent on removing protection from the greatest national forest created by Theodore Roosevelt, Alaska's Tongass National Forest. I am strongly opposed to any effort to modify the Jan. 12 roadless policy as it applies to the Tongass.

I am especially concerned regarding an apparent presumption that the Tongass Land Management Plan adequately addressed roadless issues on the forest. This conclusion appears to have been reached in spite of the fact that the plan was concluded years before the roadless policy existed and that TLMP has been set aside by a federal district court decision, in part, over its treatment of roadless areas.

Alone among forests in the National Forest System, the Tongass still contains large blocks of fully functioning old growth ecosystems not yet impacted by industrial logging and associated roadbuilding. I would observe that your agency's own analysis recognizes the importance of the inventoried roadless areas on the Tongass in providing the Forest's "high degree of biological integrity and overall ecosystem health" (p.3-26 Roadless DEIS). This point of view is also shared by 330 of the nation's leading ecologists and biologists that in a December 20 letter to President Clinton declared that the Tongass "still encompasses many undisturbed watersheds with a full compliment of all native species." The scientists correctly point out that it "has been consistently demonstrated that roadless areas are crucial to the protection of our nation's wildlife, fisheries and water resources.

However, much of this low-elevation, high quality wildlife habitat has already been developed on the Tongass. According to the scientists, the roadless reserves are "especially critical because only four percent of the Tongass land-base encompasses the low elevation, large old growth most important to fish and wildlife and much of this rare forest has already been clearcut." Therefore, failing to apply the roadless protections contained in the January 12 rule will merely hasten the day when the Tongass resembles the cut over forests of the Pacific Northwest. I speak from first-hand observation when I say that many areas of this magnificent rainforest already do, such as Central Prince of Wales Island and Zarembo Island. I conclude my comments on the Tongass with another observation from the scientist's letter. The scientists correctly maintain that "there is no scientific basis to exclude the Tongass National Forest from the Forest Service's national roadless policy". Furthermore, they hold that "excluding the Tongass would severely compromise the scientific legitimacy of any national policy on the protection of roadless areas in our National Forest System." (Individual, Alexandria, VA - #A22990.45623)

Exclusion

1356. Public Concern: The Forest Service should develop additional criteria to provide guidance to forest managers regarding areas that should be excluded from the Roadless Area Conservation Rule.

DUE TO PRIOR DEVELOPMENT ACTIVITIES

This direction leaves unclear exactly where the developed portions are located and available for additional timber harvesting (provided the prescription for the area allows such activities.) When the reexamination of areas eligible for roadless status is conducted during revision of the forest plan, this uncertainty is removed because boundaries of roadless areas are clearly delineated, and the areas to which the roadless conservation rule applies is delineated. However, until the delineation of roadless areas is conducted as part of the revision of a forest plan, additional criteria should be developed in the Forest Service Handbook. These should provide more specific guidance to the Forest managers about areas that should be excluded from application of the rule due to prior development activities. (Civic Group, Roanoke, VA - #A1713.65241)

1357. Public Concern: The Forest Service should exclude certain roadless areas from roadless designation/protection based on development potential.

EXCLUDE AREAS ADJACENT TO DEVELOPED RECREATIONAL SITES

Not all inventoried roadless areas are equal. Conditions on NFS lands have changed in the past two decades, and as a result not all inventoried roadless areas have the same importance or value. Some roadless areas have become significantly smaller in size—others may have roads and other nearby developments that diminish roadless values. For example, roadless parcels adjacent to ski areas may be roadless, but not have the full range of natural characteristics that would commonly be associated with a roadless designation. These areas are not remote, are not undisturbed landscapes, and inevitably are influenced by nearby ski area operations. Generally speaking, areas immediately adjacent to developed recreation sites should not be considered for roadless designation. (Permit Holder, Hood River, OR - #A13230.45617)

EXCLUDE SPECIAL USE PERMIT AREAS OR MASTER DEVELOPMENT PLAN AREAS

For Northwest ski areas not under the jurisdiction of the NFP, exceptions should be allowed when the risks of fire or disease are present. Exceptions also should be made for existing, reserved, or outstanding rights so that roadless prohibitions do not get applied within special use permit (SUP) or master development plan (MDP) boundaries. Consistent with the original January 12, 2001 rule, management of roadless areas should "not suspend or modify any existing permit, contract, or other legal instrument authorizing the occupancy and use of National Forest System lands." Finally, any timber cuts incidental to management activities other than road building, such as trail construction or maintenance, should be permitted. (Permit Holder, Hood River, OR - #A13230.45617)

A further remedy would be to include in any action or decision an exemption excluding all lands in the National Forest system, and as to DCC, those areas within the INF, previously identified for resort or recreation site development or expansion from consideration in the Roadless Initiative. This would include all lands within the SUP boundaries of SSA, those identified in master development plans, those lands designated in forest plans for potential ski area development, and Management Prescriptions 13 and 14 in the INF Forest Plan. (Business, Mammoth Lakes, CA - #A30296.45500)

It appears that the following areas are proposed to be included and subjected to the Roadless Area rules:

Section 8, Township 12 North, Range 19 East, Mt. Diablo Base and Meridian;

The southern portion of Section 4, Township 12 North, Range 19 East;

The northern portion of Section 9, Township 12 North, Range 19 East; and

The eastern portion of Section 7, Township 12 North, Range 19 East.

The lands proposed for inclusion lie immediately adjacent to the 4,500 acres of land presently under Term Special Use Permits to Heavenly (permits #4056/01 and #4056/02), or adjacent to private held lands which Heavenly owns or controls. In fact, the entire area of Section 7 is already within Heavenly's Special Use Permit boundary and is used for downhill skiing.

They are adjacent to an existing winter sports ski resort that is under an approved Forest Service Master Development Plan and adopted by several other governmental agencies with jurisdiction. The Master Plan was approved in 1996 following an interdisciplinary planning process. The approved master plan is required to be reviewed and updated at regular intervals. Work on the update will begin early in 2002. Beginning in 1998, Heavenly has had discussions with local Forest Service official's plans regarding a possible realignment of a portion of the Term Permit boundary in part to include the sections of land or portions thereof, which are indicated above. By that time, the roadless area boundary had been drawn. The area in question (identified above) does not meet the letter or the spirit of roadless area; the parcels are surrounded by private lands on either two or three sides, and lie at the edge of the existing residential development along the western side of the Carson Valley. The valley's character has changed to a much more urbanized landscape. Many nearby residents use the adjoining National Forest lands for a variety of purposes.

The local Forest Service office has requested that we consider jointly amend the existing Heavenly Ski Resort permit boundary to delete certain lands from the area under permit which are clearly not needed for current of future resort use permit. In cooperation with the Forest Service, Heavenly is considering proposing to add portions of the land identified above to its permit. Adding the lands will not only enhance the mast plan as descried below, but will consolidate lands for management purposes, and will help to offset the potential loss in revenue to the local county government under whose jurisdiction both areas lie.

It appears that the proposed roadless area boundary was simply drawn along the edge of an existing electrical transmission line. There was very little coordination between Heavenly and the Forest Service, thereby, missing an excellent opportunity to share knowledge regarding the master plan and the impacts of this proposal.

Inclusion of these areas within Heavenly's Special Use Permit boundary (i.e., not subject to the proposed Roadless Area rules) would allow a continuous connection to be developed between a potential base area at the bottom of the slopes near the Kingsbury Grade (Nevada State Route 207), on land which Heavenly controls, and the existing resort facilities located on the Nevada side.

The ability for the public to access the resort in this manner ensures that the Forest Service and Heavenly will continue to provide a high-quality public outdoor recreational experience, and, that transportation impacts to the existing road network, particularly those on the Kingsbury Grade and in the Lake Tahoe Basin are minimized by providing public access at the bottom of the hill and then transporting visitors onto national forest lands using ropeway forms of transportation.

The opportunity exists for these lands to help meet the expanding recreational needs of the public. Prohibiting future construction or reconstruction of roads will foreclose that recreational opportunity.

Portions of the lands identified above already contain roads which are non-system roads that connect private lands managed for like purposes.

Any new roads which may be constructed to provide access to new skiing facilities are expected to be designated as non-system roads but will be constructed and maintained so as to have minimal environmental impact under the direction of the Forest Service watershed staff using private dollars.

Any new roads which may be planned as a part of the Master Plan process will be subject to full NEPA disclosure and analysis, including the mitigation of any identified impacts to less than significant levels. (Permit Holder, Stateline, NV - #A21708.45617)

EXCLUDE AREAS WITH EXISTING OR FUTURE OPERATIONS AT FOUR-SEASON RESORTS WITHIN OR ADJACENT TO EXISTING OR FUTURE SPECIAL USE PERMIT BOUNDARIES OF SKI AREAS

The Forest Service should revise the proposed roadless area rules to clarify that they do not apply to existing or future operations at four-season resorts within existing or future special use permit boundaries. This would have little effect on the conservation of 58.5 million acres of roadless areas

nationwide. It would likely involve only a tiny amount of inventoried roadless areas (many of which are now roaded) and would have a positive effect on the agency's ability to accommodate existing recreation and future increases in demand.

Therefore, in addition to exemptions for fire and other natural hazards and valid existing rights discussed above, Vail Resorts urges the agency to clarify that an exemption from roadless rule prohibitions would be available for operations within current and future special use permit boundaries, one which includes unroaded areas and inventoried roadless areas immediately adjacent to existing ski area sites, particularly where those areas and/or sites are currently allocated to four-season recreation or are under consideration for such allocation by forest plans. In order to avoid the undesirable forecast of higher density recreation at developed recreation sites, ski resorts need the flexibility to improve and expand their offerings in the future. Such an exemption also would acknowledge that lands adjacent to existing ski areas (and perhaps to other developed recreation sites, as well) are already likely impacted to some degree and such existing impacts may be inconsistent with the full range of roadless characteristics and values. The Forest Service should clarify this ambiguity by revising the Final Rule that its prohibitions do not apply to operations within or adjacent to the existing or future special use permit boundaries of ski areas.

Importantly, this appears to be the intent of the Final Rule. Although the January 2001 Final Rule would generally prohibit the construction or reconstruction of roads and the cutting and removal of timber in inventoried roadless areas, the Forest Service stated that the Final Rule does not apply to certain ski area operations. Specifically, the Forest Service stated that:

New ski areas or other activities outside of existing special use permit boundaries that do not require road construction, but require timber harvest, may be allowed in inventoried roadless areas, if approved by the local Responsible Official. (Permit Holder, Avon, CO - #A28852.45600)

EXCLUDE AREAS USED FOR PIPELINE TRANSPORTATION AND OIL AND GAS DEVELOPMENT

Williston Basin is a natural gas transporter, operating storage fields and over 3000 mile of pipelines throughout its traditional service territory in Montana, Wyoming, North Dakota and South Dakota. Williston has operated a transmission pipeline crossing the Little Missouri National Grasslands in North Dakota since 1930. The original pipeline was replaced and relocated within another corridor several miles north of the original corridor. The Roadless Initiative could prevent pipelines from crossing lands that may indeed be less environmentally sensitive than other potential routes.

Williston Basin is opposed to the Roadless Initiative and urges the Forest Service to reconsider implementing this rule or exempt pipeline transportation and oil and gas development from the Roadless Initiative. By utilizing proven, modern technologies, the development, production and transportation of oil and gas reserves in these areas can be accomplished with only minor and temporary (if any) impacts to the environment. Once a site has been abandoned it is reclaimed to and, in most cases, better than original site conditions. Pipeline rights-of-way generally revegetate within the first and second growing seasons, and by utilizing best management practices soil erosion can be virtually eliminated. (Business, No Address - #A29748.45610)

As a transporter of natural gas in interstate commerce, Williston Basin is dependent upon the oil and gas industry being allowed to explore for gas reserves, develop them and transport the gas on the Williston Basin system. A portion of this gas (gas associated with oil production) is currently being produced and gathered from Forest Service lands within the Little Missouri National Grasslands. Continued use of these lands (and other lands included in the Roadless Initiative) for the production and transportation of the gas is also necessary to ensure any users an ample supply of natural gas and products derived from crude. For example, the Tesoro Refinery in Mandan, North Dakota received all natural gas used for fuel and/or processing from the Williston Basin pipeline. This refinery also receives much of its crude from the grasslands. By eliminating potential new wells and pipeline rights-of-way, continued operation of the refinery is at risk. The local and state economies are very dependent upon the refinery. (Business, No Address - #A29748.45610)

1358. The Forest Service should exclude certain roadless areas from roadless designation/protection based on geographical location.

