

## Comment Summaries

What follows is a summary by subject/category of the public comment that was received on the NOI (Notice of Intent). The summaries are designed to provide the reader with an understanding of the range of comments. In compiling the summaries we chose to quote actual comments. We hope this provides the reader with a flavor for the actual comments, rather than just the Forest Planning Team's interpretation.

### Roadless & RARE II Areas (4000)

#### Overview

This subject covers those comments related to Roadless & RARE II areas on the forest. This subject area received more comments than any another subject.

#### Relationship to Revision Topics

The comments under this subject are related to topic 3.2.12 Roadless and Unroaded Areas. Many comments are also related to topic 3.2.22 Wilderness Recommendation. Comments about specific roadless areas and wilderness recommendation were coded to this subject. Some of the comments are also related to 3.2.11 Recreation Opportunities and Use, 3.2.13 roads, 3.2.18 Timber Management, and 3.2.23 Wildlife Habitat Management.

**Table 1. Comment Statistics for Roadless & RARE II Areas Categories**

Category	#Comments	Percent of Total Comments
4000-General	1896	12.97
4005-Carr Mountain	2	0.01
4006-Wild River	796	5.45
4007-Elbow Pond	2	0.01
4008-Pemigewasset	729	4.99
4009-Sandwich Range	761	5.21
4015-Great Gulf Extension	3	0.02
4017-Kinsman Mountain	21	0.14
4018-Cherry Mountain	700	4.79
4019-Dartmouth Range	723	4.95
4028-Kearsarge	726	4.97
4029-Kilkenny	4	0.03
4035-Caribou Speckled	1	0.01
4036-Pemi Extension	1	0.01
4040-Other Specific Areas	36	0.25
4050-Roadless Initiative	21	0.14
4060-Mountain Treasures proposal	24	0.16
Totals	6446	44.11

Over ninety percent of the comments coded in this subject area favor protection of roadless areas.

*“Please protect any remaining roadless areas in the forest.” (#3164)*

In discussing roadless areas the comments identify activities that should be excluded from roadless areas.

*“...protect all roadless areas 1,000 acres or greater in size from logging and road building.” (#819)*

*“I strongly believe in protecting ALL Roadless areas from logging & off road vehicles.” (#2449)*

Comments also identify the benefits of protecting roadless areas.

*“Given how rare it is to find old-growth and remote forest habitat in the Northeast, the Forest Service should place a high priority on protecting any remaining roadless areas. To put it simply, areas that cannot be reached from existing roads*

*should be removed from timber management. Roadless areas offer plants and wildlife that prefer remote old forests the space needed to maintain viable populations, while at the same time providing the highest level of protection to streams and rivers. Roadless areas also offer other benefits including research, education, wilderness recreation, and spiritual renewal.” (#459)*

*“The White Mountain Nat'l Forest is an irreplaceable resource. Keeping roadless areas is essential to preservation of wilderness in New England.” (#1955)*

*“It is a truly unique resource in the East that provides ecological value and spiritual renewal. This value and renewal can only be maintained for future generations to enjoy if remaining roadless areas are protected....” (#325)*

The specific roadless areas that received the most comments include Wild River, Sandwich Range, Cherry Mountain, Dartmouth Range, and Kearsarge.

*“Wild River is the largest roadless area left in the Whites not yet designated Wilderness. By recommending this area for Wilderness you would be taking the first step in permanently protecting an area of unparalleled ecological and recreational value.” (#1549)*

*“We strongly support the expansion of the Sandwich Range Wilderness. The eastern United States has precious little in the way of open space. Wilderness is especially ‘endangered’. As population and growth pressures continue, it has become imperative that we preserve what little wilderness we have left. It is much more economical to save now than to reclaim in the future.” (#1137)*

*“...please place as your highest priority the long term health of the forest. In order to achieve this, the new plan should ... 2) recommend special areas such as the Wild River Valley, Kearsarge, the Dartmouth range, Cherry Mountain, and lands around*

*the Sandwich Range and Pemigewasset as new wilderness,...” (#819)*

Other areas that received comments include Carr Mountain, Elbow Pond, Great Gulf Extension, Kinsman Mountain, Kilkenny, Caribou Speckled, and Pemi Extension. There are also some comments requesting that the Zealand and Sawyer river valleys be protected as roadless.