EXCLUDE AREAS IN THE WESTERN UNITED STATES

We are concerned that so much public land in the west is designated as public. A basic concern is that much of that land should be returned to the states. Why should those with larger populations in the East be allowed to rob and keep lands from those on the West? If more wilderness is desired, let all Chicago inhabitants be relocated, and wolves and bears reintroduced in Illinois, while the "wilds" are allowed to take over again as all mankind is kept away. Then let Philadelphia be next, then Atlanta and other parts of the East and South. Go pick on someone else rather than westerners. (Individual, Salt Lake City, UT - #A19191.45341)

EXCLUDE NATIONAL GRASSLANDS

North Dakota contains 1.05 million acres of land in the National Forest System. Of these, 266,000 acres are considered inventoried roadless areas. As opposed to much of the land designated roadless in the Forest System, North Dakota's portion is primarily not forested and is instead contained within three National Grasslands.

The greatest concern that I and many others in North Dakota have had with regard to the roadless rule is its application to a wide range of public land without consideration of locale-specific concerns. Roadless rule restrictions were originally designed for implementation on forested land. Placing the National Grasslands under the umbrella of the roadless area initiative ignores the quite significant difference between the landscapes of grasslands and forests. Given that one of the primary purposes of the initial roadless rule was the protection of forested lands for intensified logging, I cannot imagine how the inclusion of grasslands would contribute to this goal.

The inclusion of grasslands in the roadless initiative is further complicated by the comprehensive grasslands management plan proposed for the Dakota Prairie Grasslands as part of the U.S. Forest Service regular review process. The Final Environmental Impact Statement has been recently released, and comments will be taken for six months (up to January 22, 2002) prior to signature of the Record of Decision. While this management plan is still being evaluated and is certainly not perfect, it does reflect a more site-specific approach for public land management. If such plans are to be valid, they must incorporate such local decision-making plans into any national rule-making. (United States Representative, North Dakota - #A23212.45340)

I believe that any rulemaking relating to roadless areas must exclude National Grasslands from applicability of the rule, due to their significant difference from forested lands. Barring an outright exclusion, the local grasslands Management Plan should be considered with implementation of any roadless rule, and special emphasis should be paid to the impact (both economic and social) on local communities from the implementation of roadless restrictions, including loss of revenue and jobs due to mineral extraction restrictions.

I certainly appreciate the considerable work that was done and continues to be done to create a workable initiative, and I recognize the attempt to reduce road maintenance backlog within the agency and focus most on current roads. However, I believe the roadless rule as it currently stands and applies to grasslands is unacceptable. (United States Representative, North Dakota - #A23212.45340)

1359. The Forest Service should exclude certain roadless areas from roadless designation/protection based on forest plan status.

EXCLUDE AREAS THAT HAVE RECENTLY COMPLETED FOREST MANAGEMENT PLANS

Our State Society also did not agree that the Roadless Rule should include the Black Hills National Forest because it had just finished a new management plan only a short time before the Roadless Rule process was initiated. We found it inconsistent that the Chief of the Forest Service had signed off and agreed with the management directions of Black Hills National Forest roadless areas only a year earlier. (Professional Society, Rapid City, SD - #A21751.12230)

Exceptions must be allowed. Under the interim rule that suspended road building, the agency exempted Northwest Forest Plan (NFP) forests because of the scientific input gathered during the ecosystem management assessment team process (begun in 1993). Scientific analysis of the ecosystem, and related watersheds, led to the issuance of the NFP record of decision, and subsequent revisions to the NFP. This forest planning process was subject to an exhaustive public comment period, and the implementation of the revised NFP led to a new management direction for the forests under the jurisdiction of the NFP. (For every development proposal, the NFP requires a companion strategy for maintaining and enhancing overall watershed health.) The Association believes a new set of guidelines for the protection and management of roadless areas will lead to great disruption in the management of NFP forests. Many of the PNSAA's ski areas are located within NFP forests. For this reason, the Association urges the Agency to exempt the forests covered by the NFP from any future roadless conservation rule. (Permit Holder, Hood River, OR - #A13230.45610)

1360. Public Concern: The Forest Service should exclude Alaskan national forests from a national roadless rule.

BECAUSE INCLUSION OF ALASKA'S NATIONAL FORESTS WOULD BE CONTRARY TO ALASKA STATE AND FEDERAL LAWS

We strongly oppose the rule, especially its application to the Tongass and Chugach national forests in Alaska. Including the Tongass in the final rule prohibits the Forest Service from complying with the Tongass Timber Reform Act (TTRA) and the Alaska National Interest Lands Conservation Act (ANILCA). (Business, Juneau, AK - #A11824.45613)

Inventoried roadless areas should be evaluated based on a consideration of all the relevant factors. These include the requirement to provide for multiple use of the national forests and the sustained yield of products and services from those forests as required by the Organic Administration Act, the Multiple-Use Sustained Yield Act, and NFMA. They also include factors such as social and economic needs and providing for community stability. With respect to the Tongass, the Forest Service must also consider the Tongass Timber Reform Act (TTRA) requirement that it seek to meet the demand for timber from the Tongass.

The Forest Service should consider that each forest has unique characteristics and that local communities depend on the national forest in varying degrees for their economic, social and environmental health. Application of the present Roadless Rule prohibitions to the Tongass failed to recognize these considerations and is contrary to ANILCA, NFMA, TTRA and the other forest planning laws. (Manager, City of Wrangell, AK - #A17670.45100)

Application of the roadless rule to the national forests in Alaska essentially means no more logging because there has been such limited access into the forest. Timber in areas where roads have been built won't be old enough to harvest for at least 65 more years. Given Sections 708 and 1326 of ANILCA, it is clear that the roadless rule cannot be applied to National Forests in Alaska and that the forest planning process is the only way in which environment, social and economic values can be achieved in a balanced way. (Individual, Sitka, AK - #A12821.45611)

In conclusion, the Forest Service's proposal to eliminate road construction activities in roadless areas on the National Forest System, and to develop regulations for the protection of roadless areas as roadless areas, cannot lawfully be adopted or applied to the Chugach National Forest or Tongass National Forest because the proposal (1) violates existing law with respect to the forest planning process, (2) conflicts with provisions of ANILCA prohibiting wilderness studies and the creation of new conservation systems units, (3) violates the Forest Service's multiple-use mandate by effectively prohibiting resource development in the Chugach and Tongass National Forests, (4) unjustly frustrates value existing rights of access to private inholdings across federal lands administered by the Chugach National Forest, and (5) violates NEPA by failing to adequately and accurately analyze all issues and concerns in the FEIS. The Forest Service should withdraw the proposal or adopt Alternative 1 - No Action (no rule prohibiting

activities in inventoried roadless areas would be issued). (Professional Society, Anchorage, AK - #A21707.45612)

Sealaska determined that the Proposed Rule was inappropriate as a National policy; and specified that it should not be applied to the Tongass and Chugach National Forests.

Our understanding is that effective July 27, 2001 Interim Directive No.: 7710-2001-2 part 7710.4 states "...reserves to the Chief the authority to approve certain proposed road construction or reconstruction projects in inventoried roadless areas until revision of a land and resources management plan or the adoption of a plan amendment that has considered the protection of other management of inventoried roadless areas as defined in FSM 7712.16a." The Tongass NF has been operating under a revised plan since 1997. This plan classified all of the inventoried roadless areas into land uses deemed appropriate by the Regional Forester. The 1997 record of decision is being appealed for many reasons; the most important being ANILCA prohibits nationally directed agency land set-asides. Therefore, the valid planning process must apply to all lands without regard to whether a specific area is roaded or unroaded. (Tribal Corporation, Seattle, WA - #A20468.10130)

1361. Public Concern: The Forest Service should recognize that it cannot supercede land allocations on the Tongass National Forest with a national roadless rule.

The Tongass Land and Resource Management Plan (TLMP) just completed an 11-year, $13 million revision funded by American taxpayers, which is currently under appeal by several entities. In addition to other legal impediments to the application of the roadless proposal on the Tongass, no changes in land allocations on the Tongass can be made by the Forest Service except to correct legal errors in the TLMP revision procedures or pursuant to a forest plan amendment following NFMA procedures. (Tribal Corporation, Anchorage, AK - #A20340.20400)

1362. Public Concern: The Forest Service should exclude the Alaskan national forests from a national roadless rule.

BECAUSE THE TONGASS NATIONAL FOREST HAS JUST REVISED ITS LAND MANAGEMENT PLAN

The Assembly of the City and Borough of Sitka passed the enclosed Resolution 00-78, A RESOLUTION OF THE CITY AND BOROUGH ASSEMBLY OF SITKA, ALASKA OPPOSING INCLUSION OF THE TONGASS NATIONAL FOREST IN THE U.S. FOREST SERVICE NATIONAL ROADLESS INITIATIVE, POLICY REVIEW AND SUPPORTING ALTERNATIVE T-1, on July 11, 2000.

This resolution was previously submitted to the Forest Service July 14, 2000, with a request to include this official position of the City and Borough of Sitka in the official comments concerning the Roadless Area Conservation Proposed Rule. We want to ensure these comments are also included in any subsequent review of any comments relating to the Roadless Initiative or any related actions.

Per the Resolution, we were pleased the Forest Service has exempted the Tongass National Forest from the interim directives due to its current Revised Tongass Land Management Plan. As the Resolution states, the City and Borough of Sitka supports alternative T-1 and permitting the Tongass to be managed under the Tongass Land Management Plan. (Elected Official, Sitka, AK - #A11819.45613)

It took over 10 years and a lot of hard work to craft the Tongass Land Management Plan (TLMP) finalized in the 1997 Record of Decision. Within that document is a planning process though which Alaskans can participate in making informed and sound decisions to appropriately and responsibly assist the federal government in managing operations within the Tongass Forest.

Our community and our region have, in the past, reasonably relied on the Forest Service's commitment to support a stable, broad-based economy, yet Southeast Alaska's communities have suffered adverse social and economic impacts due to the declining timber supply from the Tongass and other restrictions

on use of the forest. Any further actions must use the TLMP forest planning process to ensure that our economies not experience further degradation.

We respectfully request that the Secretary of Agriculture exclude the Tongass Forest from the national roadless policy in his final decision, and that future roadless issues here be addressed through the processes in the carefully crafted, legally mandated Tongass Land Management Plan. As Governor Knowles wrote in a recent letter: "any unilateral arbitrary federal edict imposing a roadless policy would be a 'double-cross' to the integrity of the public process." (Elected Official, Juneau, AK - #A23218.45613)

Balanced resource management on the Tongass is more closely approximated by the recently completed land management plan revision. The 97 "ROD" contained the compromises and tradeoffs between a full spectrum of interests and represents a good balance for the decade, as intended by NFMA. The 99 ROD circumvented most of the analysis, but is considerably more balanced than the remnants of management that would be imposed by the full adoption of the "Roadless Initiative". (Individual, Petersburg, AK - #A30209.20200)

The first major concern is based upon our belief that a decision to amend a national forest plan should be made through the regulations in place, mandated by law. Both the 1997 Tongass Land Management Plan (TLMP) and the 1999 amendment by Undersecretary Lyons not only considered the status of roadless lands; they also resulted in a further reduction in potential timber harvest in the Tongass. TLMP was supposed to be the decisional document for management of the Tongass, a fact underscored by Mr. Lyons during his 1999 visit to Alaska when he assured us that the Department's decision would "finally provide some certainty with regard to future uses and management direction on the Tongass." The proposed rule runs counter to that intent. (Elected Official, Ketchikan, AK - #A27725.20000)

BECAUSE DECISIONS SHOULD BE MADE THROUGH THE LOCAL FOREST PLANNING PROCESS

The final Agriculture Department decision on TLMP came in 1999. That decision included additional protection for unroaded, old growth areas along with significant additional restrictions on timber harvest. Though controversial, it appeared to be the culmination of the TLLMP process. However, this year, a federal district court vacated the Agriculture Department's decision and simultaneously ruled "the Forest Service shall prepare a SEIS [TLMP supplemental environmental impact statement] that evaluates and considers roadless areas within the Tongass for recommendation as potential wilderness areas. The Forest Service must also provide the relative contribution to the National Wilderness Preservation System in its analysis."