Some comments disagree with the general theme of protecting all roadless areas.

*“With respect to future management of existing roadless areas, the SPNHF supports the general balance of uses within the national forest as specified in the 1986 forest plan. We are not opposed to further protection of some roadless areas by their removal from the timber base; however, we believe that recent proposals for increasing the acreage of roadless area remove too much land from forestry and other multiple uses.” (#3541)*

*“Further, areas that are not currently allocated a management designation, such as the Wild River drainage, should be placed in the timber base (2.1 and 3.1 management designations) and managed for multiple benefits, including a sustainable supply of forest products.” (#3432)*

*“The Planning Board at this time cannot support the expansion of Wilderness within the Town of Lincoln. Specifically, the expansion of the Sandwich Range Wilderness along Scar Ridge as currently being proposed by Friends of Sandwich Range. The proposed extension is for 22,300 acres, the majority of which is in the Town of Lincoln. The current plans appear to include a part of the Loon Mountain ski area, both existing facilities and proposed expansion.” (#2653)*

Many comments received reference the National Roadless Initiative. These comments are roughly split between those that support the initiative and those that oppose the initiative.

There are also some comments made that support the Mountain Treasures proposal made

by the Appalachian Mountain Club, The Wilderness Society, and the Conservation Law Foundation.

*“I heartily support The Wilderness Society's and the Appalaichan [sic] Clubs recommendations for protecting all roadless areas, so that all of us in this great country, not only the Westerners, can benefit from wilderness areas.” (#2900)*

## Category Summaries – Roadless & RARE II Areas

### General (4000)

Nearly all of the comments coded to this category favor protecting roadless areas on the Forest.

*“I ask that ALL remaining roadless areas on the White Mountain National Forest be protected as wild, unroaded forest under the revised forest plan.” (#3098)*

*“Preserving what we have would be my highest priority. This means leaving remaining roadless areas roadless.” (#366)*

*“Please continue to protect and expand the roadless areas in the White Mountain National Forest. As a Westerner I see that the current demand for wild places exceeds supply in the East.” (#3181)*

Comments identify two different acreages when discussing the size of roadless areas.

*“Protect all roadless areas of 1000 acres.” (#3109)*

*“I support protecting the remaining roadless areas as we need to protect parcels of over 5,000 acres.” (#321)*

Slightly less than half of the comments favoring roadless protection identify specific activities that should be prohibited in roadless areas. Most of these comments mention timber harvesting and road building. Some of the comments mention off road vehicle use.

*“The Forest Service should place a high priority on protecting any remaining roadless areas. These remote areas should*

*be removed from timber management.” (#1181)*

*“It is also very important that the existitng [sic] roadless areas remain roadless and that areas that cannot be reached from existing roads be removed from timber management.” (#3285)*

*“Please do not build anymore roads into the WMNF. I think it is important to protect the remaining roadless areas, especially Wilderness.” (#1304)*

*“I strongly urge the Service to emphasize the following as it writes the new plan: 1) Permanently protecting the remaining roadless areas from road development...” (#1777)*

*“Please protect all roadless areas of WMNF and keep motorized vehicles out.” (#813)*

About one third of the comments that support roadless areas identify specific reasons for protecting roadless areas. The most commonly mentioned reasons are that they provide remote natural areas that allow people to get away from the pressures of modern life and they provide habitat for plants and animals.