Although the Forest Service has not announced how it will proceed with implementation of the court order, it appears the roadless and wilderness issues will be addressed in the context of the forest plan.

In Alaska, the forest planning process has worked, and can continue to work. In fact, the adaptive management process outlined in TLMP provides the opportunity to adjust forest management based on new scientific information and the information from the cooperative monitoring effort to which the Forest Service committed in TLMP. The State of Alaska sincerely hopes the federal government will allow the forest planning process to work here in Alaska. (State Agency, Juneau, AK - #A23217.45613)

We believe that decisions regarding what to do with the roadless areas and other land use decisions on the national forests, including Alaska's Tongass, should be made through the local forest planning process which is governed by the rules at 36CFR219 and others. As an example, the second Tongass Land Management Plan was completed in 1997 after ten years of studies, plans, and public input from local and national groups including the state and Alaska native bodies. Many millions of dollars and countless hours of work by men and women in the office and the field went into the development of this plan. Putting the Tongass under the roadless rule nullified all this work. Needless to say, many of the planners and local groups are discouraged that their labors have been spent for nothing. (Professional Society, Juneau, AK - #A11803.45613)

Since I live in Alaska I can not speculate on what is correct for the other 49 states. But I can tell you the Roadless policies do not make sense here in Alaska! Look at an Alaska state map, you will quickly

realize we need more roads and trails, yes even in our parks and national forests. Over 3/4 of our state is not accessible except by boat, snowmobile or dog sled team? Please help get us a ruling allowing state-by-state decisions, allowing local conditions [to] dictate policy. (Individual, North Pole, AK - #A7175.45611)

Please exclude the Tongass from the main "body" of Roadless Rule making, and allow decision on land management to be made at the Forest Planning level, where NFMA intended. (Individual, Petersburg, AK - #A30209.45613)

The State of Alaska urges the Forest Service to affirm the central role and importance of the forest planning process on Alaska's national forests. Specifically, we urge the Forest Service to make decisions regarding management of Alaska roadless areas through the forest planning process, repeatedly asking for public participation for the Tongass and Chugach National Forests in Alaska, and throughout the national roadless policy discussion finalized last year.

Unfortunately, those calls were not heeded. In January of this year, the State of Alaska filed suit in federal court seeking to stop the application of the national roadless rule to the Tongass and Chugach National Forests.

The Chugach National Forest Plan (CLMP) is very nearly complete following extensive public review. Certainly areas of significant natural value and public interest need protection, such as the Copper River delta and other key fish and wildlife areas. The best course of action is to address such issues in the forest plan, not through the national roadless rule.

On the Tongass National Forest, recent federal court decisions present a unique situation. The Tongass Land Management Plan (TLMP) was completed in 1997 after one of the most comprehensive public reviews and most comprehensive planning processes ever undertaken on a national forest. The State of Alaska's comments on the draft plan called for adherence to Governor Knowles' principles of "doing it right": sound science, prudent and sustainable management, and an open public process that brings all stakeholders to the table. (State Agency, Juneau, AK - #A23217.45613)

When we reviewed the map of the Tongass in your office, it should have been apparent to all present that the Tongass is already well protected by prior federal actions. The Tongass National Forest is 16.9 million acres, of which approximately 6 million acres are forested. 938,000 acres (or about 5.5% of the total and 16% of the forested acreage, is already off limits to commercial timber harvest which of course is what the roadless proposal is intended to further restrict. Furthermore, after the implementation of further restrictions to protect habitat for fish and wildlife (goshawks, marten, deer, and wolves), the 1999 Record of Decision makes a total of 576,000 acres available for timber harvest. As I noted, federal policy has created a dilemma relative to management of the Tongass. The 1999 Record of Decision, with 200 year rotations and other restrictions, forced timber harvesting projected for the next 10 years to move into inventoried roadless areas. Now, the U.S. Forest Service is putting those areas off limits to logging emphasis). . . . Now, ten years after that landmark citizen legislation, the lands protected by the Tongass Timber Reform Act are still standing proud, wild and free. The bear, wolf, salmon, deer and every other creature carry on." This candid assessment clearly indicates that the 1999 ROD adequately protected the Tongass National Forest.

Thank you for meeting with us last week. In closing, the roadless policy should not be used to further amend TLMP. I believe that the preferred alternative in the draft EIS was correctly identified as the right decision with respect to proper management of the Tongass National Forest. You have the opportunity to protect both the Tongass and the communities of Southeast Alaska by sustaining the forest planning process as the proper way to manage our national forest. (Elected Official, Ketchikan, AK - #A27725.45613)

BECAUSE EXTENSIVE LOCAL FOREST PLANNING HAS BEEN COMPLETED

You are well aware of the history that has gone into the preparation of the Land Management Plans for both of Alaska's forests. The last revision to the Tongass was finalized in 1997 and took over six years to write at a cost of $13 million. The Chugach plan is near adoption after years of input and millions of

dollars in preparation. Both plans thoroughly address the "non-entry" option to guide the agency planners and ensure the public resources are protected. When you first accepted the special role to lead the roadless review for the previous administration neither Alaska forest was scheduled to be included in the roadless policy because current management plans were adopted or soon to be finalized. Bowing to political pressure and a massive letter writing campaign over the next 18 months, the Government was persuaded to include both of Alaska's forests in the final decision. The decision to include the Tongass and Chugach flies directly in the face of local input and promises made to Governor Knowles and all Alaskans for the past four years. (Association, Juneau, AK - #A879.45612)

Leave the Tongass National Forest out of this roadless plan. Through extensive painful local forest planning the Tongass has done their work and it should be allowed to stand. The lawsuit in progress over the inventoried roadless areas in the TLMP should be thrown out of court because the matter is already decided. Over 60% of the Tongass is already wilderness. Companies have invested millions in helicopters and developed methods to fly timber offshore to barges where no roads are necessary. The very small industry there depends on raw material from these areas. To prohibit timber harvest in the Tongass roadless is to kill that industry. Go to Deer Island in the Wrangle District and look at the helicopter logging taking place there this summer. You cannot even tell the trees are removed. (Business, Portland, OR - #A10558.45613)

Coeur Alaska, Inc., a wholly owned subsidiary of Coeur d'Alene Mines Corporation, strongly disagrees with the Roadless Area Proposed Rule. Likewise, we are opposed to the roadless proposal being extended to the Tongass National Forest. Coeur Alaska has operations within the Tongass National Forest, including patented federal mining clams and associated facilities, exploration and production rights to substantial number of unpatented claims, and a general interest in exploration and mining throughout the northern Tongass Forest. This forest has very recently been the subject of an extensive and costly area-wide planning effort resulting in adoption of the Tongass Land Use Plan. This plan withdrew from development over half of the land in the Tongass. Presently roads disturb less than five percent of the forest, and land available for timber harvest has been reduced to approximately 10 per cent of the Tongass land with commercial forest potential. (Association, Juneau, AK - #A23080.10130)

BECAUSE THE TONGASS LAND MANAGEMENT PLAN IS CURRENTLY UNDER APPEAL

The Tongass Land and Resource Management Plan (TLMP) just completed an 11-year, $13 million revision funded by American taxpayers, which is currently under appeal by several entities. In additions to other legal constraints to enactment of the roadless proposal, no changes in land allocations on the Tongass can be made by the Forest Service unless these are to correct legal errors in the TLMP revision procedures or are changes made through a forest plan amendment following NFMA procedures. The single fact that the TLMP is currently under appeal is quite adequate to preclude the Tongass from any consideration under this proposed roadless rule. (Professional Society, Anchorage, AK - #A21707.20200)

BECAUSE THE CHUGACH NATIONAL FOREST IS NOW AT THE STAGE OF RELEASING A FINAL EIS

The Chugach Land Management Plan Revision has been in process for more than four years and is now at the stage of releasing a FEIS specifically for the Chugach. Many groups and individuals have spent countless hours working with the Inter-Disciplinary Team on the Plan revision process, which has had over 100 public meetings and expended more than $3 million to date in the revision. As with the Tongass, including the Chugach National Forest in national roadless policy would make a sham of the Forest Service planning process established under NFMA. (Professional Society, Anchorage, AK - #A21707.20200)

BECAUSE THE PROPOSED RULE WAS NOT ADDRESSED IN THE CHUGACH NATIONAL FOREST PLAN REVISION PROCESS

The proposal cannot be adopted or implemented until such time as it is developed in a manner consistent with the NFMA requirements for amending forest plans. Because this proposal was not addressed in the CNF plan revision process, it should not be implemented on the CNF. (Tribal Corporation, Anchorage, AK - #A20340.20000)

1363. Public Concern: The Forest Service should exclude Alaskan national forests from a national roadless rule for environmental reasons.

BECAUSE ROADLESS VALUES HAVE BEEN MORE THAN ADEQUATELY PROVIDED FOR WITH NON-DEVELOPMENT LAND USE DESIGNATIONS

Nearly 6.8 million acres of the Tongass National Forest are presently designated as wilderness or Congressional LUD II areas where timber harvest and other activities are prohibited. Only 676,000 acres are classified as suitable for timber management under the 1997 Tongass Land Management Plan. Due to the non-development land use designations and other prescriptions in the 1997 TLMP, at least 90% of the presently unroaded lands in the Tongass will be unroaded at the time of the next land management plan revision. It is the Borough's position that roadless values have been more than adequately provided for on the Tongass and that meaningful consultation with local governments and others that have actual knowledge of local conditions will bear this out. (Elected Official, Ketchikan Borough, AK - #A17476.65241)

Alaska already has enough land that cannot be developed. We currently have 154 million acres locked away in some kind of federal conservation unit or another. To give you an idea of how large that is, consider that Texas is 161 million acres total land area.

The roadless policy makes no sense for Alaska now and it never did. Please do not include Alaska in any roadless policy that you are considering. (Individual, Anchorage, AK - #A15680.45610)

Most of the non-roaded [areas] of both the Tongass and Chugach National Forests are already [under] some form of protection provided either by Congressionally approved non-developed designations or one or more provisions in the Tongass Land Use Plan. [Please] respect the "No More" agreement in ANILCA, and specifically exempt the Tongass and Chugach National Forests in Alaska from any further consideration of roadless protection. (Association, Juneau, AK - #A23080.45612)

Please register my official opposition to the rule as it now stands and my strong support for exempting the Tongass and Chugach from any final national management prescription for roadless areas. A one-size-fits-all national rule does not make sense for either forest, given the fact that both are primarily roadless in a state that contains more than 100 million acres of conservation system units, most of which are also largely roadless. (Individual, Juneau, AK- #A17238.45610)

The Tongass Land Management Plan (TLMP), adopted in April 1999 after many years in process and after the expenditure of large sums of federal funds on environmental and related studies, already excludes 94.5% of the total acreage of the Tongass National Forest from commercial timber harvest. Put it another way, the vast majority of the 5,000,000 acres which have been identified by advocates of additional roadless restrictions are already restricted by being placed in a category which does not allow commercial timber harvest. These facts have been completely ignored by those who advocate that the Tongass be subjected to further restrictions. (Elected Official, Ketchikan, AK - #A27725.20200)

Here are four simple statements from hundreds of facts about land use and timber harvest on the Tongass.