*“Roadless areas are important for solitude and spiritual renewal, which are not easy to find in the modern world.” (#362)*

*“I feel it is extremely important to protect any and all remaining roadless areas in the White Mountains. These areas should be removed from timber management. These areas are important to plants and wildlife, and to the protection of streams and rivers. It is also important that I, as an individual, still have the opportunity to visit an area like this; it helps renew my connection to nature and the natural world, it renews my spirit. It is similar to religion for me.” (#1171)*

*“protect roadless areas for intrinsic worth, serenity, different from urban views, preserve environment that's limited today” (#3481)*

*“Current roadless areas in the White Mountains are some of the last precious reservoirs of habitat for flora and fauna in the Northeast” (#17)*

*“Roadless areas should be protected in order to preserve the natural environment...” (#1961)*

*“In addition, please protect existing roadless areas (and create new ones) to provide unfragmented landscapes for wildlife.” (#2054)*

Two other reasons given for protecting roadless areas are old growth and water quality.

*“Given how rare it is to find old-growth and remote forest habitat in the Northeast, the Forest Service should place a high priority on protecting forest areas that cannot be reached by existing roads.” (#132)*

*“I feel that the roadless areas of WMNF should be protected for many reasons. ...As watersheds, they are important resources for drinking water and natural water protection.” (#376)*

Other benefits mentioned in the comments include wilderness values, recreation opportunities, research/education opportunities, and future generations.

*“Roadless areas also offer other benefits including research, education, wilderness recreation, and spiritual renewal.” (#3144)*

*“The WMNF is the last ‘wilderness’ available to millions of people in the Eastern megalopolis [sic] and needs to be preserved for the enjoyment of the majority. Protecting roadless areas is vital to the ‘wilderness’ experience, therefore no further road building should be allowed.” (#2145)*

*“I think it is very important to protect the roadless areas so that people can hike in & get the full effect of nature.” (#2163)*

*“I strongly urge you to protect the roadless areas as roadless; to preserve the back-country as it may have been for centuries, with only foot trails for the quiet enjoyment*

*of those generations of people to come so they may know the pleasure of quiet nature experiences.” (#2634)*

There are a few comments that do not agree with the sentiments expressed in most of the comments.

*“The Division of Forests and Lands supports the continuation of timber harvesting in roadless and unroaded areas with the understanding that harvests would be conducted with sensitivity to the unique resources and remote character of the area. We believe that harvesting technology and techniques exist to accomplish many goals concurrently.” (#3519)*

*“We challenge your statement ‘We need to protect and manage cautiously the relatively few remaining roadless areas.’ That seems to say that the land needs to be set aside to be protected, and we know that isn’t true. Indeed, sometimes you need active management to protect it. Roadless [sic] areas are plentiful enough, and not the few that your statement suggests.” (#3131)*

*“I do not want to see the roadless area idea used on the W.M.N.F. Instead let the White Mountains be an educational forest showing the whole world the best ways to practice sustainable forestry as a multiple use on public lands, hand in hand with all multiple uses.” (#3203)*

There are some comments that reflect ideas distinctive from other comments.

*“The Forest Plan must include provisions for monitoring and enforcement of those activities that may negatively impact these pristine areas.” (#2884)*

*“The ‘roadless areas’ suggested in recent discussions are hardly unroaded areas. There is a need to clarify what the criteria are and what is under discussion.” (#3135)*

*“Guidelines for management of roadless areas, while primarily aimed at maintaining these areas in a natural condition, should not unduly constrain management of existing recreational*

*activities or facilities in these areas. In particular, management of backcountry recreational facilities (including such things as maintaining existing vistas along trails and around shelters and winter firewood cutting at Zealand and Carter Notch huts) should continue under current guidelines.” (#3444)*

*“With respect to the Forest Service Proposal (NOI Topic 3.2.12 Roadless and Unroaded Areas), the Forest Service has not clearly described the issues, nor has it described the nature and scope of the proposed action. The use of the terms ‘Roadless’, ‘roadless’, ‘inventoried’, ‘identified designated’, and ‘unroaded’ are confusing, misleading and generally not adequate for the public to understand the issues or offer meaningful comment. Since the terms are so poorly defined, the scope of the proposed action is difficult to understand. It is impossible to determine how much land might be included or affected.” (#3541)*