Total acres of Forest available for timber harvest: 676,000 acres

Percent of Forest available for timber harvest: 3 percent

Productive Old-Growth (POG) Forest-wide (1995): 5,060,648 acres

Acres of managed timber stands in timber base: 234,000 acres

To compare us with other national forests in the lower 48 is unfair and shows a bias against the professional work by USFS staff in Alaska. I would urge you to remove the Tongass and Chugach forests from inclusion in the national roadless policy and allow the Land Management do the job they were designed to perform. (Association, Juneau, AK - #A879.45612)

BECAUSE THE UNIQUE AND ISOLATED TERRAIN PROVIDES INHERENT PROTECTION

Considering the unique and isolated terrain of the Tongass National Forest, we feel a roadless policy is unnecessary. (Tribal Association, No Address - #A23324.45613)

Despite the demands of non-development interests, it makes little sense to include both the Tongass and Chugach in the roadless rule. Both forests are primarily roadless in a state that has a very limited road system. The policy may make some sense in forests with few roadless areas remaining, but in Alaska it is neither necessary nor appropriate. Under current forest plans, the wild character of both the Tongass and Chugach are adequately protected and preserved. (Organization, Anchorage, AK - #A15542.45612)

The Tongass and Chugach National Forests are unique in the National Forest System. In reality, a very small portion of the Inventoried Roadless Areas will ever be developed because of their inaccessibility. Many of these areas are already protected under wilderness, remote recreation, Wild and Scenic River, or old growth reserve status. There are very few private inholdings and access to them is adequately addressed under ANILCA. We simply do not need another layer of "protection" administered at the national level. (Elected Official, Petersburg, AK - #A23084.45613)

1364. Public Concern: The Forest Service should exclude Alaskan national forests from a national roadless rule for forest health reasons.

There are a very vocal minority of residents in Southeastern [Alaska] who are on a "crusade" to eliminate any prospects for forest management. Many of these people have not lived and worked on the forest for very long. Yet these folks have been very effective in extending support for their radical cause.

Roadless on the Tongass is a VERY RADICAL proposal. This contrasts greatly with most lower 48 forests, where the initiative mainly reinforces many de-facto actions already consciously not taken. I read comments to a couple Wisconsin papers describing the merits of the proposal to protect the 60,000 acres of the Chequamegon (out of about 1,600,000 acres). This is a very minor effect on Wisconsin, yet the article devoted more space to the Tongass than the local forest. They essentially extended their view of the merits for the proposal on "their" forest, to "our" forest. Having spent some time there, I can understand the merits to "their" forest. Yet they obviously had no information or experience with which to judge the effects on "our" forest other than their conjectures.

Here, "full" roadless implementation may even close access to lands already harvested and in need of silvicultural treatment to maintain resource values, especially for wildlife habitat. The "anti-timber industry crusaders" tend to refer to lands already accessed by roads or having had timber harvest as though the land no longer existed. (Individual, Petersburg, AK - #A30209.45613)

The inventoried Roadless areas on the Tongass and Chugach National Forests have different vegetation cover types, stand conditions, fire, insect and disease risk values and different proximity to communities. The NFMA mandated that a forestland management planning process include the assessment of values, risks, protection and management options for each Roadless area. This assessment should provide the basis for determining what management options will best provide for healthy forests and include the option of a recommendation to Congress for Wilderness Area Classification. Areas not recommended for Wilderness Area Classification should not remain in a "Roadless category," but be managed to promote healthy forests under appropriate management prescription in the forest plan. The over one million acres of spruce bark beetle infested forest in South Central Alaska includes National Forest Roadless areas where insect control, salvage and rehabilitation prescriptions were appropriate, but blocked by special interest groups. Healthy forest management includes a variety of tools to maintain the vigor of the forest, among which include forest health. Just arbitrarily putting areas into Roadless status compromises the ability to use this tool. (Association, Ketchikan, AK - #A28980.30100)

FIRE HAZARD REDUCTION

We feel strongly that the process used to create the roadless rule was deeply flawed, forged by politics rather than professional reasoning, and in direct conflict with several federal laws. A single, one-size-fits-all rule that affects roadless areas across the entire national forest system cannot possibly address

conditions unique to each roadless area within each forest. For instance, national forests in Alaska were not analyzed for fire risk because "of the low fire hazard and fire occurrence associated with their temperate rain forests" (p. 3-409 Roadless Area Conservation FEIS). The FEIS failed to recognize the risk of fire within the CNF, which has been the subject of arguably the largest spruce bark beetle epidemic in recorded history and has killed more than 95,000 acres of white and lutz spruce stands on the CNF. The Forest Service spent $2.8 million in 2001 battling a single 3,260 acre out-of-control prescribed burn in this area of "low fire hazard." (Tribal Corporation, Anchorage, AK - #A20340.10120)

The Chugach National Forest is presently suffering from a pandemic of spruce bark beetles which has devastated more than 95,000 acres of Forest Service land on the Kenai Peninsula. An arbitrary ban on road construction in areas along the Seward Highway which qualify as "roadless" (whether inventoried or uninventoried) would preclude most management options (when economic viability is factored in) presently available to the Forest Service to deal with the extremely high forest mortality that has resulted from this insect problem. At this time, ecological and silvicultural considerations argue strongly against foreclosing options until the extent of appropriate management techniques can be fully assessed. (Professional Society, Anchorage, AK - #A21707.45612)

The FEIS, in its analysis of unique characteristics in Alaska, essentially ignored the 5.5 million-acre [Chugach National Forest] CNF. The CNF, with an astonishing 98.9% of its land base classified as roadless, is impacted by the proposed rule to a far greater extent then any other national forest in the nation, yet the effect of the roadless rule on the CNF, its users and land owners such as Chugach, who depend on it for access to their lands, was allocated only a cursory analysis in the FEIS. The roadless rule, as it is presently written, effectively eliminates the ability of land managers to maintain forest health and provide for future multiple-use opportunities on the CNF. The fact that ANILCA issues on the CNF were not even addressed further shows the abysmal failure of the roadless FEIS to identify critical local issues unique to each national forest. (Tribal Corporation, Anchorage, AK - #A20340.10131)

The FEIS failed to recognize the risk of fire within the CNF [Chugach National Forest], which has been the subject of arguably the largest spruce bark beetle epidemic in recorded history and has killed more than 95,000 acres of white and lutz spruce stands on the CNF. The Forest Service spent $2.8 million in 2001 battling a single 3,260 acre out-of-control prescribed burn in this area of "low fire hazard". The roadless rule effectively eliminates the ability of land managers to maintain forest health and provide for future multiple use opportunities on the CNF. (Professional Society, Anchorage, AK - #A21707.20207)

1365. Public Concern: The Forest Service should exclude Alaskan national forests from a national roadless rule.

BECAUSE THEY SHOULD BE MANAGED FOR TRADITIONAL MULTIPLE USE

Approximately 98 percent of the Chugach National Forest would remain roadless under the new rule. The rule would prevent the Forest Service from providing additional access, whether for resource extraction, forest health, recreation or tourism, despite future needs. It is vital that both the Tongass and Chugach be managed for multiple uses, especially in Alaska where 85 percent of the nation's national wildlife refuge lands are located, as well as 70 percent of its national park lands. These units, like most of Alaska, are primarily roadless and wild. (Organization, Anchorage, AK - #A15542.50100)

I am opposed to designating the Chugach National Forest as roadless. The Chugach was set aside to provide timber, water, minerals, fisheries and recreation to be managed under multiple-use. To close the Forest to vehicle use will severely limit management prerogatives. It will also limit public ingress and egress on the forest lands.

The natural land forms on the Chugach will limit vehicle use naturally without additional legislation or designation. This Forest is not a National Park and should not be managed as such. The personnel of the

Forest should be staffed with competent foresters and trained land mangers who understand vegetative growth and other competing uses to provide continuing resources uses in perpetuity.

I do not want the Chugach or Other large areas of the National Forest System to be closed off to a large segment of the public or restricted to a single use. (Individual, Eagle River, AK- #A25956.45612)

1366. Public Concern: The Forest Service should exclude Alaskan national forests from a national roadless rule for economic reasons.

BECAUSE ROADLESS AREAS MUST BE AVAILABLE TO PROVIDE FOR THE BASIC INFRASTRUCTURE NEEDS OF THE REGION

The present Roadless Rule impacts the Southeast Alaska Electrical Intertie Project, the Southeast Alaska Transportation Plan, and the Bradfield Canal Road, which would provide a much needed link to Canada and the U.S. mainland. On the Tongass, roadless areas must be available to provide for the basic infrastructure needs of the region such as roads for transportation and electric power transmission lines. Access to roadless areas is needed for timber harvesting and mineral extraction. (Manager, City of Wrangell, AK - #A17670.45613)

The Tongass is largely undeveloped, and inventoried roadless areas must be available to provide for the basic infrastructure needs of the region such as roads for transportation and electric power transmission lines. On the Tongass, areas within inventoried roadless areas must also be available for timber harvesting and mineral extraction. If not, the economic decline and attendant social problems experienced by the region because of increasing restrictions on the use of the forest and the decline in the timber supply from the Tongass will continue and worsen. (Elected Official, Ketchikan Borough, AK - #A17476.45613)

Roadless areas must be created with a purpose, the importance of which does not warrant Congressional designation. In the Tongass and Chugach National Forests a significant part of the land area under Federal jurisdiction has not been roaded or harvested. Designation of these areas as roadless would create administratively designated wilderness areas. In the Tongass and Chugach National Forests this action is contrary to ANILCA, which stipulates that there shall not be more studies of lands that could place them in a de facto wilderness status. Therefore, the planning effort should not impose roadless designation or preclude land access to Alaska communities, constrain opportunities to develop municipal water supplies, hydroelectric sites, sand and gravel extraction, transportation corridors and other attributes required for community commerce and development. (Tribal Corporation, Seattle, WA - #A20468.20207)

Transportation and utilities are key to the long-term viability of any economy and it takes an economy of critical mass in order to maintain an environmentally sound infrastructure. By restricting transportation and utility corridors, the policy limits the economies of Southeast. (Business, Juneau, AK - #A11824.75700)

The Tongass National Forest dominates the economy of Southeast Alaska. It surrounds all of our towns and villages many of which are predominately Native communities. Forest Service decisions regarding roadless policy can isolate the communities from each other, preclude the communities from benefiting from regional electrical intertie systems, development of safe water supply and many forms of recreation. (Tribal Corporation, Seattle, WA - #A20468.75300)

AELP, through its corporate affiliate, Lake Dorothy Hydroelectric, Inc. (LDHI), plans to construct the Lake Dorothy Hydroelectric Project in electric consumers located within the CBJ. In order to construct and operate Lake Dorothy, it will be necessary to construct a road from tidewater to Bart Lake, more or less paralleling the proposed penstock. Heavy equipment will be required to construct the transmission line from the Lake Dorothy powerhouse linking it with AELP transmission grid. It is AELP's

understanding, that the Roadless Policy now in effect, but now under review, will not allow the construction and operation of Lake Dorothy.

The proposed Lake Dorothy Hydroelectric Project is located on the east side of Take Inlet within the Tongass National Forest. It is within an area classified by the U.S. Geological Survey as a Power Site Classification (No. 238; established June 5, 1930). This classification recognizes the potential of the area for electrical generation and requires management of the area in compliance with Section 24 of the Federal Power Act. When the U.S. Forest Service's Tongass Land Resources and Management Plan (TLRMP) was approved this area was specified as a Transportation and Utility System Land Use Designation (TUS) to provide for the construction of the Lake Dorothy Hydroelectric Project as well as a transmission line connection with the existing transmission grid. If Lake Dorothy cannot be constructed, the alternative is to satisfy the electric energy deficit with diesel fueled engines and turbines. The use of diesel fuel has become more and more unpalatable due to air contamination, risk of spills and cost. Lake Dorothy is the next logical addition for the generation facilities owned by AELP.

It is AELP's understanding that the existing Roadless Policy will also block construction of the Southeast Electrical Intertie. The Intertie will link all of the Southeast Alaska electrically and make it so communities now dependent on diesel generation to instead purchase non-polluting hydroelectric energy from proposed projects such as Lake Dorothy.

AELP urges the United States Forest Service to allow the construction and use of roads within the Tongass National Forest in order to permit construction of the Lake Dorothy Hydroelectric Project, other hydroelectric projects and electrical interties within the Tongass National Forest. (Association, Juneau, AK - #A3023.91610)

BECAUSE COMMUNITIES DEPEND ON THE TONGASS NATIONAL FOREST

Of the 17 million acre Tongass National Forest, approximately 6.8 million acres are Congressionally designated wilderness or LUD II areas where resource development and other activities are either prohibited or restricted. Under the 1997 TLMP, at least 90% of the unroaded areas of the Tongass will remain unroaded when that plan is revised. On the Tongass, roadless values are already more than adequately protected, and no further protection is needed. Besides being illegal, it is simply irrational to apply a national-level prohibition on road building to the Tongass. Doing so will only serve to send Wrangell and its residents further down the economic spiral they are struggling against due to the decreased supply of timber from the Tongass and other restrictions on the use of the forest by those who depend on it the most. (Manager, City of Wrangell, AK - #A17670.45613)

The Roadless Policy significantly limits potential futures for the people of the Tongass. Unlike the residents of the lower 48, the communities of the Tongass are pockets of State and private land surrounded by the United States, Canada and the Pacific Ocean. The Roadless Policy preserves the accomplishment of the environmental groups to significantly reduce human habitation of the Tongass, and limits those remaining human's potential sources of income, transportation and basic infrastructure.

Transportation and utilities is key to the long-term viability of any economy and it takes an economy of critical mass in order to maintain an environmentally sound infrastructure. By eliminating transportation and utility corridors, the policy limits the economies of Southeast to where they are or less.

Southeast Alaska is dependent on the income generated by the Tongass National Forest. Income is derived from the fish, timber, mineral and tourism industries. Those industries support the basic infrastructure includes the water and sewer systems, electricity, roads, ferries, phones, healthcare and local government. The people of Southeast Alaska deserve the right to develop their communities and build a future for their children, it should not be dictated to them by the Sierra Club.

Without the income derived from the natural resources of the Tongass, communities will not be able to maintain their current infrastructure, let alone improve it. The harvest of the natural resources creates the critical mass of the economy. That harvest allows the economies of Southeast to grow, mature and build infrastructure to support exportable services for income.

First the long-term timber contracts were voided, in what appears to be a violation of Federal laws. Then the Tongass Land Management Plan, an exhaustive exercise in killing the timber industry by environmentalist and the former Secretary of Interior was passed.

Finally the Tongass was thrown in at the last minute to this Roadless Policy without regard to the long-term impacts of the people and communities of the Tongass.

Yes, the Roadless policy successfully eliminates the opportunities for the people and communities to exist in Southeast Alaska. Is that goal of the Federal Government? Eliminate human habitation in Southeast Alaska! Without a viable economy of critical mass, those remaining people will have a greater negative impact on the Tongass than larger, more diverse economy. Sewage systems will be too expensive and the disposal will revert back to running into the sea. Water systems will deteriorate and not be replaced. Healthcare will decline, and folks will have to fly to Seattle or Anchorage, but that means Coast Guard will be flying more emergency runs because commercial air transportation will not be available. As most economies are pyramids, remove the foundation which is the source of income; everything else will implode unto itself. (Richard Jackson, President, Alaska Native Brotherhood, No Address - #A15742.45613)

TO PROTECT THE TIMBER JOB BASE

The Tongass National Forest has been managed over the past ten years to achieve the agenda put forward by the environmental industry. This has already resulted in a massive reduction 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 Southeast Alaska. However, because of the changes in the management of the Tongass over the last ten years, much of Southeast Alaska has returned to an economy based on seasonal employment. The tourist industry provides only a few months of work per season. The fishing industry is also seasonal with a large portion of the fleet coming in for the fishing season only and therefore limiting their contribution to the economy. The timber industry has been reduced to the point that there remains only a few hundred year-round jobs out of the thousands that existed when the land base was large enough to provide the raw material for a significant forest products industry. (Association, Ketchikan, AK - #A20443.75310)

At a meeting of Southeast Alaska mayors (as well as in a personal conversation with me) in Sitka last year, Undersecretary of Agriculture Jim Lyons assured us that, based upon his record of decision on TLMP, there would be a timber harvest sufficient to operate existing and projected timber-related businesses in our communities. Additional restrictions in the Tongass National Forest, which would clearly result by inclusion of the Tongass, would contradict the statements made by Mr. Lyons. (Elected Official, Ketchikan, AK - #A27725.45613)

Most Southeast Alaska local communities have developed their economic base by using the resources available from the Tongass. Over the past 5-10 years the Tongass land base available for development has been reduced to the level that it is no longer possible to provide timber and other resources necessary to maintain a viable economic base. In evaluating the Tongass roadless areas, this issue must be viewed as the major difference between the effects of the roadless rule in other National Forests. We currently have over 90% of the forest in non-use categories. It is now time to review the few remaining areas in terms of maximization of commodity production rather than further restrictions. Wilderness is a single use category. In order to provide a balance, the remaining areas in Alaska must remain available for resource development so that the dependent communities have the resources necessary for maintenance of their economic base. (Association, Ketchikan, AK - #A20443.75510)

The potential timber products industry in South Central Alaska (the Chugach National Forest) has not had a chance to develop because of the lack of a viable supply of timber. The release of a draft plan that has no ASQ is not going to encourage investment or job creation in the area. This must be changed in the final plan and that plan must not be invalidated by implementation of a roadless rule. (Association, Ketchikan, AK - #A20443.75510)

The basic economy of southeast Alaska relies very heavily on natural resource development. Enormous land withdrawals from the timber base have driven down timber harvest levels and resulted in a severe reduction in the regional economic base. On the Tongass, only 7% of the original timber base is left

from which to provide the timber and other resources necessary to support the southeast Alaska economy. A similar situation holds for the Chugach as well. There is no ASQ in the draft land management plan for the Chugach, yet there are several mills that could be running viable operations if a reliable timber base existed. (Association, Ketchikan, AK - #A20443.75510)

Use of Existing Forest Plan Designations

Summary

A number of respondents believe that wilderness and roadless designations need not be a mutually exclusive choice, and some suggest applying existing forest plan designations as appropriate. Some respondents suggest using categories that minimize human impacts and preserve the unroaded character of these areas. Others ask that any areas that do not meet wilderness recommendation criteria be allocated to these types of categories. Some mention specific categories that they say are most appropriate, such as backcountry non-motorized, both winter and summer. Others specifically ask that the Forest Service rule out certain management categories for roadless areas, such as summer motorized, matrix, general forest, or any category that permits roadbuilding. Some state that individual forest plans should simply choose categories that are consistent with a national rule.

Others state that the Forest Service should reject both increased wilderness recommendations and roadless designation alike. Instead, some ask that existing management categories be used. These respondents request that the Forest Service apply categories that allow more intensive uses, especially motorized vehicle travel.

1367. Public Concern: The Forest Service should use appropriate existing management categories to protect roadless qualities.

RECOMMEND QUALIFYING AREAS FOR WILDERNESS AND ALLOCATE THE REST TO FOREST PLAN CATEGORIES THAT PRESERVE ROADLESS CHARACTER

IRAs which are not designated as wilderness should remain in some form of local Forest Plan allocation that preserves the spirit and intent of management direction of the RACR. (Individual, Lyons, OR - #A13491.25300)

We think both; that is, of those roadless areas selected to remain roadless, some should be recommended for wilderness and some should be put in a management prescription, like semi-primitive non-motorized, to protect them. This also is a decision to be made in the forest planning process. A few areas may warrant proposed wilderness status. Most will be placed in an unroaded prescription. Either way, the public will point the direction for that split. It will then be up to Congress to decide if a recommended wilderness warrants that protection. (Organization, Saint Anthony, ID - #A13225.25000)

In general, ATC strongly supports land-management designations, including Wilderness, that limit those incompatible developments and activities and provide additional protection to the Appalachian Trail corridor. The Trail crosses 66 such areas and comes within 0.5 miles of 50 additional areas that are managed in a roadless condition. There are undoubtedly other areas that have similar characteristics but are not currently managed in this manner. (Organization, Harpers Ferry, WV - #A21737.25000)

DESIGNATE ROADLESS AREAS AS BACKCOUNTRY NON-MOTORIZED

The Forest Service must—both by law and regulation—analyze remaining roadless areas for additional protections within the framework of their forest plan revision. Many of these have high quality, low elevation wilderness potential, or should be managed for backcountry non-motorized recreation to restore balance between motorized recreation and quiet use recreation. This is particularly important

because of the increasing pressure to extend motorized recreation for OHV trails, used only by a tiny minority of forest visitors, ever farther into de facto non-motorized areas. (Organization, Denver, CO - #A8824.25330)

Roadless lands having wilderness characteristics should definitely be considered for wilderness classification. Other roadless areas could be maintained under a specific designation for roadless area management under the forest plans if they are managed to remain roadless, undeveloped and have a semi-primitive, non-motorized recreation emphasis. (Individual, Bozeman, MT - #A8818.25000)

DESIGNATE ROADLESS AREAS AS BACKCOUNTRY WINTER NON-MOTORIZED

There are definitely areas that should have special designations assigned. This document should not be the deciding factor for them. Backcountry skiing, snowshoeing and other non-motorized winter activities must also be given designated areas. (Individual, Kemmerer, WY - #A8383.25350)

DO NOT ALLOCATE TO CATEGORIES THAT ALLOW SUMMER MOTORIZED USE

The mechanics of roadless area protection—i.e. what land management designations will be used—should be considered on a cases-by case basis in the local planning process. In some instances recommendations for Wilderness status, or designations to MA 6.2 or 8.1 (Scenic Areas) might be appropriate. Any existing snowmobile access routes in the inventoried roadless areas should be preserved, but ATV usage should not be allowed on these lands. (continuing the current policy). (Individual, Lincoln, NH - #A5640.25000)

DO NOT ALLOW INVENTORIED ROADLESS AREAS TO BE DESIGNATED MATRIX OR GENERAL FOREST

Local Forest Plans should not be allowed to establish blanket designation of IRA to “General Forest” or “Matrix” allocations. (Individual, Lyons, OR - #A13491.25330)

1368. Public Concern: The Forest Service should allow individual forests to allocate roadless areas to any management prescriptions that are consistent with a national roadless rule.

CREATE OR MODIFY PRESCRIPTIONS IF NEEDED

Individual forests should be allowed to designate roadless areas into management categories consistent with their existing land allocation structure, as long as such designations provide the level of protection required by the national rule. In no such management designation exists that is consistent with the national rule, one must be created or modified. (Organization, Boston, MA - #A23083.25100)

NFMA requires all forest plans to evaluate wilderness potential of all roadless areas and make recommendations concerning wilderness designation to Congress. Conservation of Inventoried Roadless Areas would not affect this provision of NFMA. This rule would most likely do neither of the 2 options given in Question 8. Forests already have designated lands for roadless area management. This rule should simply direct Forests to prohibit road building and logging in Inventoried Roadless Areas. If individual Forests find these areas sufficient for wilderness designation, the existing procedures can be enacted as under NFMA. (Organization, Tucson, AZ - #A21813.25110)

1369. Public Concern: The Forest Service should assign roadless areas to the most protective designation possible.

Should inventoried roadless areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation, or should they be maintained under a specific designation for roadless area management under the forest plan?