*“For those roadless areas that are to remain available for multiple uses, SPNHF advocates the following policies: ● Road construction should be restricted to Type I (winter, intermittent service) roads only. The SPNHF opposes the construction of any further Type II or Type III roads in currently roadless areas; ● The USFS should practice only low impact forestry in these areas. We define low impact as: 1) Winter only, frozen ground; 2) Bole only, no whole tree harvesting; 3) Infrequent entry (30+ year entry cycle); 4) No clearcutting in patches over 5 acres in size; 5) Preference for forwarding with high flotation tired equipment; and 6) Possible bidding allowance to provide incentive for low impact forestry.” (#3541)*

#### **Carr Mountain (4005)**

There are two comments coded to this category. One wants the area preserved. The other wants the area recommended for Wilderness.

*“One specific area I would like to see preserved is the Carr Mountain/Elbow*

*Pond area. The ponds that sustain healthy brook trout populations are of special concern.” (#1543)*

*“The revised Forest Plan should recommend ...Carr Mountain areas for wilderness designation.” (#3549)*

#### **Wild River (4006)**

Nine out of ten of the comments coded in this category indicate that the Wild River area should be recommended for Wilderness designation. The others indicates that it should be protected as a roadless area.

*“The Friends of Wild River's proposal should be incorporated into a Wilderness alternative also. The shape and location of the Wild River drainage is a perfect fit for congressionally designated Wilderness. The wetland complexes in the upper part of the valley provide core wildlife habitat. On winter trips we have seen signs of all wildlife species including pine marten and bobcat. We saw moose eating white birch bark and we had never seen that behavior anywhere on the forest before.” (#2654)*

*“I think that although managed logging is good in some areas, it is important to have the central (Wild River) areas remain roadless.” (#1923)*

Some comments request that the existing access road in the Wild River area be maintained.

*“I would also like too see the Wild, ... River valleys returned to a roadless condition, through [sic] the primary road in these valleys should remain open for recreational access.” (#716)*

A few comments recommend the Wild River area not be managed as roadless or Wilderness.

*“The desirability of providing extra protection from lumbering and other potential development for the Wild River area has been noted and promoted by many of the environmental organizations. As one of the last remaining areas suitable for wilderness designation there is increasing pressure to lock up this parcel as has already been done to many of the other*

*most desirable areas of the Forest. In establishing these now existing "wilderness" areas the environmentalists have effectively stolen the use and enjoyment of these most treasured areas away from anyone unable to walk into them. These areas block out a whole segment of our public from enjoying the very best the Forest has to offer.*

*Not all areas are suitable for reasonable safe access. Recognizing this we should work extra hard to preserve access into the remaining areas that do afford reasonable safe access. This could be as simple as a summer pathway allowing small motorized wheelchairs or adapted ATV's to gain entry into the heart of the wilderness area. In the Winter, the Wild River area already has access via now discontinued snowmobile trails which followed the old rail bed through the Wild River area.*

*Reestablishing this Winter trail would be an easy, non disruptive means of giving access back to the disabled. This trail is a low impact means of complying with the intent of ADA to provide meaningful use of all public facilities including the special wilderness-like areas." (#3331)*

*"Further, areas that are not currently allocated a management designation, such as the Wild River drainage, should be placed in the timber base (2.1 and 3.1 management designations) and managed for multiple benefits, including a sustainable supply of forest products." (#3432)*

#### **Elbow Pond (4007)**

There are two comments in this category that want the area preserved.

*"...we believe the following areas are of high priority for maintenance of or restoration to roadless condition: ... The Elbow Pond area." (#3444)*

#### **Pemigewasset (4008)**

All of the comments coded to this category indicate that the roadless areas around the Pemigewasset Wilderness should be preserved.

Over 90 percent of the comments indicate that the areas should be recommended for Wilderness.

*"New wilderness areas should be created for... the lands around Pemigewasset [sic]." (#3109)*

*"The vast Pemigewasset Wilderness Area roadless areas will preserve the natural beauty and habitat of the wilderness area. The proposed roadless expansion will ensure the wilderness experience and protect ecological resources. From the summits that surround the Pemigewasset Wilderness Area the expansion of roadless will protect the natural views." (#3332)*

#### **Sandwich Range (4009)**

Most of the comments coded to this category indicate that the roadless areas around the Sandwich Range should be protected. Over 90 percent of the comments express a desire to see these areas designated as Wilderness. Some of the other comments suggest that they be maintained as roadless areas.

*"I heartily support the protection and expansion of the Sandwich Range Wilderness. Since 1960 my family has lived on Squam Lake and we often hike the Guinea Pond Trail to reach Black Mt. Pond on Mt. Israel." (#2809)*

*"I understand and subscribe to the many technical arguments in favor of the expansion, [proposals to expand the Sandwich Range Wilderness] i.e. that it will improve habitat, protect watersheds, reduce erosion and sedimentation by limiting motorized [sic] access, etc. Further, I believe sincerely that there will be little or no adverse impact on the logging economy. My own interest [sic] is in the spiritual side and I believe more and more people are sharing my view. We need more and more space to 'get away from it all'". (#3027)*

Several of the comments favoring Wilderness designation also reference the proposal made by the Friends of the Sandwich Range.

*"More specifically, I hope you will support the Friends of the Sandwich Range*

*proposal to extend the Wilderness boundary [sic] in the Sandwich Range Wilderness Area. We need more land set aside to insure that there will continue to be undisturbed forests in the future. Our Wilderness proposal causes very little loss to the timber base while offering the opportunity to protect historical, cultural and recreational resources.” (#2655)*

A few comments disagree with the general theme of the majority.

*“Some boundary adjustments may be beneficial to administration of the Sandwich Notch [Wilderness] area, but the wholesale additions presented by the local group are not justified, particularly when MA 6 designations will take care of any additional back country use needs.” (#1550)*

*“The Planning Board at this time cannot support the expansion of Wilderness within the Town of Lincoln. Specifically, the expansion of the Sandwich Range Wilderness along Scar Ridge as currently being proposed by Friends of Sandwich Range. The proposed extension is for 22,300 acres, the majority of which is in the Town of Lincoln. The current plans appear to include a part of the Loon Mountain ski area, both existing facilities and proposed expansion.” (#2653)*

*“I support the recent proposal of the Friends of the Sandwich Range (FSR), with one exception. ..., I am concerned about the added difficulty and cost of maintaining existing trails if the FSR's proposed Scar Ridge Extension were designated as Wilderness, thus precluding use of mechanized trail clearing tools...*

*Therefore, I recommend that you designate the FSR's proposed Scar Ridge Extension as a Scenic Area. This would provide the protection that the FSR, AMC and I are seeking by prohibiting use of ORVs while allowing the use of mechanized trail tools. Since this area surrounds the Greeley Ponds Scenic Area, it could be designated*

*as an extension of the existing area, or be given a more global name.” (#3138)*

*“Also the areas between the existing Sandwich Range Wilderness and private property should not be changed to Wilderness designation, especially in the Wonalancet area. These areas were left to act as a buffer between private land and the Wilderness. I served on the Sandwich Range Wilderness Committee and those of us not wanting Wilderness did most of the compromising when it came to setting the boundaries [sic]. Also you lose the Wilderness experience if you set the boundary [sic] line close enough to roads and private houses to be able to hear vehicles and other machines. Many of these additions are much to close to roads and habitation.” (#3403)*

#### **Great Gulf Extension (4015)**

The three comments coded to this category identify the reasons that the Great Gulf is special and indicate that it should be protected as either roadless or Wilderness.