Whichever protects them from development better and will be passed. I’m not familiar with the legal differences between these designations, but I expect Congress would not pass this. (Too many big-business interest and short-term thinking, if any at all. (Individual, Arlington, MA - #A1152.25000)

Whatever designation has the best chance of keeping the roadless areas roadless and the wilderness wild despite changes in political administrations and their policies is the most desirable. (Individual, Anchorage, AK - #A518.25120)

I am less-versed in the differences between wilderness designation and the forest plan. In either case, the best interest of the ecosystem should be the ultimate goal, with political bureaucratic [considerations] secondary to the needs of the environment. (Individual, No Address - #A22265.25000)

THAT WILL PREVENT ROAD BUILDING

Roadless areas should be maintained under whatever designation is most likely to prevent road-building. If roadless areas are "lumped together" with areas that have roads, then they are less likely to be protected. Roadless areas need special protections that are not afforded to other areas, and whatever category they are ultimately placed in should cause road-building to be an extremely difficult proposition, if not impossible. (Individual, Columbus, OH - #A659.25000)

1370. Public Concern: The Forest Service should assign roadless areas to the category that will ensure protection as quickly and easily as possible.

[Q8] Whichever method is the LEAST complex, time-consuming, and difficult to accomplish to achieve protection for roadless areas. (This is one of the questions which confuses me; I am not an expert on Federal policy-making). I would guess that attaining Congressional designation for roadless areas would be more difficult than designating it through the forest plan. (Individual, Cumming, GA - #A21156.25000)

1371. Public Concern: The Forest Service should assign roadless areas to a modified National Conservation Area prescription.

WITH TEETH TO RESTRICT RESOURCE EXTRACTION AND DEVELOPMENT

An alternative to Roadless Area designation may be to modify the current National Conservation Area guidelines. Empower the National Conservation Areas with the authority to protect the resource from development and resource extraction, while allowing the current recreational activities to continue. Currently neither the National Conservation Area nor the National Recreation Area designations have the teeth to protect the land resource from development or resource extraction. (Individual, No Address - #A22297.25350)

Other New Management Categories

Summary

Several respondents suggest that the Forest Service create other new management categories rather than a specific roadless designation. Several groups suggest that the Forest Service revisit the "primitive area" concept of Bob Marshall and update it to create a Backcountry Recreation Area category. Those who recommend this category state that it will allow recreational activities that are prohibited in wilderness areas, while still preventing commodity use in roadless areas. They suggest that this would go a long way toward reducing conflict between various user groups over a national roadless rule by meeting the needs of a broad range of recreationists while still maintaining the primitive nature of these areas.

1372. Public Concern: The Forest Service should classify roadless areas as recreation areas.

ALLOW RECREATIONAL ACTIVITIES BUT NO RESOURCE EXTRACTION

At a bare minimum, every remaining scrap of roadless area should be considered seriously for Wilderness Area designation, under the 1964 act. Many ought to receive National Monument or Park status. Some won't pass muster, of course: these should be classified as Recreation Areas (the only designation that allows motorized use, while still giving wildlife and flora a fighting chance). (Individual, No Address - #A49.25210)

I do not favor additional wilderness designations of IRAs selected for future roadless protection. I feel wilderness too strict a designation. I favor a new type of designation if protection is needed from resource extraction—call it a "wild lands protection area" or name of your own choosing. In such a designated area, all forms of recreation are permitted but not resource extraction. The only logging permitted is to maintain forest health. (Individual, Palmer Lake, CO - #A22106.25300)

1373. Public Concern: The Forest Service should manage roadless areas as backcountry recreation areas.

"Backcountry" designation has been bantered around for years and rejected by the "all-or-nothing" timber industry and environmental organizations. But most of us who live near and play in the National Forests realize that wilderness or full development are not the only choices. Now is the time to dust this important concept off and make it a reality. Years ago the agency led the nation by designating several "Primitive Areas" under Bob Marshall's guidance. Eventually Congress made the pioneering concept permanent with the Wilderness Act of 1964. This is an opportune time for the agency to again demonstrate leadership with a backcountry designation and show what it can do with professional management. (Organization, No Address - #A8227.25300

We believe these areas should not be named "roadless areas" as part of the ongoing forest land use planning by the US Forest Service. Because, these same areas include thousands of miles of "roads," trails and ways, which are an important forest infrastructure and public asset. We believe a more appropriate name to assign these areas for forest planning designation is "Back Country Recreation Area."

The Back Country Recreation Area (BCRA) designation should be designed to provide reasonable protection of our natural resources and at the same time enhance the backcountry recreation opportunities. All "roadless' federal lands, not currently designated as Wilderness, should be reviewed for their importance to backcountry recreationists and considered for designation as BCRAs within the next 2 years. We need a designation that encourages cooperation, not only between diverse recreation interests, but between recreationists and the need for fire protection, forest health and wildlife concerns. The BCRA can be that designation. (Individual, No Address - #A1709.25300)

During my 42 years as a FS employee, I have always had a keen interest in wilderness and roadless areas. It has long been my opinion that we need a third category such as "back country." Many areas of the National Forests should be left relatively undisturbed, but without all the restrictions and politics of wilderness designation. (Individual, No Address - #A722.25300)

The anti-access groups scored a huge win when the previous administration pushed the highly flawed and questionably illegal Roadless Management Plan through. One of the reasons this was so important is the fact that now they can call an area "roadless" that indeed has many existing roads going through it.

When we brought this fact up in the Forest Service roadless scoping meetings, we were assured that if existing roads and trails were in "roadless areas", these roads would remain open as before the ruling. We have already seen lawsuits trying to stop some of the planned routes in the ATV Jamboree because they are in "roadless areas". Do you see where the problem lies and the advantage anti-access groups

have in calling areas "roadless" that are not? People across the country will now support shutting down these roads because surely there shouldn't be roads in "roadless" areas.

If an area has classified or unclassified roads or trails that have been in existence for many years with people driving on them, how can it be classified as roadless? I would respectfully suggest totally re-inventorying them with the help of the local people and user groups that know these areas, then renaming them "backcountry" areas. (Organization, Richfield, UT - #A20428.45514)

I believe these areas should not be named "roadless areas" as part of the ongoing forest land use planning by the US Forest Service because, these same areas include thousands of miles of "roads", trails and ways, which are an important forest infrastructure and public asset. They are, in fact, NOT roadless at all! I believe a more appropriate name to assign these areas for forest planning designation would be "Back Country Recreation Area". (Individual, Livermore, CA - #A23445.45514)

TO PROVIDE A RANGE OF RECREATIONAL ACTIVITIES THAT ARE PROHIBITED IN WILDERNESS

Some roadless areas are definite candidates for wilderness, others are important backcountry recreation areas where activities prohibited in wilderness are allowed (large groups, hut systems, mountain biking, snowmobiling). Since the public is never assured that non-designated areas will be managed forever as backcountry, perhaps it is time to resurrect Bob Marshall's idea for congressionally designated backcountry. (Individual, Jackson, WY - #A10527.25300)

TO PROVIDE MOTORIZED RECREATION OPPORTUNITIES

I would like to see the lands currently under study as roadless, to be managed as the Blue Ribbon Coalition proposed **backcountry** designation and <u>left open for motorized</u> and other types of recreational use. (Individual, White Salmon, WA - #A700.25300)

I urge you to scrap the Clinton roadless policy and replace it with a more user friendly multiple use policy, such as the "backcountry" proposal from the Blue Ribbon Coalition. There is room for common sense use and protection without locking out any particular user group. (Individual, Colorado Springs, CO - #A720.25300)

Agency Organization and Funding

This section includes three subsections: Agency Organization, Agency Funding, and Monitoring/Enforcement.

Agency Organization

Summary

General Comments – One respondent suggests that the Forest Service should restructure its organization to focus on ecosystem values rather than commodity production. Another individual suggests that the forests "should provide inspection and oversight of district administrative and management functions."

Forest Service Personnel/Training – Some respondents comment about the education and activities of Forest Service personnel. Several suggest that the Forest Service should employ staff trained in all forest uses, while others state that the Forest Service should employ staff trained in multiple use management or the "new disciplines." One group suggests that the Forest Service improve screening during hiring of personnel for education and experience. Other individuals focus personnel comments on educating existing employees. These respondents suggest educating personnel in conservation biology, to implement laws, to manage timber removal and transportation, to protect communities, and to effectively communicate and work with the public. Additionally, a number of writers comment about agency interactions with employees. Some suggestions include providing adequate staff and resources in the field; halting downsizing efforts; allowing local personnel to perform their duties; allowing employees to voice their views without fear of recrimination; and reducing the paperwork required of personnel.

Agency Organization General

1374. Public Concern: The Forest Service should restructure itself to focus on ecosystem values rather than commodity production.

Until the USFS is restructured to clear out old school, commodity oriented personnel, acquires expertise in social sciences and nonmarket social values, and replaces commodity production with ecosystem integrity and sustainability as its primary focus, I will not hold much hope that it will be genuinely committed to management of roadless areas within forest plans for non-commodity values. (Individual, Corvallis, OR - #A650.17300)

1375. Public Concern: The Forest Service should allow forests to provide inspection and oversight of district administrative and management functions.

AND DEVELOP AND DISPERSE BUDGETS

The forests should provide inspection and oversight of District's administrative and management functions and develop and disperse budgets. (Individual, No Address - #A26264.13200)

Forest Service Personnel/Training

1376. Public Concern: The Forest Service should employ staff trained in all forest uses.

In regards to good or appropriate forest management, how can this occur when there are not practicing timber foresters on the local staffs? All conservation practices are essential in good forest management. Also, each forest has to be addressed separately, just like the expression "one size does not fit all" forest management is no exception—each forest is different and must be handled as such. Staffing for all forest uses is a must. The multiple-use concept is a sound one and one that must be kept in use. Long-term non-use is not a good conservation practice. (Conservation District, Sublette County, WY - #A28888.30100)

1377. Public Concern: The Forest Service should improve screening of personnel for education and experience.

Employing people in the Forest Service from very diverse areas has produced abundant, often deep conflicts within the organization and some of these have increased the apparent public/agency conflicts. Improved screening for appropriate education and experience will benefit the Service and the nation. Failure to provide employment stability and to allow loss of experienced staff has been costly and has resulted in major conflicts. Both improved employment and retention of superior staff will improve the Service and reduce conflicts. (Civic Group, Roanoke, VA - #A1713.15164)

1378. Public Concern: The Forest Service should require local personnel to have at least 10 years experience on the forest before granting them decisionmaking authority.

The appropriate role of the local forest planning is to have personnel with numerous years of experience in that particular forest system to create a plan, which maximizes recreational opportunities while keeping the forest in an overall healthy condition. Every forest and its needs are different and for this reason only a person who has spent at least ten (10) years exploring and studying a forest can know the proper manner in which to manage that forest. Decisions cannot be made by someone in Washington D.C. or a state's capital . . . or by the recently transferred heads to local forests who have no real knowledge of the forest they have been assigned to. The key is having personnel with forest experience not political experience manage these resources. (Individual, Columbia Falls, MT - #A29651.13100)

1379. Public Concern: The Forest Service should employ scientific-minded managers.

IN ORDER TO PROVIDE MULTIPLE USE MANAGEMENT

Proper forest management should be and can be accomplished by employing sensible, scientific-minded mangers. What I have observed more and more over the past decade or so is that the Forest Service has tended to hire and employ people that have a strong individual leaning toward preservation. I could and will provide several examples of this if you wish. It you employ the wrong person, then poor management results. Change your criteria and philosophy to a more sensible multiple-use management and improvement in the forest lands will result. Use good and real science not politically driven, agenda-oriented "science." (Individual, Elko, NV - #A23650.30100)

1380. Public Concern: The Forest Service should encourage professionals trained in the new disciplines to join the Agency.