*“Roadless areas such as ... the Great Gulf have endless opportunities for solitude and are places where many species of animals and birds need to flourish.” (#337)*

*“In the Great Gulf Wilderness there is extensive long range study of the effects of air pollution. Expansion of roadless areas will maintain the local environment and the pollution studies of the wilderness valley. From overlooks in the Great Wilderness Areas, the expansion of roadless areas will permanently protect the natural beauty, instead of viewing a network of roads.” (#3332)*

*“The WMNF is the largest publicly owned parcel in New England and thus the best opportunity that we have to preserve large tracts of interior forest habitat in New England. This opportunity is not readily available elsewhere. I think that it is an excellent idea to expand existing federally designated wilderness areas such as ... Great Gulf, .... These extensions would*

*provide us with large areas of reserves where nature is in control not humans.”* (#3407)

#### **Kinsman Mountain (4017)**

All of the comments in this category want the Kinsman Mountain area to be preserved.

*“I would like to see ... the Kinsman Mountain area (including Beech Hill),... preserved as roadless areas.”* (#2998)

#### **Cherry Mountain (4018)**

All of the comments, except two, coded in this category request that Cherry Mountain be designated as Wilderness. The two exceptions request that the area be protected, though they do not mention Wilderness designation.

*“Protect wilderness wherever possible, especially, ... Cherry Mt,...”* (#1169)

*“Recommend special areas as new wilderness, such as ... Cherry Mountain,...”* (#2905)

#### **Dartmouth Range (4019)**

All of the comments coded to this category request that the Dartmouth Range be preserved. Over ninety percent of the comments request that it be designated as Wilderness.

*“Specific roadless areas I would like preserved are ..., the Dartmouth Range, ...”* (#2312)

*“...adding more wilderness areas in places such as Dartmouth Range,...”* (#2259)

#### **Kearsarge (4028)**

All of the comments coded to this category request that the Kearsarge area be preserved. Over ninety percent of the comments request that it be designated as Wilderness.

*“Specific roadless areas I would like to see preserved are ... the Kearsarge region including a corridor to the Wild River area,...”* (#3195)

*“Protect wilderness wherever possible especially Kearsarge,...”* (#1169)

#### **Kilkenny (4029)**

The comments coded to this category identify the reasons that the Kilkenny is special and indicate that it should be protected as Wilderness.

*“Roadless areas such as Kilkenny ... have endless opportunities for solitude and are places where many species of animals and birds need to flourish.”* (#337)

*“I believe the WMNF should recommend the Kilkenny area for wilderness designation. There is perhaps no issue more central to my hopes for the new LMP.”* (#3132)

#### **Caribou Speckled (4035)**

One comment was coded to this category.

*“The WMNF is the largest publicly owned parcel in New England and thus the best opportunity that we have to preserve large tracts of interior forest habitat in New England. This opportunity is not readily available elsewhere. I think that it is an excellent idea to expand existing federally designated wilderness areas such as ... Caribou/Specked Mountain. These extensions would provide us with large areas of reserves where nature is in control not humans.”* (#3407)

#### **Pemi Extension (4036)**

One comment was coded to this category.

*“...we believe the following areas are of high priority for maintenance of or restoration to roadless condition: ... The Pemigewassett [sic] region, particularly areas along the north slopes of Garfield and Twin Mountains and surrounding the Sawyer Pond Scenic Area, as well as currently roaded areas in the Zealand and Sawyer River valleys...”* (#3444)

#### **Other Specific Areas (4040)**

Almost all of the comments coded in this category address a request to restore three river valleys to a roadless condition. Two thirds of the comments want the primary road access into the valleys maintained.

*"I would also like to see the Wild, Zealand, and Sawyer River valleys returned to a roadless condition, though the primary road in these valleys should remain open for recreational access." (#1)*

*"Currently only 4 of the 18 major rivers on the WMNF (the East Branch of the Pemigewasset [sic] and the Dry, Rocky Branch and Wonalancet Rivers) flow primarily through non-timber management areas. We feel that the representation of whole-watershed natural areas on the forest should be increased, as there are no opportunities to accomplish this outside of the WMNF." (#3444)*

A few comments mention other specific areas to protect as roadless.