Remember that public trust in forest management is very low. The forest service has been promising everything to everybody and this strategy has been a failure. Closed management where public oversight is forbidden and where extraordinary environmental damage is occurring, like livestock grazing, is only working to the detriment of the agency. Encourage professionals trained in the new disciplines to join

the agency and actively seek ways to work collaboratively with willing participants. (Union, No Address - #A8392.12230)

1381. Public Concern: The Forest Service should educate personnel.

All those who participate in the process of decision making should be educated in the relative administration rules, attend public meetings, ask questions about that which is not understood and most importantly comply with environmental statutes. Those statutes regarding endangered species and environmental impacts including logging practices, timing of harvest, suitability of land for timber production and timber removal prescriptions. (Union, No Address - #A17699.15163)

IN PRINCIPLES OF CONSERVATION BIOLOGY

The Forest Service should consider the protection of the nation's biological heritage as its paramount value in addressing roadless areas. Forest Service managers and decision makers should become schooled in principles of conservation biology, particularly the need to protect large unbroken areas of habitat. (Individual, Dallas, TX - #A18002.15164)

The ultimate mission, mandate and original purpose for the creation of national forests and the U.S. National Forest Service should be well understood and appreciated by each and everyone of those under employ for the Forest Service; and, each and everyone held accountable to that calling. Now do your job; and, do not be detoured by those who choose to compromise that responsibility. Those who are unable to defend their actions on the foundation of the mission and principle should be relieved from further service. The founding purpose of the national forests was to serve conservation—let there be no doubt. (Individual, Geneva, NE - #A15512.10111)

TO ADVANCE COLLABORATIVE COMMUNITY FORESTRY

The Forest Service must downsize its historic timber-production workforce through retraining for advancing collaborative community forestry. (Individual, Cleveland, OH - #A26411.15164)

TO IMPLEMENT LAWS

The United States Forest Service needs to embrace the idea and reeducate its resource managers that one cannot lead from the middle. Their training and professional development should include the basic philosophy that as public resource managers one of their main responsibilities is to protect all Americans from the constantly changing political winds. This is done by fair and consistent implementation of the public laws, not by embracing panic mode responses to emotionally driven agendas. (Association, Cody, WY - #A26503.15164)

TO CARE FOR THE FORESTS

Local forests should be responsible for taking care and protecting local forests and wild life as its first priority. The Forest Service, Fish and Wild life people should be educated in their area/field and not by government bureaucrats or "big business." (Individual, Bozeman, MT - #A665.15164)

TO MANAGE TIMBER REMOVAL AND TRANSPORTATION

Most plans that are developed for the forests are based on such things that are ambiguous to a fault or esoteric to a fault. Plans should be developed by "knowledgeable" people who can do a good job. Many of the roads that have been constructed by the USFS have been done by foresters or others who have limited knowledge about road building, including the location design, construction, and maintenance of these roads. The same is true about harvest plans that have been designed by people with little knowledge about what they are doing. Harvesting and transportation systems are ENGINEERING activities that should be done by engineers and not ill-trained foresters and managers. (Individual, Corvallis, OR - #A1132.15164)

I met with [the Siuslaw National Forest supervisor] . . . . One of our first questions to her was "what are your feelings about the Roadless Initiative?" She was completely unaware as to what we were talking about. That is probably the largest concern to our organization yet today. We do not feel that [this supervisor] has the expertise to handle forest issues. Her reorganization attempt for the Siuslaw Forest

proves that point. She is a lovely person and is great with people but does not belong in a forest which grows and produces timber faster than any other forest in the world. (Organization, Florence, OR - #A11849.12230)

TO PROTECT COMMUNITIES

I am writing to you to protest what the United States Forest Service is doing to the community of Happy Camp, California.

I built a small mill starting in 1997 to help this community with some work and industry in what was called the old growth diversification program funded in part by the state and the United States Forest Service.

We expected the management of the forest to sell timber that was burned, dead, and/or dying timber that should be salvaged to protect the forest.

After we joined this program and spent a great deal of time and money, the Clinton Administration sent a man to the Klamath National Forest to close it down. This he has done, plus any other damage he could do to the people in this community. We can not even purchase a load of rock.

This forest [should] be managed, but it has to be done to preserve it and not destroy it. The people living here should have something to say about preserving this forest. We think it belongs to the people. The United States Forest Service is going to let a man that knows nothing about forestry destroy it. It is going to burn down.

I think this Ranger has to be removed at once. Or the people of this community will have to get together and remove the United States Forest Service. (Association, Happy Camp, CA - #A5708.12230)

TO EFFECTIVELY COMMUNICATE THE NEW PLANNING DIRECTION

Luckily, future forest planning on a province level basis and the direction of the Committee of Scientists will allow for collaborative efforts which can aim for ecological sustainability and integrity. A degraded forest with endangered species, increasing concern over noxious weeds, streams out of compliance with the Clean Water Act, native plant communities disappearing will no longer be able to support the heavy resource use of the past. Forest Service people need to be able to communicate the new direction and reasons for it effectively. (Union, No Address - #A8392.15111)

1382. Public Concern: The Forest Service should provide adequate staff and resources in the field.

TO IMPLEMENT FOREST PLANS

The agency should ensure that there are enough staff and resources in the field so that forest plans are implemented and objectives are achieved. (Individual, Cornish, NH - #A1712.17100)

To have a reasonable chance for success, the agency must provide adequate local forest funding and staffing to not only assure proper planning but to also assure consistent high quality project implementation and monitoring. (Business, Colville, WA - #A3362.17100)

TO ENSURE THAT PROHIBITED ACTIVITIES DO NOT OCCUR IN ROADLESS AREAS

Protection will require some major management of people numbers and monitoring of actual conditions and trends. The Agency must dedicate enough human and monetary resources to assure that prohibited activities are not occurring in any roadless areas at any time. (Individual, Grangeville, ID - #A830.17300)

1383. Public Concern: The Forest Service should dispose of its weapons.

The U.S. Forest should give up their attack helicopters, automatic weapons and side arms. What is the U.S. Forest afraid of that they need all these weapons? (Individual, Longview, TX - #A16468.17300)

1384. Public Concern: The Forest Service should not employ archeologists.

Get rid of the phony government archaeologists (who are nothing but self serving liars). Ever wondered why you never see a shingle on a storefront saying archaeologist for hire? These phony liars derive all their income from government. (Individual, Longview, TX - #A16468.17300)

1385. Public Concern: The Forest Service should halt staff downsizing efforts.

On the Siuslaw, R-6 the Regional Forester . . . has approved a plan to consolidate all of the southern administrative units into one office in Florence and lay off almost 30 people. Because of the travel time necessary to reach many areas of the forest from Florence and the reduction of people from the workforce, this consolidation virtually assures that vital thinning will not occur in a timely manner.

Please stop this alarming trend. Our national forests need to be managed to provide the ecological and economic needs of our society. Direct [the regional forester] to abandon the consolidation of the Siuslaw and the associated reduction in workforce. Don't allow the most productive national forest in the country to deteriorate because of lack of people and facilities. Please do this today, as I understand that the consolidation is underway and personnel on the Siuslaw are being reassigned. (Individual, No Address - #A2312.17300)

1386. Public Concern: The Forest Service should ensure that employees support multiple use.

All USDA Forest Service employees should support multiple-use including timber production or find jobs elsewhere. (Individual, Princeton, WV - #A18086.50200)

1387. Public Concern: The Forest Service should allow local personnel to perform their duties.

IN ORDER TO SAVE TAXPAYERS' MONEY

Why don't you save the taxpayers some money, and let the USFS troops in the field get on with their jobs. I work with my local rangers, and they work hard and effectively at what they do. And if they don't love it, they've got me fooled. (Individual, Clemson, SC - #A898.12125)

1388. Public Concern: The Forest Service should allow its employees to voice their views without fear of recrimination.

The Union is very concerned about recent threats of reprisal from the Administration toward Forest Service employees who have voiced their concerns about the Roadless Area initiative. It is totally unacceptable for any employee to be threatened by the Administration with retirement if they voice questions about the Roadless Area Initiative. Nor should they be told that that they cannot be talking to certain people. Forest Service employees take pride in their public service and professionalism. Forest Service employees should be treated respectfully—most certainly by Forest Service leadership. All employees should be encouraged to have diverse opinions and to use all their skills to solve problems and facilitate public relationships and debates. (Union, No Address - #A13245.15000)

1389. Public Concern: The Forest Service should analyze the potential impacts on its employees resulting from implementation of the Roadless Area Conservation Rule.

The Forest Service Council was not informed of, nor were we part of, any discussion on this large, percussive issue. We did not know about it until we read about it in the newspapers. We have still not been approached by the Administration to discuss the potential impacts of this proposal on our lives.

Downsizing has already devastated Forest Service employees. Reduction in force (RIFs) occurred as a result of the Spotted Owl shutdowns in Oregon and Washington, and the downsizing hasn't stopped there. **Forests around the country continue to have their work force ransacked.** This is particularly frustrating when we see the enormous growth in size and power of the Washington Office. We do not know the full impact this latest proposal will have on our remaining work force. But certainly hundreds,

and possibly thousands, of jobs could be eliminated, and another RIF could possibly result. (Union, No Address - #A13245.15000)

1390. Public Concern: The Forest Service should reduce the paperwork required of its personnel.

MANAGEMENT of the National Forest is the absolute KEY WORD! No one can manage an area they cannot get into. Forest personnel are so tied up in paperwork they don't have time to manage so the first item should be de-paperwork them! (Individual, Spring City, UT - #A15783.15100)

Agency Funding

Summary

General Comments – Some respondents suggest that the Forest Service should be adequately funded and that these funds should be efficiently allocated. One individual urges the Agency, "Instead of spending millions on building new roads, consolidate duplicate organizational structures conceived in the days when ranger district offices were located a reasonable horseback ride from each other. Combine ranger districts, combine national forests; reduce the top-heavy overhead at the Regional and Washington level, and put that saving into the field."

Funding Sources – According to some respondents, the Forest Service should remove timber in roadless areas to help support the Agency's budget. Other respondents state that Forest Service funding should not depend on revenues from timber removal or other commodity uses. One individual suggests that "income from non-timber products [should] stay within the Forest Service" in order for it to operate within its income.

Funding Priorities and Financial Accountability – A number of respondents provide comment regarding how the Forest Service should manage its funds. Some suggest providing funds for ranger stations, educating the public, or for fostering environmental and human values. Others suggest ways they think taxpayer funds should not be used. Suggested inappropriate uses of funds include maintaining areas restricted to the public, settling lawsuits filed by environmental groups, revising regulations, and purchasing agency vehicles. According to one individual, the Forest Service should "be concerned only with raising money to help reduce the national debt." People also suggest that the Forest Service adequately identify the costs and benefits of the Roadless Area Conservation Rule, including the costs of implementing the Rule. Several respondents assert that the Forest Service should be held accountable for its expenditures.

Agency Funding General

1391. Public Concern: The Forest Service should be adequately funded.

Back the Forest Service, pay them for their worth and potential and maybe enlarge their dept. If the government can afford to subsidize big business and fleecing of America they/we can surely pay for the work the F.S. can and will do if given a chance. (Individual, Bozeman, MT - #A665.17100)

1392. Public Concern: The Forest Service should request adequate funding.

Please ask for funds to adequately support the Forest Service's recreation and trail programs. For many years the Forest Service has said they support recreation but they have NOT asked for the appropriated monies to do so. "On the ground monies" have decreased for the last 3 years, while money for various plans have increased! Please ASK for more money for field level staff and projects. (Organization, Los Gatos, CA - #A1062.17100)

1393. Public Concern: The Forest Service should efficiently allocate its funding.

Instead of spending millions on building new roads, consolidate duplicate organizational structures conceived in the days when ranger district offices were located a reasonable horseback ride from each other. Combine ranger districts, combine national forests; reduce the top-heavy overhead at the Regional and Washington level, and put that saving into the field.

Instead of spending millions on building new roads, spend it on fully funding an efficient wild land fire organization, an efficient recreational organization, and more dollars into the trails program. (Individual, Gridley, CA - #A3712.17000)

Funding Sources

1394. Public Concern: The Forest Service should seek more dependable funding.

Develop political clout; advance the cause of more dependable funding including grants from NIH, tax exemptions for forest supporters. (Individual, Del Mar, CA - #A868.75600)

1395. Public Concern: The Forest Service should continue to removal timber in roadless areas to support the Agency's budget.

Let me make it clear I am not a logger, nor from a logging family. However, I would think it prudent to harvest the timber, as timber sales would help with your budget. (Individual, Big Timber, MT - #A5630.75510)

1396. Public Concern: The Forest Service should not rely on timber sales to support the Agency's budget.

What you really must do is figure out how to fund the Forest Service without timber sales, since I believe the Forest Service will still be necessary to protect this fabulous resource. As a nation we must figure out the best way to take care of our forests, just as we must do with our national parks. (Individual, Cedar Mountain, NC - #A28624.17130)

1397. Public Concern: The Forest Service should insist that income from non-timber products stay within the Agency.

USFS should insist that income from non-timber products stay within the FS. Congress should insist that USFS live within its income. IF the full cost of timbering and providing various recreational services is really charged, there will be adequate funds for providing the services the forest needs to be ecologically sustainable. Stop using the public forests to provide subsidized products to the timber industry and recreational users. Use the forest in ways that are ecologically sustainable. P.S. Experienced foresters will testify that these admonitions will result in refraining from building roads that will cause destructive erosion and that won't generate timber revenues adequate to off-set the costs of the roads (much less the erosion). (Individual, No Address - #A906.75400)

1398. Public Concern: The Forest Service should ensure that funding for individual forests is not dependent on extractive industries.

The budget for the local forest service representative should not be dependent on extractive industry, such that short-term business concerns pressure decisions. (Individual, Boulder, CO - #A20502.13110)

Funding Priorities

1399. Public Concern: The Forest Service should manage its funding for certain purposes.

FOR RANGER STATIONS

By providing funding for Ranger stations, all of these problems can be addressed in a single step. Rangers provide first-hand information to forest management, from detecting fires to monitoring insect populations. By keeping the areas truly roadless, one hopes that hazardous fuels would not build up. (Individual, Rego Park, NY - #A5996.17230)

FOR EDUCATING THE PUBLIC

More funds in general can go toward educating the public on ecological issues, the changing of the American public, and the values of recreation to the local economies. (Individual, Missoula, MT - #A6143.17000)

1400. Public Concern: The Forest Service should use tax dollars for certain purposes.

TO FOSTER ENVIRONMENTAL AND HUMAN VALUES

I would also like to see our tax dollars used to restore wildlife habitat, water quality and the quiet enjoyment of our publicly owned National Forests. (Individual, Missoula, MT - #A3647.17100)

1401. Public Concern: The Forest Service should not use taxpayer funds for certain purposes.

TO MAINTAIN AREAS THAT ARE RESTRICTED TO THE PUBLIC

I don't think citizens should be taxed to maintain lands they can't have access to, except for military bases. (Individual, Asheville, NC - #A15196.17110)

TO SETTLE LAWSUITS FILED BY ENVIRONMENTAL GROUPS

I am appalled that taxpayer money is wasted on settling ridiculous law suits filed by liberal environmental groups that feel the need to save every animal or placing them on some endangered species list without evidence to even suggest that they are endangered. (Individual, Whitefish, MT - #A8765.15121)

TO REVISE THE ROADLESS AREA CONSERVATION RULE AND THE PLANNING REGULATIONS

The Roadless Area Conservation Rule should be implemented as it currently is written. The Bush Administration should stop trying to undermine the rule and wasting taxpayer dollars in the process. I would like to know how much was spent gathering input on the last rule, and how much has been spent trying to undo it. The administration should also let stand the new planning regulations drafted by an independent committee of scientists, and stop further waste of taxpayer dollars by attempting to undo those. (Organization, Ellijay, GA - #A17692.17210)

TO PURCHASE AGENCY VEHICLES

I haven't seen a Forest Service employee on a horse in years. It's one employee to one vehicle running up and down the roads doing nothing, at taxpayers expense. (Individual, Elko, NV - #A20279.17100)

1402. Public Concern: The Forest Service should be concerned only with raising money to pay down the national debt.

The Service should not be concerned with trying to "meet all of the desires of all of the parties". They should be concerned only with raising money to help reduce the national debt. (Individual, Port Townsend, WA - #A964.15160)

1403. Public Concern: The Forest Service should adequately identify the costs and benefits of the Roadless Area Conservation Rule.

The Costs and benefits listed all seem to be guess work. Most categories were assessed by "Qualitative discussion". (Page A-21) Can you say, "junk science"? (Organization, Bozeman, MT - #A11947.17220)

INCLUDING THE COSTS OF IMPLEMENTING THE ROADLESS AREA CONSERVATION RULE

The alternatives and effects must adequately reflect the costs of survey and landline location, law enforcement, signing, studies, and other related costs that will be imposed on local Forests to implement this proposal. (Individual, Alturas, CA - #A28581.17120)

1404. Public Concern: The Forest Service should not allow the cost of road obliteration to take away from other funding priorities.

Roads exist in several of the roadless areas in the Superior National Forest. The cost to obliterate some of these roads will take away from the funds needed for other forest programs and result in increased fire fighting costs. (Elected Official, Lake County, MN - #A18049.17240)

1405. Public Concern: The Forest Service should use money designated for the Advance Notice of Proposed Rulemaking for forest improvements.

Other Concerns. What other concerns, comments, or interests relating to the protection and management of inventoried roadless areas are important?

Yes, this was a waste of our tax dollars and my time. We've already done this.

You could have used the money to improve the national forest. (Individual, Atlanta, GA - #A4509.17200)

Financial Accountability

1406. Public Concern: The Forest Service should be accountable for its expenditures.

A major concern is that the funding for our National Forests and other Public Lands have been cut to the bone over the years. This makes it impossible to deal with the many issues facing the Stewards of the Land. Without proper funding these agencies are stuck in the mud. On the other hand these agencies must also be more accountable with how they spend what funding they get. (Individual, Coulterville, IL - #A114.17100)

I am a Town Clerk for one of the small communities that lay in the valleys of the Manti-LaSal and it seems to me that there is a problem here. You use taxpayers' money to maintain the Forest Service and its National Forests and yet you are barring those same people from enjoying the very forests their money goes to support. WE have to account for every penny we spend of taxpayers' money. They have a say in how it is spent. That should apply to you also. (Individual, Centerfield, UT - #A12776.10130)

1407. Public Concern: The Forest Service should take no action that cannot be paid for with funds raised by that action.

The Service should take no action that it cannot pay for with funds raised by that action. (Individual, Port Townsend, WA - #A964.17000)

Monitoring/Enforcement

Summary

Some respondents assert that the Forest Service should monitor abuse of public lands; others further suggest engaging the public in identifying abuses. Respondents comment particularly that the Forest Service should enforce land use policies. Some suggest enforcement is needed in order to ensure environmental integrity, while others state that enforcement should be used before restricting uses. At the same time, one individual states that the Forest Service should prevent any interference with legal forest uses. Respondents offer several suggestions on how to enforce land use policies. These suggestions include strengthening and enforcing pollution and anti-dumping laws, providing adequate people-power, providing adequate funding for law enforcement, and using money allocated for administration to prosecute abusers.

1408. Public Concern: The Forest Service should monitor abuse.

There also needs to be a method of monitoring for those few who abuse the right and privilege of public lands. (Individual, No Address - #A340.15161)

1409. Public Concern: The Forest Service should engage the public in identifying abuses.

Put up questionnaire cards or pamphlets in camping areas and perhaps road interests asking the public for help in spotting problems. Maybe put in signs showing what to watch for. Use the forest guests (no one loves the forest more than the people who come there to spend time). A GOOD ROAD will help keep the forest healthy by using the eyes of those who come to enjoy our forests. Keep the roads maintained. If someone breaks a new trail . . . fine him or her . . . then block the road break. (Individual, Glade Park, CO - #A22419.90120)

I am in favor of programs similar to Cal Tip where the users are encouraged to report abuses. We need to keep users informed and allow them to monitor the areas since they are most likely the ones who will be in the area. We need to use regulations wisely to achieve access while maintaining the forest for generations to come. (Individual, Simi Valley, CA - #A16470.15161)

1410. Public Concern: The Forest Service should enforce land use policies.

Designating Areas: First of all this should be done as part of the process mentioned in question one and two. Does adding more rules work? Up the road in the same National Forest there was a problem of inappropriate and over camping (besides the litter). Problem was USFS did not have enough resources to ENFORCE the RULES. Solution they added more rules; now you can not camp, have a fire or park on the road without paying three dollars! The effect on the partying college kids from the other side of the mountain? They still drive up in daddy's 4X4, camp where they like, start fires anywhere they please, leave their beer cans along the sides of the whole ten mile road, and would you believe they do not pay the three bucks to park either! Maybe those well meaning people, who dug up and removed all the fire rings, should have instead dug up the roads at both ends! I could still walk there and there are no parking fees in my yard, but if there are any fishermen left they might be a little mad. (Individual, Center Sandwich, NH - #A3669.15161)

I'd like to see facts and data that really supports this roadless concept as to its benefit. Perhaps this is just another way to side-step problems with poor regulations, or in not enforcing existing laws? . . . A few areas, that have been poorly managed or that some people have abused, should not spoil it for the rest of us. However, I think that most people would support a "road-limited" policy. In many areas such as Nevada, there are way too many dirt roads (because of idiots who have to 4 wheel drive every ridge and

peak). However, many of these *do-it-yourself* roads could have been prevented if the current "No Off-Road Travel" policies had been initially enforced with severe penalties. (Individual, Elko, NV - #A21907.10110)

Currently I live in Colorado and enjoy the outdoors as often as possible, through many types of activities and recreation. It is especially pleasing to have truly wild areas to explore and view, however, these areas are shrinking year by year. I often encounter new ATV trails, improper campfire practices, out of season kill remnants, and lots of trash. It is my belief that the current system of protecting these areas is failing. Either the areas of these local agencies to observe are too large, they are under funded or under staffed. I have also found in some localized places, when informed these agencies say that there is nothing they can do, or outright admit that they do not care. (Individual, Kittredge, CO - #A11768.13110)

TO ENSURE ENVIRONMENTAL INTEGRITY

Roadless area management needs sufficient enforcement to ensure the environmental integrity is preserved. (Individual, Ennis, MT - #A102.17230)

TO PROVIDE FUNDS FROM CITATIONS

Why not police the roads and give citations for the ones that are abusing the areas. I know you will say that you don't have money for the extra manpower—but the money generated from the citation should more than cover it. We have encountered MANY people drinking and such and would greatly appreciate them being taken care of as we are on family outings when we are there and do not appreciate this kind of activity in front of our children.

Please reconsider this drastic act and consider the thousands of families and individuals that you will be affecting. (Individual, No Address - #A6719.17130)

BY STRENGTHENING AND ENFORCING POLLUTION AND ANTI-DUMPING LAWS

I think pollution and anti-dumping laws of public lands should be strengthened and enforced. IRAs should above all else be clean. (Individual, Fraser, CO - #A30203.45400)

BY PROVIDING ADEQUATE MANPOWER

We have noticed that once roads are opened they often become illegal trash dumping grounds, because the areas are isolated and there is not enough manpower locally for enforcement. (Individual, Randleman, NC - #A14005.15161)

BY PROVIDING FUNDING FOR ADDITIONAL LAW ENFORCEMENT NEEDS

In some forests such restrictions might require the implementation of law enforcement patrols. In these cases, USFS should provide additional funds to cover the need for new law enforcement positions. (Individual, No Address - #A29334.15161)

BY USING MONEY ALLOCATED FOR ADMINISTRATION TO PROSECUTE THOSE WHO ABUSE THE FOREST

I would suggest spending some of the money you use administering to use punish those that abuse the forest. This would include off road vehicles as well as hiker and horse backers. Allow all present roads to be used and make laws with penalties for those that leave the roads. Gather help from ORV clubs to help enforce this. I have witnessed local clubs monitoring areas for just such a reason. (Individual, Longmont, CO - #A17891.3.17230)

BEFORE PROHIBITING FURTHER USES

All current and legitimate activities should be allowed. The Forest Service must better enforce current laws for dumping, off-road use, etc., before further prohibiting uses. (Individual, Fountain Hills, AZ - #A5990.90000)

1411. Public Concern: The Forest Service should prevent the interference of legal uses of forest resources.

Interference with legal users of forest resources must be prevented. Any form of interference or intimidation must be swiftly crushed, and the perpetrator(s) punished. (Individual, Spring Creek, NV - #A26896.15110)