*"The roadless initiative and new rule which is to be incorporated into the revision, should also apply to any projects which have been postponed or deferred by the Forest Service, including, but not limited to, the Hazelton Brook Project,..." (#707)*

*"The Presidential/Dry River area, especially that area between the Dry River Wilderness and Route 16." (#3444)*

*"Owls Head on Cherry Mtn. - precious resource, even trail-less - bush whacking better for souls." (#3487)*

#### **Roadless Initiative (4050)**

Comments on the National Roadless Initiative were coded to this category. These comments are roughly split between those that favor the initiative and those that are against it. Among those that favor the initiative there is a range of comments.

*"I support President Clinton's Roadless Area proposal 100%." (#2654)*

*"While we feel that the "preferred alternative" in the DEIS falls far short of what it should be, all the elements to reach those goals are laid out in the other alternatives present in the DEIS—for example, we hope that the final rule also bans logging, mining, and further ORV use in these areas." (#3441)*

*"I support the Clinton Administration's [sic] initiative for reviewing further road construction [sic] within roadless areas of the National Forests. I support the review of the National Forest road issue as a Forest Service national policy issue." (#2661)*

There is also a range of comments among those who are against the initiative.

*"As a representative of the Bates College Outing Club, I would like to ask you to please consider carefully the Clinton/Gore proposal to remove 300,00 acres from multi-use and timber harvesting in the White Mountain National Forest.*

*The removal of this land from timber harvesting would appear to be very harmful to the forest and deprive the communities surrounding it of a good economic resource. The area's economy depends mainly on timber harvest and recreational activities within the WMNF. Loss of these two commodities would be a major problem for many people there, including people now employed directly by the National Forest Service. The forest itself would suffer as reforestation would not occur as quickly with limited space, and more damage would be done by nature through fires and winds than by human hands." (#1537)*

*"The variety of definitions involved in the 'roadless' issue continues to be confusing. We believe that suitable roadless areas on the WMNF have already been identified and considered. Those that are valid have already been selected. We do not support designation of additional 'roadless' areas that may surface using new criteria or definitions of a 'road', 'roadless', 'unroaded', or by using a different analysis unit size (ie. 1000 vs. 3000 acres)." (#3401)*

*"I think further decisions such as this should lie at the local level rather than in the political arena." (#3438)*

**Mountain Treasures proposal (4060)**

The comments coded in this category support the recommendations made in the Mountain Treasures document by AMC, the Wilderness Society, and the Conservation Law Foundation.

*“Please make all 16 large roadless areas described in Mountain Treasures 6.2 lands or wilderness study areas (if they are not already wilderness.)” (#2173)*

*“The recommendations for protection in ‘Mountain Treasures’ should be the bare minimum of what should be prescribed in the revision of this Forest Plan. However, it is not enough. We should, and must, go further.” (#3407)*

*“...We would like to see these areas set aside from road building, logging, and additional motorized recreation in the new forest plan.” (#3441)*

*“No other place in New England, including the larger but heavily degraded industrial forests of Maine, offers such an expanse of roadless terrain that is punctuated by sizable mountains, great, free-flowing rivers, and pristine ecosystems that have suffered little human impact beyond the intensive logging of the 19th century. The concept of establishing 16 roadless areas identified in the recent report by the Appalachian Mountain Club, the Wilderness Society, and the Conservation Law Foundation offers us a truly rare and priceless opportunity to preserve and maintain a legitimate backcountry experience.” (#3447)*

A couple of the comments provide additional detail on what should be done in the revision.

*“We ask that Mountain Treasures and America’s National Forests: A Vision for the Future form the basis of the preferred alternative for the revised forest plan.” (#3441)*

*“The analysis presented in Mountain Treasures used a one-half mile zone around system roads to delineate currently accessible areas. We recognize that this is only an approximation, and that final*

*delineation of roadless areas will be based on criteria developed by the Forest Service. However, we believe it is adequate to identify significant areas that are not currently accessible from system roads. Based on this analysis, we believe that between one-quarter and one-third of the existing MA 2.1 and 3.1 lands should be considered for re-allocation to non-timber management areas. We also believe that all areas currently designated as ‘holding areas’ (MA 9.4) should be allocated to non-timber management areas.” (#3444)*